United States Environmental Protection Agency

Office of Enforcement and Compliance Assurance

Air Facility System Modernization
ICIS-Air Confirmed Business Requirements Report

WORKING DRAFT

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DOCUMENT CHANGE HISTORY

Version Number	Date	Description
1.0	9/28/2012	Initial Delivery to EPA
1.0.1	10/5/2012	Updated the functional and business rule requirement tables to include the system planned release version for each requirement.

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1.0   INTRODUCTION

All state, local, territorial, and tribal agencies with a delegated air enforcement and compliance assurance program are required to report Air compliance monitoring and enforcement activity to the Environmental Protection Agency (EPA) Administrator through the Air Facility System (AFS). EPA has used AFS since 1990 as the primary repository of national information needed to monitor pollution compliance and aid enforcement at Clean Air Act (CAA) stationary sources.

AFS is owned and operated by EPA's Office of Enforcement and Compliance Assurance (OECA), Office of Compliance (OC), Enforcement Targeting & Data Division (ETDD). The system uses Software AG's ADABAS data management system to manage its data files and the teleprocessing monitor to provide the operating system and the interface between users and programs, via an IBM 3270 terminal connected to a mainframe housed at the National Computer Center (NCC) at Research Triangle Park, NC.

Since the late 1990s, AFS users have expressed increasing dissatisfaction with both the usability and the functionality of the system. AFS does not meet current EPA/State data standards, and its technological platform is considered by the user community to be archaic, cumbersome, and difficult to maintain. Most importantly, there are significant gaps between what is needed to manage the program and what is available from AFS. These weaknesses of AFS reduce the quantity and impair the quality of data that delegated agencies report. They also stop EPA and delegated agencies from using the reported data to its full potential, thus reducing EPA's ability to effectively conduct enforcement and compliance assurance under the CAA stationary source program.

EPA has planned for many years to integrate legacy AFS with the Integrated Compliance Information System (ICIS), which provides web and XML data entry for enforcement and compliance assurance data to EPA and state agencies. ICIS currently has two major modules: ICIS Federal Enforcement and Compliance (ICIS-FE&C), which provides data and support for federal enforcement tracking, targeting, and reporting; and, ICIS National Pollutant Discharge Elimination System (ICIS-NPDES), which provides the ability for ICIS users to manage their NPDES program by tracking permits, limits, discharge monitoring data and other program reports. ICIS-Air will provide the third module to the system.

1.1   PURPOSE

The purpose of this document is to detail the validated requirements from the original modernized AFS System Requirements Specification. The document is intended for review by the entire AFS user community and other stakeholders and will provide the foundation for the detailed Technical Specification containing the design for the modernized system. To that end, this document contains:

- Detailed functional, data, and business requirements
- Notional web screens
- Logical data model.

1.2   ASSUMPTIONS AND CONSTRAINTS

The following are assumptions and constraints that apply to these requirements:

- The non-EPA AFS user community includes state, territory, local, and tribal organizations. The term Delegated Agencies refers to these non-EPA groups as a whole. The term States will be used to specify all the non-local user types (i.e., States, Territories, and Tribes), and the term Local Agencies (LCONs) will be used to specify only local user types.

- ICIS-Air will provide both electronic submission and Graphical User Interface (GUI) capabilities for Delegated Agency users.

- EPA users will primarily use the GUI and in specific instances (e.g., Federal Compliance Monitoring activities) also may have electronic submission capabilities.

- No double data entry of Air data in a separate AFS system can be required for EPA users in the modernized system; thus Air functionality will be incorporated for EPA activities within the existing ICIS-FE&C framework.

- ICIS-Air must adhere to EPA standards for software and hardware development, including the use of the Central Data eXchange (CDX) and EPA data standards.

- EPA has identified a set of minimally reportable data elements, or Minimal Data Requirements (MDRs), to establish a "baseline" for the national air stationary source enforcement and compliance assurance program that will be supported in the system.

- Modifications to the MDR list are subject to review and approval through the Information Collection Request (ICR) process.

- ICIS-Air will contain a set of streamlined data entry screens for Delegated Agency users with system-generation of data elements such as Law/Program selection based on user permissions and system-required entry of only MDR data elements.

- ICIS-Air will share the batch data submittal architecture with the existing ICIS system.

- ICIS-Air will have a reporting infrastructure with Air-only reporting capabilities and separate mixed-media reporting that is shared with the other ICIS modules; the current ICIS reporting infrastructure is contained in Business Objects/Crystal Reports and is supported by several Universes and an Extract, Transform, and Load (ETL) procedure. It is assumed that either ICIS-Air reporting will be incorporated within this infrastructure, or if a new tool is selected, contained in there.

- Align with the Agency's future Enterprise Architecture for Information Technology (IT) resources including data architecture, applications architecture, technology architecture, and security architecture wherever possible.

- The notional screens are models intended to give the users a visual presentation of the data and are not intended to be read as requirements. Changes based on comments are reflected in the applicable Functional, Business, and Data Requirement tables. During the Design Phase, the GUI screens will be finalized.

1.2.1 General Data Organization

ICIS-Air will support the existing AFS data families and add some new ones. These data families are summarized in Table 1.2-1.

Table 1.2-1. ICIS-Air Data Families and Relationships

Data Family	Description
Facility	
Facilities	A distinct real property entity operating at a physical location.
Pollutants	Pollutants regulated by the Clean Air Act that are emitted by a Facility.

