

BOARD OF DIRECTORS

Co-Presidents

David Shaw
New York

Lynne A. Liddington
Knoxville, TN

Co-Vice Presidents

Mary Uhl
New Mexico

Bruce S. Andersen
Kansas City, KS

Co-Treasurers

George S. Aburn, Jr.
Maryland

Merlyn Hough
Springfield, OR

Past Co-Presidents

G. Vinson Hellwig
Michigan

Larry Greene
Sacramento, CA

Directors

Andrew Ginsburg
Oregon

Anne Gobin
Connecticut

James Goldstene
California

Cheryl Heying
Utah

Thomas Huynh
Philadelphia, PA

John S. Lyons
Kentucky

Shelley Schneider
Nebraska

Richard Stedman
Monterey, CA

Barry R. Wallerstein
Los Angeles, CA

Executive Director

S. William Becker

March 17, 2011

Info CHIEF Help Desk
Office of Air Quality Planning and Standards
Office of Air and Radiation
Environmental Protection Agency
Research Triangle Park, NC 27711

Re: Comments on Recommended Procedures for Development of Emissions Factors and Use of the WebFIRE Emissions Factor Database – Review Draft

Dear Sir/Madam:

On behalf of the National Association of Clean Air Agencies (NACAA) – the national association of air pollution control agencies in 51 states and territories and over 165 metropolitan areas across the country – thank you for this opportunity to comment on Recommended Procedures for Development of Emissions Factors and Use of the WebFIRE Emissions Factor Database – Review Draft (“Draft Recommended Procedures”), which was released by EPA on December 17, 2010. NACAA supports EPA’s efforts to revise and update information regarding the development of emissions factors and use of WebFIRE and offers the following comments on the Draft Recommended Procedures.

First, NACAA is concerned with EPA’s continued reliance on the existing Electronic Reporting Tool (ERT) and the alternate spreadsheet template for submitting data to WebFIRE. The association has raised its concerns with the utility of the ERT in previous comments to EPA,¹ and is disappointed that the agency has included the existing ERT in the Draft Recommended Procedures. State and local agencies’ exposure to this technology in the Information Collection Request for the Industrial Commercial and Institutional Boilers National Emission Standard for Hazardous Air Pollutants confirmed our assessment that the existing ERT is cumbersome and does not meet the needs of all users.

¹ See NACAA Comments on Advanced Notice of Proposed Rulemaking for the Emissions Factors Program Improvements, submitted December 14, 2009; PM_{2.5} Modeling Implementation for Projects Subject to National Ambient Air Quality Demonstration Requirements Pursuant to New Source Review: Report from NACAA PM_{2.5} Modeling Implementation Workgroup (January 7, 2011).

The ERT, a Microsoft Access ® application, is not based on current database technology and is an ineffective platform for gathering emissions test data on which to build a national emissions factor program. In addition to a poor user interface, the computational formulas in the MS Access application are not transparent and do not allow for coding to be viewed in order to validate calculations. The accompanying spreadsheet tool also lacks documentation to support the formula calculations, and appears to be focused only on the stack tester. The result is that calculated information reported by the testing facility in ERT cannot be validated by the agency. Instead of continuing to rely on the existing ERT, raw emissions test data should be submitted directly to the Central Data Exchange (CDX). Calculations should only be performed using a secured, transparent, and well documented process after submission to the CDX.

In order to better facilitate the submission of data and provide a more workable platform for data users, NACAA recommends that EPA develop an emission reporting tool based on a web-enabled technology platform with coding and supporting documentation that is fully transparent to users at each stage in the process. Such a tool could significantly reduce the number of steps required in transmitting data, as well as data corruption and number of individuals that must process the information. This is critical to improve the emissions factor program.

Second, while NACAA welcomes efforts to reduce the subjectivity of qualitative assessments of the emissions, process, and control device data collected during an emissions test, the association encourages EPA to further refine tools for quantitative comparison. The Draft Recommended Procedures include reference to an Individual Test Rating score that uses quantitative data from the emissions test and a qualitative review by the regulatory agency. However, it is difficult to determine whether the scoring criteria identified in Appendix B are the appropriate methodology for making this determination. For example, process data are only 15% of the criteria, yet the accuracy of such information may significantly impact data quality, justifying a higher reliance on these data in the scoring criteria. Likewise, an agency observed stack test may be of higher quality than the 2% weight provided in the criteria. NACAA supports the collection of this information to improve transparency of the emissions factor basis, but would suggest a more focused rating tool that utilizes a smaller set of parameters that are key indicators of the test quality.

Third, NACAA supports EPA's efforts to enhance WebFIRE. Both the retrieving of additional detailed information for the recommended emissions factors and the specific emissions test data used to calculate the recommended emissions factors will enhance the reliable use of emissions factors. The capability to develop a user-defined emissions factor is also consistent with previous NACAA comments. As it is unclear from the Draft Recommended Procedures whether enhancements to WebFIRE will include improvements in searching and identifying emissions factors, NACAA encourages EPA to consider this functionality in its final design. This would greatly improve the efficiency of agency staff as they identify applicable emissions factors as part of their work to develop emissions inventories.

Fourth, NACAA is pleased that EPA is currently working to update the point source Source Classification Codes (SCCs), and looks forward to reviewing the draft SCC revisions.

The association urges EPA to ensure coordination between the SCC revisions process, efforts to update WebFIRE and data submission, and the experiences of data users.

Finally, NACAA encourages EPA to provide resources for developing augmented emissions factors for those SCCs that are currently missing emissions factors and stack test data. The Draft Recommended Procedures should address the use and development of augmented emissions factors to fill existing data gaps. EPA should also compile a set of recommended augmented emissions factors.

Thank you for this opportunity to comment on the review draft. Please do not hesitate to contact either of us or Misti Duvall of NACAA if you have any questions or need further information.

Sincerely,



David Thornton
Minnesota
Co-Chair
NACAA Emissions & Modeling Committee



James Hodina
Cedar Rapids, Iowa
Co-Chair
NACAA Emissions & Modeling Committee