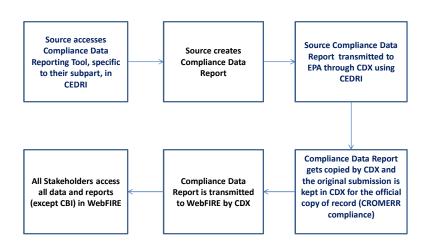
November 15, 2011 Compliance Data Reporting Program

- 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)