Data Family	Description
Programs	The regulatory air program to which a Facility is subject. The regulatory air program authorizing and associated with an action taken by a local, state, tribal or Federal regulatory agency.
CMS	A Compliance Monitoring Strategy (CMS) provides national consistency in developing stationary source air compliance monitoring programs while allowing delegated Agencies flexibility to address local air pollution and compliance problems. The CMS provides a framework for developing stationary source air compliance monitoring programs that focus on achieving measurable environmental results. A CMS outlines core activities for evaluation and recommended frequencies.
Permits	A Permit is issued by permitting authorities to air pollution sources. A single air pollution source can have many permits.
Wood Stoves Models and Certifications	EPA regulates Wood Stoves particulate emissions, which contribute to significant air pollution, under 40 CFR Part 60, Subparts AAA, QQQQ, and RRRR. The certification process requires Wood Stove manufacturers to verify that each of the wood stove model lines meet a specific particulate emission limit by undergoing emission testing at an EPA accredited laboratory.
Incidents	An Incident is an occurrence at the facility that may have an impact on operations or enforcement at that facility, such as a fire or bankruptcy.
Compliance Monitoring Activities	
FCEs/PCEs/ Investigations/ Information Requests	A Full Compliance Evaluation (FCE) is a comprehensive evaluation conducted by a regulatory authority to ensure the Facility meets its compliance requirements. An FCE includes reviews of required reports and the underlying records; assessments of air pollution control devices and operating conditions; observing visible emissions; a review of facility records and operating logs; assessments of process parameters, such as feed rates, raw material compositions, and process rates; and stack tests if there is no other way to determine compliance with the emission limits. An FCE can only occur once per day.
	A Partial Compliance Evaluation (PCE) focuses on a subset of regulated pollutants, regulatory requirements, and/or emission units at a Facility to ensure compliance. Multiple PCEs can occur on the same day to evaluate specific aspects of a Facility.
	An Investigation is limited to a portion of a Facility, involving a more in-depth assessment of a particular issue. It usually is based on information discovered during an FCE, or as the result of a targeted industry, regulatory, or statutory initiative.
	Section 114 letters serve as a mean for EPA to request information such as records, data, or sampling from any person who owns or operates any emission source or who is subject to any requirement of the CAA. Purposes of Section 114 letters are to provide advance notification of an inspection, to obtain information when a full-scale, on-site evaluation is not cost effective, or to facilitate the effectiveness of an evaluation, and in some cases to eliminate the need for an evaluation.
Stack Tests	Stack Tests are a type of compliance monitoring activity performed at facilities to ensure the facilities' compliance with regulatory requirements for emissions limits, or capture or control efficiencies. Delegated Agencies are required to conduct stack tests when there are no other means for determining compliance with the emission limits.
TV ACCs	Title V Annual Compliance Certifications (TV ACCs) are a type of compliance monitoring activity performed by facilities with Title V permits to ensure the Facilities' compliance to regulatory requirements. Facilities are required to submit TV ACCs to the regulating Agency per the schedule outlined in the permit, usually once a year on an Agency-wide basis or on the anniversary of the permit.
CEM/EER	Continuous Emissions Monitoring (CEM) is the continuous measurement of pollutants emitted into the atmosphere in exhaust gases from combustion or industrial processes to ensure that the required reductions of sulfur dioxide (SO_2) and mono-nitrogen oxides (NO_x) under the Acid Rain Program are met, as well as ensuring that emissions exceedences for carbon dioxide (CO_2) and non-criteria pollutants under NSPS, NESHAP, or other Air programs, are identified promptly so corrective measures can be taken at a Facility.
	EPA requires that excess emissions be reported when a regulated air pollutant is released into the environment at a rate that is above the permitted levels for that Facility as outlined in the CEM. When an exceedance of emissions occurs for a pollutant, Facilities are required to submit Excess Emissions Reports (EERs) per report period, usually on a quarterly basis. If no emission exceedences occurred for a Continuous Emissions Monitor or Continuous Emissions Monitoring System (CEMS), the Facility would submit an EER summary report for that reporting period.

Data Family	Description
Alleged Violation Files	
Alleged Violation Files	An Alleged Violation File (AVF) is one module within ICIS-Air that will connect all of the actions that identified or confirmed issues, such an odd Stack Test result, an Excess Emissions Report (EER) showing a very high or lengthy exceedence, a Partial Compliance Evaluation/Full Compliance Evaluation (PCE/FCE) finding; any actions taken to notify the facility, such as phone calls or Notices of Violation; and any addressing and resolving actions, such as Formal Enforcement Actions or closeout memos per Facility.
Enforcement Actions	
Informal Actions	An Informal Administrative Action is generally any communication from EPA or Delegated Agency that notifies the regulated entity of a problem/issue.
Formal Actions	A Formal Administrative Action by EPA or Delegated Agency may begin with notice of violation or with the issuance of an Administrative Order (either with or without penalties) to bring about compliance. These also include Judicial Actions, which are formal lawsuits, filed in court, against persons or entities that have failed to comply with statutory or regulatory requirements or with an Administrative Order.
Final Orders	A Final Order is the document in which the Agency and respondent/defendant settle an Enforcement Action.

Figure 1.2-1 shows the relationship of these data families to each other. In general, a Facility has its own child records:

- Pollutants
- Programs
- CMS
- Permits
- Wood Stoves data
- Incidents.

A Facility can have many activities ranging from Compliance Monitoring to Alleged Violation File (AVF) and Enforcement Action activities. Activities can in turn be linked to each other to show pathways of activities and causal relationships.

Figure 1.2-1. Summary of Data Families and Relationships
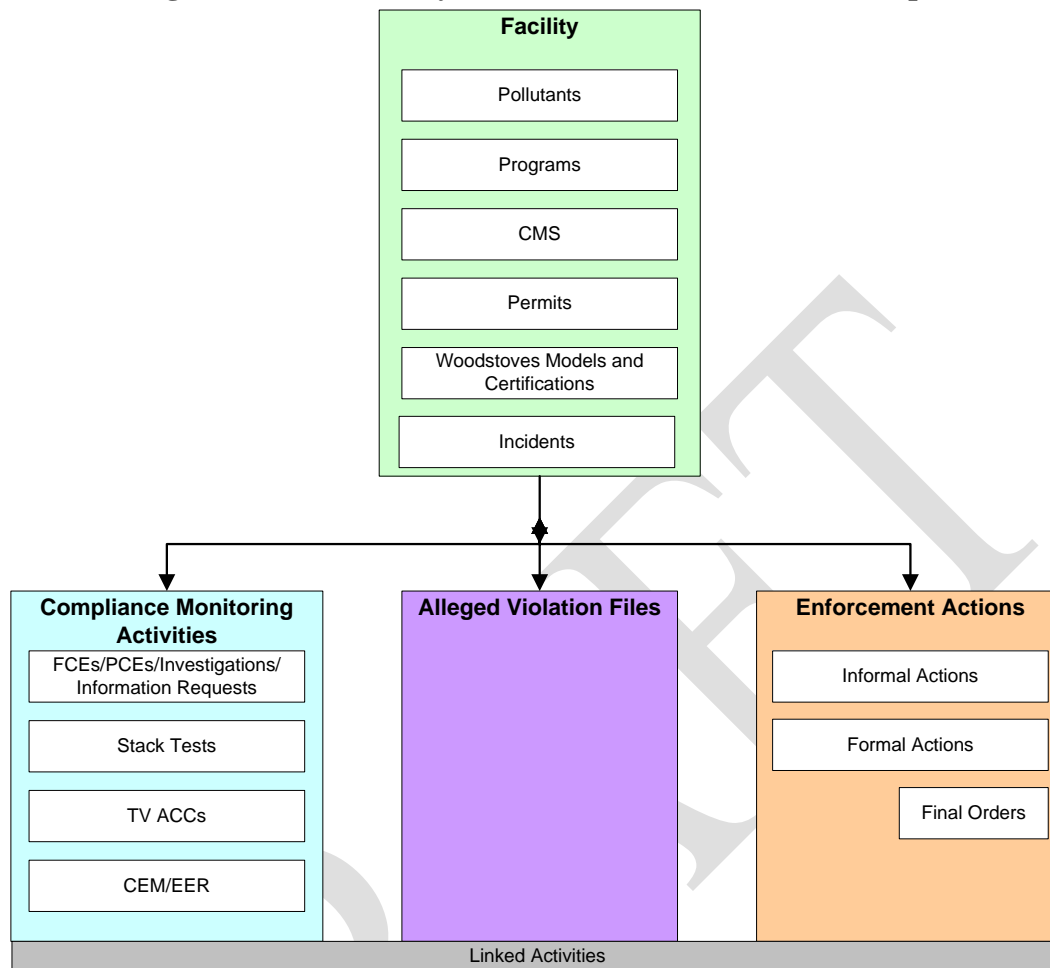
1.3 DOCUMENT OVERVIEW

The following sections comprise the remainder of this Confirmed Business Requirements (CBR) Report:

- **Section 2: Data Entry Overview** – This section provides an overview of the data entry options for online web users and batch electronic data submitters.
- **Section 3: Functional, Data, and Business Requirements** – This section provides the detailed requirements for the AFS modules, including:
  - Facility
  - Compliance Monitoring
  - Alleged Violation Files and Action Linking
  - Enforcement Actions
  - External Interface Systems
  - Minimum Data Requirements
  - Electronic Documents
  - Security

