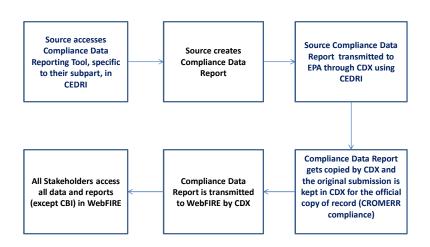
November 15, 2011 Compliance Data Reporting Program

- Require electronic reporting by industry of some existing reports in parts 60, 61, 63, and 65 regulations:
 - Excess emissions reports
 - Summary reports
 - Notification of compliance status reports
 - Performance test reports
 - Continuous parametric monitoring (CPMS) data
 - ► Fence-line monitoring data
- ► Why? We will have recent data for regulation, emissions inventory, emissions factors, and control strategy development, rule effectiveness studies, risk analyses, modelling and compliance assurance
- ► How?
 - Develop revised emissions factors procedures to coincide with e-reporting
 - Develop WebFIRE, the Oracle database that will be the repository for all data reported electronically
 - Revise SCC codes to better reflect processes for which data has been reported
 - Incorporate e-reporting into our rules
 - Develop a data flow process in Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI)
 - Continue to improve Electronic Reporting Tool (ERT)
 - Develop Compliance Date Reporting Rule (CDRR) to require e-reporting in all of our rules
 - Develop e-reporting tools for compliance reports
- Where we are now:
 - E-Reporting (stack test data only) is already included into several rules, including Coal Prep, CISWI, SSI, Boilers, Polymers and Resins I, Pharmaceuticals, and others coming in the future
 - CDX data flow process has been developed and successfully tested and will be ready on Jan. 1, 2012
 - ERT has undergone many enhancements and is ready for prime time (version 4 was recently posted to the web)
 - A draft revised emissions factors procedures document was posted on the web for comment
 - ► WebFIRE is being updated and will allow public access to newly submitted data beginning January 1, 2012
 - Source Classification Codes for industries required to begin e-reporting are being updated
 - Outreach is ongoing; we've talked to NACAA, NESCAUM, AWMA, NEDA/CAP, Regional Offices, OECA, OGC, and others
- Guiding Tenets
 - Do not add to reporting burden
 - Do not develop e-reporting requirements for some rules with little or no relevance

- Eliminate unnecessary reports and/or report elements
- ► Minimize duplicative reporting
- ► Retain S/L and source reporting processes to the extent possible
- ► Take a phased approach
- ▶ Do not require the submission of opacity and similar data
- Develop a system for handling CBI data outside of the e-reporting data flow

Electronic Data Flow



- Considerations
 - We believe ultimately that this rulemaking will save all stakeholders money, effort, and time
 - ► Some S/Ls want to continue to receive the reports and data the way they always received them, so there will be duplicative reporting
 - ► S/Ls want a "holding period" to reconcile performance test reports
 - ► S/Ls are worried we are usurping their authority
 - ► A few S/Ls have adopted ERT
- Next Steps/Schedule
 - ► Finalize emissions factors development procedures
 - Develop user's manual for transmitting source test data into the CDX/CEDRI system to WebFIRE (Dec 2011)
 - ▶ Begin accepting e-stack test data reported electronically (January 2012)
 - Begin developing electronic reporting forms
 - Continue revising the SCCs
 - Begin revising WebFIRE to include data from all electronic data reports and develop reports
 - Publish proposal (May 2012)