- System Administration
- User Support
- Reports
- Help.
- **Appendix A: Logical Data Model** – This section provides the logical data model for ICIS-Air based on the detailed requirements.
- **Appendix B: Tier 3 Comments** – This section provides a list of the comments received during the Tier 3 review and Critical Requirements Review of the requirements and the disposition of those comments. It also includes the comments received from the review of the Interim Updated System Requirements Specification (SRS) document and the draft version of this CBR Report.
- **Appendix C:** Webinar Comments Summary
- **Appendix D: Acronyms** – This section provides a list of all acronyms used in the document.
- **Appendix E: EPA SRS Requirements Not Mapped to CBR Requirements** – This section provides a list of all requirements in the original EPA SRS document that are not mapped to requirements in the CBR report.
- **Appendix F: Minimum Date Requirement (MDR) List**

2.0   DATA ENTRY OVERVIEW

It is important to have a high-level understanding of the user community's interaction with legacy AFS to ensure the modernized system continues to support the users. A major distinguishing factor of the users is the method by which they input data to legacy AFS including:

1. Direct Data Entry: Entry of data into AFS using the mainframe interface.
2. Direct Batch Submission: submission of AFS flat file format batches of data to the mainframe.
3. Batch Submission via the Universal Interface (UI): Use of the Universal Interface tool to generate AFS flat files for submission of batches of data to the mainframe.

While most of the Delegated Agencies have their own systems for tracking CAA compliance and enforcement data, there are some, such as the Virgin Islands, that solely use AFS. Figure 2.0-1 shows that 62% of Delegated Agencies directly enter data into legacy AFS, and 83% of data related to Major Facilities is entered through either direct or UI batch submissions. So while the majority of the data are submitted via batch, there is a significant user population (mostly the small Agencies) that relies on direct data entry to provide EPA with their CAA compliance and enforcement data rather than building a batch data submission process.

Figure 2.0-1. Legacy AFS Data Input Methods
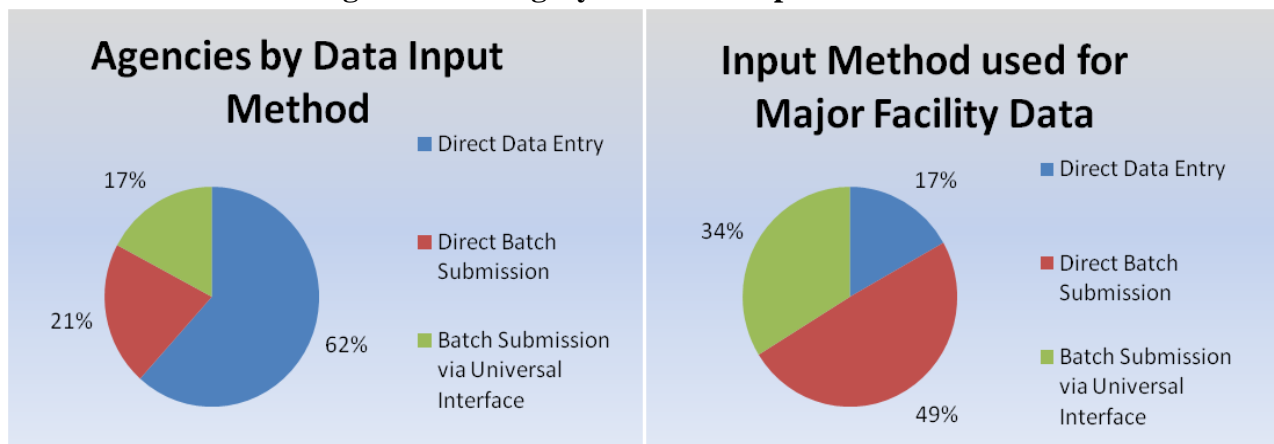
Given this user community makeup, ICIS-Air will support both direct and batch data submission. Direct data entry will be supported through a web-based GUI, and batch electronic submission will be performed through submission of eXtensible Markup Language (XML) files through EPA's CDX. The following two sections provide more details about the web and batch electronic data submission approaches.

2.1 WEB APPROACH

Users will be able to log in to a user-friendly, web-based GUI and perform functions such as:

- Access home pages
- Add a new record
- Edit an existing record
- Delete duplicate or unwanted record (delete privileges will be tightly controlled as in legacy AFS)
- Search and retrieve or jump to records.

The system will have a role-based access model that will restrict functionality and data based on user profile, geography, and program. For Delegated Agency activities and Air-specific screens, reference data will be defaulted to Air Program values, and the system will default certain data based on users' profiles to minimize data entry (e.g., Agency will default to the user's Agency based on the user's profile).

AFS will be modernized within the existing ICIS infrastructure using the following principles:

- One database with some shared tables and some Air-only tables
- A similar look and feel throughout ICIS and AFS
- A set of streamlined data entry screens for Delegated Agency users with system-generation of Law/Program selection based on user permissions and system-required entry of only MDR data elements
- A single set of data entry screens for EPA users in ICIS-Federal Enforcement and Compliance (FE&C), replacing the double data entry currently required of EPA air data in legacy AFS and ICIS-FE&C.

This Confirmed Business Requirements (CBR) Report contains notional screens depicting a possible look and feel and data element organization for users to review from a requirements

perspective. During the detailed design phase of the project, these notional screen templates will be finalized for the actual ICIS-Air screen design. Detailed notional screens for each module are presented in Section 3, the following figures provide the notional home page arrangement and some common web features users will see throughout the modernized system.

2.1.1 Home Pages

ICIS will contain three major modules:

- ICIS-FE&C for EPA users to access a multimedia federal enforcement and compliance data view of the system
- ICIS-NPDES for EPA and State NPDES users to access a NPDES-centric view of the system
- ICIS-Air for EPA and Delegated Agency Air users to access an Air-centric view of the system.

Some users will be able to access only a single module (e.g., LCON users), while other users will be able to access multiple modules (e.g., EPA users, State users with both Air and NPDES privileges). Multiple module users will have a landing page on which they can select the view they wish to use, while single module users will skip the landing page and be taken directly to their own home pages. Note: the home pages will be redesigned to display system news and alerts.

Figure 2.1-1 shows the notional landing page for multi-module users.

Figure 2.1-1. Notional Landing Page for Multi-Module Users

Figure 2.1-2 shows the notional Air home page for EPA users. Highlights of the screen include:

- Access to data entry modules, reporting, and system functions such as changing password
- "Jump To" functions that allow a user to enter the unique identifier for a record and be taken directly to the edit screen for that record, rather than needing to search for the record first
- Search access to allow users to search for records based on a wide selection of input criteria with a visual search results list to help users ensure they are accessing the correct record

- Add functions that provide the ability to create new records; streamlined Delegated Agency screens can be accessed directly if EPA is assisting in data entry.

Figure 2.1-2. Notional Air Home Page for EPA Users

Figure 2.1-3 shows the notional Air home page for State users. This home page contains the same functions as the EPA page but provides the opportunity to enter only State data.

Figure 2.1-3. Notional Air Home Page for State Users

Figure 2.1-4 shows the notional Air home page for LCON users. This home page contains the same functions as the EPA page but provides the opportunity to enter only LCON data.

Figure 2.1-4. Notional Air Home Page for LCON Users

Some state users will be granted the privilege to assist their LCONs with data entry. Figure 2.1-5 shows the notional Air home page for state users with this privilege. This home page contains the same functions as the State page and also provides the opportunity to enter LCON data.

Figure 2.1-5. Notional Air Home Page for State Users with the Privilege to Enter LCON Data

2.1.1.1 Breadcrumbs, Tabs, and Links

Users will be able to quickly navigate between screens by clicking on tabs, links, and "breadcrumbs." Breadcrumbs will reveal the user's location and allow users to trace the path back to the original point.

Delegated Agency users will see an Air-only tab set, while EPA users will see a broader set including the existing FE&C capabilities and the new Air-only functionality (e.g., Title V Annual Compliance Certifications). Tabs will be displayed based on a combination of the user's geography (i.e., EPA or Delegated Agency) and the module in which the user is working.

Figure 2.1-6 shows notional breadcrumbs, tabs, and links for a Facility edit screen.

Figure 2.1-6. Notional Breadcrumbs, Tabs, and Links
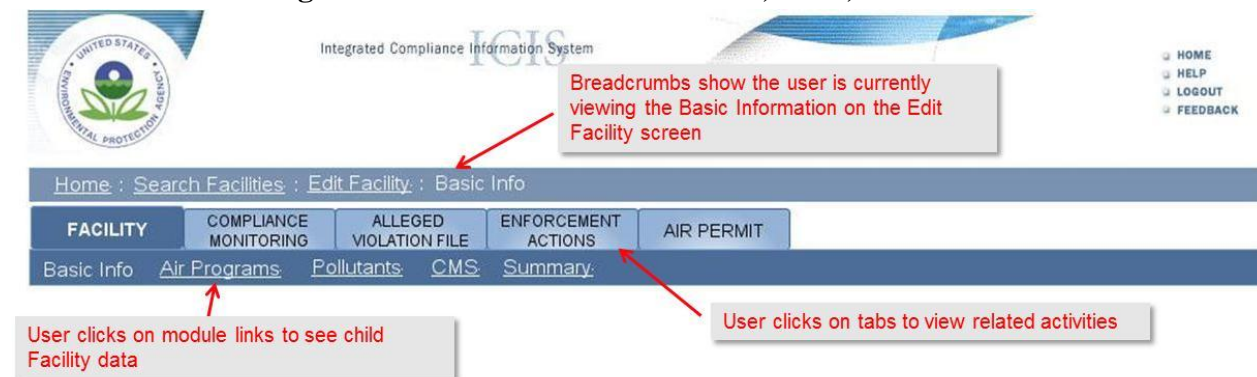
2.1.1.2 GUI Features

The web GUI has many features that are different from the mainframe. These features, such as headers, pick lists, date calendars, will be implemented consistently across the ICIS-Air Add and Edit screens. Figure 2.1-7 shows a notional edit screen highlighting some of the common GUI features. Note: Many notional screens are split across pages in this document, but will be one continuous screen in the application.

Figure 2.1-7. Notional Edit Screen with GUI Features

2.1.1.3 Search and Search Results

Users will have search and search results screens to assist in locating records for editing, copying, and deleting or to determine if a record already exists before adding a new record. Search results screens will provide identifying data for records and privilege-based access to functions such as Add, Copy, and Delete. The results will have default sorts that can be overridden by clicking on underlined column headers to resort the results by the selected column.

Figure 2.1-8 shows a notional compliance monitoring search screen, and Figure 2.1-9 shows a notional compliance monitoring search results screen.

Figure 2.1-8. Notional Compliance Monitoring Search Screen

Figure 2.1-9. Notional Compliance Monitoring Search Results Screen

2.2 COMMON FUNCTIONS

Many modules will share common functions. The following sections describe how these functions will be implemented across the system.

2.2.1 Common Functional Requirements

Table 2.2-1 lists the requirements that apply to common functions within ICIS-Air. It includes functions that are allowed and business rules within a function.

Table 2.2-1. ICIS-Air Common Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	N/A	SME Meeting	The system shall display data entry screens based on user roles and privileges where applicable.	ICIS-Air version 1.0
2.	5.21.2	EPA SRS, SME Meeting	The system shall provide Federal EPA users access to the modernized system through the existing FE&C landing page and select the Air system home page.	ICIS-Air version 1.0
3.	N/A	SME Meeting	The system shall provide Federal EPA Air users the ability to see both shared FE&C screens and Air-only screens.	ICIS-Air version 1.0
4.	N/A	SME Meeting	The system shall provide a quick search capability to search Facility, Permit, and Activities.	ICIS-Air version 1.0
5.	N/A	SME Meeting	The system shall have a table with reusable contacts and addresses that users will be able to associate with Facilities and Activities.	ICIS-Air version 1.0
6.	N/A	SME Meeting	The system shall have the ability to enter multiple comments for all activities.	ICIS-Air version 1.0
7.	N/A	SME Meeting	The system shall allow the user to flag an individual comment has enforcement sensitive.	ICIS-Air version 1.0
8.	N/A	SME Meeting	The system shall default each comment to enforcement sensitive.	ICIS-Air version 1.0
9.	N/A	SME Meeting	The system shall allow users with enforcement sensitive access to change an enforcement sensitive comment to non-enforcement sensitive.	ICIS-Air version 1.0
10.	N/A	SME Meeting	The system shall not allow users with Edit privileges on the record to modify comment text entered by other users.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
11.	N/A	SME Meeting	The system shall provide graphical interface with tabs, links, and breadcrumbs for navigation.	ICIS-Air version 1.0
12.	N/A	SME Meeting	The system shall display the navigational tabs based on a combination of the user's roles and the module in which the user is working.	ICIS-Air version 1.0
13.	5.27.1, 5.27.4, 5.28.1, 5.28.2	EPA SRS	The system shall adhere to the minimum performance and availability standards of the current ICIS standards.	ICIS-Air version 1.0
14.	5.2.7	EPA SRS	The system shall allow a user to do on-line direct data entry.	ICIS-Air version 1.0
15.	5.31.1, 5.31.2	EPA SRS	The system shall conform to International, National, Federal, Exchange Network and EPA data standards for data element names, formats and XML tags, if applicable.	ICIS-Air version 1.0
16.	N/A	SME Webinar	The system shall enforce the Enforcement Sensitive status of individual comments if the record is Not Sensitive.	ICIS-Air version 1.0
17.	N/A	CRR Adjudication	The system shall enforce the Enforcement Sensitive status of the group of User Defined Fields if the record is Not Sensitive.	ICIS-Air version 1.0
18.	N/A	CRR Adjudication	The system shall allow the user to save multiple search criteria sets.	ICIS-Air Future Release
19.	N/A	CRR Adjudication	The system shall allow the user to edit a saved search.	ICIS-Air Future Release
20.	N/A	CRR Adjudication	The system shall allow the user to delete a saved search.	ICIS-Air Future Release
21.	N/A	CRR Adjudication	The system shall allow the user to search data from a saved search criteria set.	ICIS-Air Future Release
22.	N/A	CRR Adjudication	The system shall display the search criteria on the Search Results screens.	ICIS-Air version 1.0
23.	N/A	CRR Adjudication	The system shall allow the user to narrow the results of activities eligible to link.	ICIS-Air version 1.0

2.2.2 Linking

A key function in the system is the ability to link activities for the same facility to each other to show relationships between these activities. One of the main uses of activity linking is in tracking Alleged Violation File (AVF) key milestones, but users may also wish to show that some activities led to others, such as a failed Stack Test that would accelerate the timeframe that a Full Compliance Evaluation (FCE) was completed or an FCE comprised of multiple Partial Comliance Evaluations (PCEs). To support this functionality, each module will have a screen that shows the activities that are currently linked to the record in question and supports unlinking, and a screen that allows the user to search for and link additional activities.

The screens that show activities linked to a record have the following components:

- Listing of all linked activities including unique identifiers and descriptive data
- Ability to select each individual record or using the select all functions for unlinking
- Links to view the linked records
- The ability to list more records that are eligible to link.

Figure 2.2-1 shows a notional list of linked activities for an enforcement action (the main enforcement action record's key data are in the dark blue header bar).

Figure 2.2-1. Notional Enforcement Action List of Linked Activities

The screens that show activities linked to a record have the following components:

- Listing of all activities eligible for linkage including unique identifiers and descriptive data
- Ability to select records one at a time or using select all functions for linking
- Links to view the eligible records
- The ability to add a new record that will be automatically linked to the initial record.

Figure 2.2-2 shows a notional list of eligible activities for an enforcement action (the main compliance monitoring record's key data are in the dark blue header bar).

Figure 2.2-2. Notional Compliance Monitoring List of Eligible Activities

All modules wil̶l̶ ̶[...] have an enhanced linking [...] e 2.2-2 lists the activities that ca̶ [...]

T̶ [...] .

Entity	Linkages
FCEs, PCEs, Investigations, Information Requests	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
Stack Tests	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
TV ACCs	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
CEMs/EERs	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
Wood Stoves	FCEs, PCEs, Investigations, Information Requests Alleged Violation Files Enforcement Actions
Alleged Violation Files	FCEs, PCEs, Investigations, Information Requests

Entity	Linkages
	TV ACCs
	Stack Tests
	CEMs/EERs
	Enforcement Actions
Enforcement Actions	FCEs, PCEs, Investigations, Information Requests
	TV ACCs
	Stack Tests
	CEMs/EERs
	Alleged Violation Files
	Enforcement Actions

2.2.3 Contacts and Addresses

Users will be able to associate both governmental and non-governmental contacts and addresses to modules. The system will have reusable tables of these contacts and addresses (see System Administration for the screens for administering these tables), and for non-governmental contacts, users will be able to directly update those tables at the time of data entry. Contacts and addresses will be listed with an affiliation (e.g., Inspector, Facility owner) on the module screens.

Figure 2.2-3 shows the notional contacts list screen on a module.

Figure 2.2-3. Notional Contacts List Screen

2.2.4 Comments

All ICIS-Air modules will have the ability to enter multiple comments. These comments will default to Enforcement Sensitive and can be changed to non-Enforcement Sensitive by the user. The screens will use a common design to list the existing comments. A "Manage Comments" option will allow users to manage the comment list by adding new comments, editing their own comments, or deleting their own comments. The user will be able to edit an existing comment by clicking the hyperlinked "Entered By" date. Figure 2.2-4 shows a notional comment list screen as incorporated in a module screen.

Figure 2.2-4. Notional Comment List Screen

2.3   BATCH ELECTRONIC DATA SUBMISSION APPROACH

ICIS-AFS will use the same XML-based functionality as ICIS-NPDES to transfer data. As in the Legacy system, ICIS-Air batch capability will leverage the core operations and business rules that exist in the online web application. The modernized system will utilize EPA's Central Data Exchange (CDX) to conduct preliminary checks before submitting the data to ICIS.

Users will compose their transactions into predefined eXtensible Markup Language (XML) formatted files (individually or in a zip archive file) and submit them to EPA's CDX. CDX performs important functions such as authenticating the submitters prior to making the XML files available for processing, scanning for viruses, validating the submitted file against approved XML schemas, and archiving all XML files. A web service is deployed in the ICIS environment to receive XML files from CDX. In particular, the ICIS Batch web service publishes a *submit* method to receive XML files from CDX. ICIS is responsible for receiving the XML files, parsing data contained in the XML files, sequencing the transactions, and then processing each designated batch through the ICIS service tier to store acceptable data into the ICIS database. Finally, ICIS records the batch processing results and sends the processing status and results back to CDX for submitters to download the results.

A batch is typically comprised of one or more XML files, and each file may contain multiple data families with records, called payloads, of different transaction types.

2.3.1   Summary of Batch Modernization in ICIS-Air

Some Batch functionality has been changed from how it operated in legacy AFS to better align the system with the submitting party's business needs and changing technologies. In the Legacy AFS, submitting parties had two ways of submitting data electronically: direct batch submissions and batch submissions using the Universal Interface (UI) to perform data validation and transaction file creation. A summary of such changes follows:

- **eXtensible Markup Language**

Legacy AFS provides an ASCII Flat File import format. ICIS-Air will use the industry standard XML batch format as required by the Exchange Network.

- **Unique Identifiers for Identifying Batch Data**

Legacy AFS used the following kinds of data elements as key data: Facility Identifier, Permit Identifier, and Action Identifiers. This posed a challenge for batch submitters, as the data stored in Legacy AFS – especially action identifiers – do not coincide with the data stored in the individual Delegated Agency systems. To compensate, Legacy AFS required Agencies to submit the number generator trigger (all 9's) and let AFS generate the next available action identifier.

ICIS-Air will use a model that will guarantee uniqueness of data through the combination of identifiers and key data. In the modernized system, Agencies will be responsible for supplying unique identifiers following a common scheme that will guarantee uniqueness of data in ICIS-Air. These identifiers will be used in ICIS-Air to uniquely identify the records. In ICIS-Air, submitting parties sending data electronically will have Action linking capabilities by embedding the information in the submitted data files; this will be addressed on a module by module basis. The agencies themselves will be expected to provide the unique keys, providing a more streamlined process than Legacy AFS.

For example, rather than using an Action Identifier to identify an FCE, the FCE could be identified through the combination of Facility ID, Compliance Monitoring Type, and Actual End Date (all of which are already required to be submitted with the transaction). This will be done for FCEs because the business rules allow submittal of only one FCE per day per facility. Unique identifiers can be created for other modules using similar decision processes.

- **Compare Pre-processor and Types of Transactions**

Legacy AFS allowed submitting parties to generate a data file of transactions without a transaction code. This file, which contains a super-set of data, was then submitted to the Compare Pre-processor module in AFS. The Compare Pre-processor generated Add and Change transaction codes for all the records in that file by comparing the keys to the submitted file to the keys in the data base. The resulting data file must then be sent by the submitting party.

ICIS-Air will require that submitters designate the type of transaction through the assignment of a Transaction Code, embedded within the XML file for each parent record. In addition to the New, Change, and Delete transaction types, a Replace transaction type will be available to add the record if it does not exist or to over-write an existing record in instances in which the source Agency is unsure whether the record already exists in ICIS-Air. Unlike the Compare Pre-processor, the modernized Batch system will not to detect deletes for the submitting party. A summary of transaction types and their functionalities follows:

- **New transactions** – establishes new record in ICIS-Air in the absence of an existing record with the same key. If an ICIS-Air record exists with the same key, the New transaction will fail.
- **Change transactions** – find the existing record in ICIS-Air and change only the data for the fields provided with the transaction. The submission of asterisks can be used to blank out specific data fields. If an existing record cannot be found, the Change transaction will fail.

- **Delete transactions** – find the existing record and delete it only if no child record or links to other records exist or if certain child records or links to other records exist. If an existing record cannot be identified, the Delete transaction will fail.
- **Mass Delete transactions** – find the existing record in ICIS-Air and delete it and all of its child records and possibly related records, if certain child records or links to other records exist. If an existing record cannot be found the Mass Delete transaction will fail.
- **Replace transactions** – act like New transactions if no matching record is found within ICIS-Air or act like Change transactions if records are found. If an existing record is located, all of that record's data will be replaced with the data in the submitted transaction; optional tags missing from the XML submission will result in their corresponding ICIS-Air fields being deleted.

- **Audit Reports**

  The error reporting for direct electronic data submission will provide user friendly English "language messages using keys comprised of unique identifier fields for easy identification of rejected records and listings of multiple errors for the same record. The modernized system will provide options for delivering the error reports in XML and Portable Document Format (PDF) format electronically through CDX or within the application as a standard report format to allow delegated Agencies to display or parse the errors in their state system.

- **Data Validation (Edit and Update)**

  The direct electronic data submission process in Legacy AFS contains an optional Edit step that performs data validation without committing the data into the system to identify potential errors. If errors are found, submitters can correct the data in their state systems, regenerate the data file and repeat the submission process. The Update function uses the same business logic as the Edit process but actually commits the transactions to the database. Edit capability will not be carried forwards to the modernized system, as it is not a frequently used function and did not guarantee a successful update transaction. Errors were frequently encountered in the Edit step when submitting parties would attempt to submit a parent and child record simultaneously, as a child record will cause the transaction to be rejected because its parent does not exist in AFS. In ICIS-Air, data validation for batch submissions will be directly performed by the ICIS-Air application using a single instance of the business rules. Error messages will be enhanced from the current AFS and UI messages and will be delivered in a timely manner, in multiple formats by using the CDX data transfer infrastructure. Additionally, ICIS-Air will have a test environment for submissions.

- **Universal Interface**

  Legacy AFS offered a Universal Interface (UI) middleware application to help submitting parties compose batch transactions in flat file formats for AFS. This tool assisted submitting parties by providing a graphical user interface that was less code driven than the mainframe. It also assisted submitting parties by allowing them to map their data directly to the UI format, providing pre-validation with user-friendly error messaging, and assisting in action identifier generation and identification. The UI worked by having the submitting party first map their data to the UI format, import data from their systems into the UI, perform manual data manipulations, pre-validate the data, and then export an AFS flat file that could be loaded into the AFS batch process.

In the modernized system, a separate UI application containing duplicate business rules and data sets will not be necessary, as ICIS-Air will incorporate all the features available to Agencies through the UI in a single application. Table 2.3-1 provides a summary of the UI functionalities to be embedded into the modernized system follows:

Table 2.3-1. ICIS-Air Embedded UI Functionality

Title	Solution
Data Validation	Data validation for batch submissions will be directly performed in ICIS-Air using a single instance of the business rules. Error messages will be enhanced from the current UI messages and will be delivered in a timely manner, in multiple formats by using the CDX data transfer infrastructure.
Unique Identifier Generation	ICIS-Air will update the unique identifiers used to identify records in batch transactions. They will be a combination of data already required to be submitted in a transaction (e.g., the Facility ID) and, where necessary, an Agency-generated identifier that allows the Agency to track exactly what was sent to ICIS-Air. This will remove the need for a separate user interface for identifying and numbering records.
Create Delete Transactions	For direct users, ICIS-Air will provide user interface pages to delete records. Electronic submission users will be able to submit delete transactions in their data files or log into the application to search for and delete records.
History Function	Users will have access to ICIS-Air when submitting electronically, and will have unique identifiers in their systems to identify records in ICIS-Air. Thus a separate history function will no longer be required.
Browse Capability	ICIS-Air will provide functionality to browse data in the system.
Storage of CEM Data	ICIS-Air will be designed to provide this functionality pending finalization of the rulemaking and requirements.
Output Transactions	This functionality is redundant in ICIS-Air since there will be no separate UI application.
Security	ICIS-Air will be designed to have a role based access model that will restrict functionality based on the user's role and privileges.
Performance	A February 2012 Batch submission of NPDES data contained 46,297 transactions, which took 7 minutes to parse and 34 minutes to process

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Batch transactions in ICIS-Air.

2.3.2 Batch Functional Requirements

Table 2.3-2 lists the requirements that apply to Batch transactions. It includes functions that are allowed and business rules within a function.

Table 2.3-2. ICIS-Air Batch Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.22.1	EPA SRS	The system shall support the sending, receiving, and processing of batch data through CDX.	ICIS-Air version 1.0
2.	N/A		The system shall allow the user to submit .zip file formats.	ICIS-Air version 1.0
3.	5.19.1	EPA SRS	The system shall allow System Administration the ability to create a report that lists all batch uploads by a user over a specified time period using transaction timestamps.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
4.	5.19.4, 5.20.2	EPA SRS	The system data conversion procedures and file format definitions shall incorporate standard data definitions and naming conventions to facilitate data transfers between state and federal system and promote consistently defined data at the national level (i.e., shall be valid against the XML schema).	ICIS-Air version 1.0
5.	5.20.1	EPA SRS	The system shall have the ability to track submission history.	ICIS-Air version 1.0
6.	N/A		The system shall allow a batch file to contain multiple records.	ICIS-Air version 1.0
7.	5.22.1	EPA SRS	The system shall utilize Web Services to communicate between ICIS and CDX.	ICIS-Air version 1.0
8.	N/A		The system will process each combination of submission type and transaction type as a unique transaction.	ICIS-Air version 1.0
9.	5.22.1	EPA SRS	The system shall generate one notification message when the system finishes processing a batch transaction and send the notification back to CDX to indicate the audit reports that are available for the user to review online and in CDX.	ICIS-Air version 1.0
10.	5.22.1	EPA SRS	The system shall generate online audit reports, accessible to the user via the ICIS application.	ICIS-Air version 1.0
11.	5.22.1	EPA SRS	The system will generate the following reports: • Rejected Transaction Report • Accepted Transaction Report • Summary Report.	ICIS-Air version 1.0
12.	N/A		The system shall sort the transaction types and submissions inside a batch transaction using a modified ICIS sorting algorithm to preserve data integrity by ensuring data is processed in the proper order.	ICIS-Air version 1.0
13.	N/A	Comment Adjudication 8/10/2012 & 8/24/2012	The system performance for batch processes shall adhere to current ICIS performance standards.	ICIS-Air version 1.0

2.3.3 Batch Business Rule Requirements

Table 2.3-3 lists the business rules requirements that apply to Batch. This table includes the business rules for data elements and error handling. Business rules enforced during electronic data submission will be addressed in module-specific requirements analyses.

Table 2.3-3. ICIS-Air Batch Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The Batch must be unique within the system. A Batch is uniquely defined by the system-generated Batch Transaction ID.	ICIS-Air version 1.0
2.	N/A	There must be only one Batch Identifier (ID) for each Batch transaction.	ICIS-Air version 1.0
3.	N/A	The system shall require that all Transaction Types submitted are valid. Valid Transaction Types are N (New), C (Change), R (Replace), X (Mass Delete), D (Conditional Delete).	ICIS-Air version 1.0
4.	N/A	The system shall require that the record does not exist when the following Transaction Types are submitted: N (New).	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
5.	N/A	The system shall require that the record exist when the following Transaction Types are submitted: C (Change), X (Mass Delete), D (Conditional Delete).	ICIS-Air version 1.0
6.	N/A	The system shall require that user has the privileges to perform the transaction.	ICIS-Air version 1.0
7.	N/A	The system shall require that all key data elements are submitted and valid.	ICIS-Air version 1.0
8.	N/A	The system shall require that all non-key data elements are valid.	ICIS-Air version 1.0
9.	N/A	The system shall require that all submitted reference table values exist and are active in the appropriate ICIS reference table(s).	ICIS-Air version 1.0
10.	N/A	The system shall require that all required fields, for New and Replace Transaction Types, be submitted in order for a transaction to be saved in ICIS.	ICIS-Air version 1.0
11.	N/A	The system shall verify that the XML conforms to expected Schema requirements.	ICIS-Air version 1.0
12.	N/A	The system shall verify the batch data against the business rules that apply to the particular submission type.	ICIS-Air version 1.0

2.3.4 CDX – ICIS Interface

Figure 2.3-1 illustrates the submission of XML to CDX, the process performed on those submissions by CDX and ICIS, and the interface between CDX and ICIS.

Figure 2.3-1. ICIS XML Submission Processing
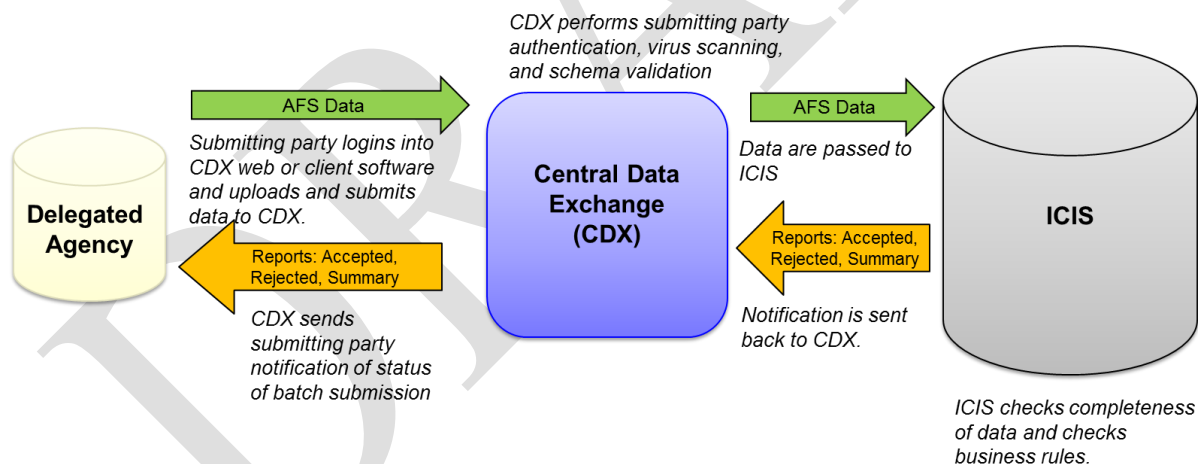
Interface Between User and CDX

All batch submissions to ICIS will go through CDX manually or electronically using a Network Authentication and Authorization Service (NAAS) account. When CDX receives a batch submission, it will first authenticate the submitter. If the authentication fails, CDX will reject the batch submission. After CDX verifies the submitter is a valid user, CDX will scan batch submission for viruses and validate it against the XML Schema (applies to the XML format only), CDX will then send an acknowledgement of receipt to the submitter and archive this batch submission prior to forwarding it to ICIS. If CDX is unable to perform any of these validations, it will reject this batch submission and send an error notification to the submitter. If the XML

Schema validation fails, CDX will stop the batch process and notify the user about the failure and request that the batch submission be resent. The user must find the cause of the failure and fix it prior to resending the batch submission.

Interface Between CDX and ICIS

When ICIS receives a batch submission, it will check the completeness of the batch submission. If the batch submission is incomplete, ICIS will notify CDX and request that the batch submission be resent. If the batch submission is complete, ICIS will perform the data validation process and business rules checking. If the batch submission passes the data checking, ICIS will send CDX an acknowledgement of receipt.

ICIS will run business rules checking for all valid batch submissions. For live edits, ICIS will run the update process that will store all data elements in all successful transaction units[1] contained in the batch submission into associated tables in the database.

When the entire batch process is completed, ICIS will send CDX a notification message that will indicate the batch audit reports or XML version of the batch audit reports and XML batch response files are available for the user to review online.

Interface Between CDX and User

When CDX receives the notification message and audit reports, it will send a notification e-mail to the batch user. An email notification will also be dispatched informing users of the status of their transactions once they have been processed. Additionally, the batch user can login to the ICIS web application and view the audit reports online. Users can also directly access the report via CDX, without having to access the ICIS application. It is the user's responsibility to correct and resend failed transactions listed in the audit reports to CDX for the data to be processed in ICIS. See Section 2.3.2, Batch Functional Requirements, and Section 2.3.3, Batch Business Rules, for more details.

2.3.5   Batch Submission

See the data elements in Section 2.3.2 and business rules in Section 2.3.3 for more details on rejecting Batch transactions.

XML File Batch Processing

- A User submits a File to the CDX Node
- ICIS receives the File from CDX and saves the batch and file data in the ICIS Batch tables
- ICIS parses the received file payload data into separate transactions in the ICIS Batch tables
- The parsed transactions are sent to the ICIS Application for processing, and data are either saved in the ICIS Batch tables or error messages are saved in the ICIS Batch tables.

XML data flow into ICIS follows a coordinated process with CDX according to a pre-arranged contract. The basic process is outlined below:

1. CDX: Authentication of a registered CDX submitting party
2. CDX: Submission of batch files to CDX
3. CDX: XML schema validation and approval of batch file submissions

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[1]   A transaction unit is a submission type with a transaction type (e.g., add a facility, edit a permit).

4. ICIS: Download of approved file submissions from CDX through the web-services interface
5. ICIS: Validation of batch submission files received from download
6. ICIS: Authentication of the submitting party credentials in the header of each batch submission file
7. ICIS: Queue and sort all transactions in each approved submission file by batch and transaction type for execution
8. ICIS: Processing, execution, and logging of all individual transactions queued from the batch
9. ICIS: Sending of the processing status message back to CDX through the web-services interface
10. CDX: Notify submitting party via notification email.

XML File Submission to CDX using CDX Web Application

Steps for Submitting a File to CDX

1. Access CDX site
2. Login with Username. Enter password.
3. Click on the hyperlink for the AFS data flow
4. Upload the data file
5. Submit the data file by clicking "Send"
6. CDX web upload form will allow the submitter to download their results if they use the Source/Full Batch name value pair[2]

2.3.6 XML Design

XML is used to markup documents containing structured information for data exchanges. XML is a text-based syntax that is readable by both computer and human and is a standard data interchange format for users, CDX, and ICIS to exchange data across different platforms.

The following two components are commonly used for transferring data between different systems using XML technology:

- **XML Instance File:** The XML formatted file that contains the actual submission data.
- **XML Schema:** XML files that provide rules to interpret and validate data contained in an XML instance file. ICIS batch users will use XML Schema developed for AFS and registered in the EPA's XML Registry to validate their data before submitting to ICIS.

XML Schema

An XML Schema defines the structure of an XML document. This definition includes what elements are expected; what the attributes for any data element may be; and the number of occurrences of each data element, data element type and length, acceptable values for each data element, etc. Taken as a whole, the Schema is a definition file that provides a mechanism for both human and computer to interpret information contained in a document.

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[2] Value pair is standard XML terminology, which refers to fields that are available to the user that, when populated, will send the results of the batch transaction via email. This is how the submitting party receives notification from CDX during the batch transactions when the transaction were received and passed. If the user does not provide this information within the XML file, CDX will not "autopopulate" the user information and send a response.

The XML Schema is very dependent on namespaces. Basically, the namespaces indicate the locations of the Schema files that contain validation rules and are considered to be the solution to problems of ambiguity and name collisions (elements with the same name).

From a practical point of view:

- An XML Schema contains validation rules to ensure the XML data file is well-formed and valid.
- An XML file is a data instance of a Schema.

ICIS has the following submission rules:

- Each XML instance file can contain the data for multiple submission types, each identified by a separate payload. The batch user can enter various transaction types in one file.
- Batch users compress multiple XML instance files into one batch submission (e.g., one zip file).
- ICIS will use batch identification assigned by CDX to track any information that is pertinent to a batch submission. When submitting multiple XML instance files in one batch submission, if users enter the same batch identification in every XML instance file, ICIS will treat each Batch ID as one single batch submission. All key data elements for each submission type must be submitted. To add, edit, or delete a particular record in the ICIS database, the record must be uniquely identified during batch operations.
- When the batch user submits a Change or Replace transaction, ICIS will allow the batch user, using a "*", to indicate that the value of a data store in ICIS to be erased. When a user submits a New, Mass Delete, or Delete transaction the "*" are ignored.
- Empty tags (e.g., <FirstName></FirstName>) in the XML instance file are not allowed. Additional null tags are not allowed (e.g., <FirstName/><FirstName/>.
- To support Link or Unlink functions, ICIS allows batch users to enter Link and Unlink data as part of the Add or Edit Transaction. In the XML Schema structure, there are Link and Unlink data sections, which contain the key data elements of the objects to be linked to or unlinked from.
- To perform the Link function, batch users will enter the value of the key data elements of the object to be linked to in the "Link" section. The linked object must exist in the system already; otherwise, this transaction will be rejected.

Figure 2.3-2. ICIS-NDPES XML Instance File is a sample XML instance file

Figure 2.3-2. ICIS-NDPES XML Instance File

```
<Document xmlns="http://www.exchangenetwork.net/schema/icis/1"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="http://www.exchangenetwork.net/schema/icis/1
..\..\..\..\Schema%20v4.0c\ICIS_v4.0c.xsd">
  <Header>
    <Id>SCTester</Id>
    <Property>
      <name>e-mail</name>
      <value>miller_stephanie@bah.com</value>
    </Property>
      <name>Source</name>
```

```
        <value>FullBatch</value>
      </Header>
    </Header>
<Payload Operation="InformalEnforcementActionSubmission">
<InformalEnforcementActionData>
        <TransactionHeader>
          <TransactionType>C</TransactionType>
        </TransactionHeader>
        <InformalEnforcementAction>
          <EnforcementActionIdentifier>SC-IEA000052</EnforcementActionIdentifier>
          <PermitIdentifier>SCIEC0502</PermitIdentifier>
          <EnforcementActionTypeCode>AER</EnforcementActionTypeCode>
          <EnforcementActionName>Phase 3 Test</EnforcementActionName>
          <ProgramsViolatedCode>CWASPILL</ProgramsViolatedCode>
            <EnforcementActionGovernmentContact>
            <ElectronicAddressText>bahtest@bah.com</ElectronicAddressText>
            <AffiliationTypeText>LEA</AffiliationTypeText>
            <StartDateOfContactAssociation>2010-01-01</StartDateOfContactAssociation>
            <EndDateOfContactAssociation>2011-01-01</EndDateOfContactAssociation>
          </EnforcementActionGovernmentContact>
        </InformalEnforcementAction>
      </InformalEnforcementActionData>
</Payload>
</Document>
```

Figure 2.3-3. ICIS-NPDES XML Instance File Linking a Storm Water Event Report to a DMR Form is a sample XML demonstrating embedded linking functionality Linking a Storm Water Event Report to a Discharge Monitoring Report (DMR) Form:

Figure 2.3-3. ICIS-NPDES XML Instance File Linking a Storm Water Event Report to a DMR Form

```
<Payload Operation="DMRProgramReportLinkageSubmission">
  <DMRProgramReportLinkageData>
    <TransactionHeader>
      <TransactionType>R</TransactionType>
    </TransactionHeader>
    <DMRProgramReportLinkage>
      <PermitIdentifier>AZ1005932</PermitIdentifier>
      <PermittedFeatureIdentifier>001</PermittedFeatureIdentifier>
      <LimitSetDesignator>A</LimitSetDesignator>
      <MonitoringPeriodEndDate>2005-12-31</MonitoringPeriodEndDate>
      <LinkageSWEventReport>
        <PermitIdentifier>AL1005932</PermitIdentifier>
        <DateStormEventSampled>2005-12-31</DateStormEventSampled>
      </LinkageSWEventReport>
    </DMRProgramReportLinkage>
```

```
    </DMRProgramReportLinkageData>
</Payload>
```

Figure 2.3-4. ICIS-NDPES XML Instance File Unlinking a Storm Water Event Report to a DMR Form Unlinking a Storm Water Event Report from a DMR Form:

Figure 2.3-4. ICIS-NDPES XML Instance File Unlinking a Storm Water Event Report to a DMR Form

```
<Payload Operation="DMRProgramReportLinkageSubmission">
  <DMRProgramReportLinkageData>
    <TransactionHeader>
      <TransactionType>X</TransactionType>
    </TransactionHeader>
    <DMRProgramReportLinkage>
      <PermitIdentifier>AZ1005932</PermitIdentifier>
      <PermittedFeatureIdentifier>001</PermittedFeatureIdentifier>
      <LimitSetDesignator>A</LimitSetDesignator>
      <MonitoringPeriodEndDate>2005-12-31</MonitoringPeriodEndDate>
      <LinkageSWEventReport>
        <PermitIdentifier>AZ1005932</PermitIdentifier>
        <DateStormEventSampled>2005-12-31</DateStormEventSampled >
      </LinkageSWEventReport >
    </DMRProgramReportLinkage>
  </DMRProgramReportLinkageData>
</Payload>
```

2.3.7 Batch Audit Reports

The ICIS Batch Audit Report is returned to a Batch user following an XML Batch Submission. The report is returned in PDF Format and XML Format and details the accepted transactions, rejected transactions, and a summary of all transactions submitted within a batch. The PDF file is returned with the following name: <Transaction ID>_<Submitting Party>_<Time Stamp>_ Response.pdf, where values contained inside brackets are dynamic values.

The following sub-sections describe the Accepted Transaction PDF Report, Rejected Transaction PDF Report, and Batch Transactions PDF Summary Report that are contained within the Batch Audit Report.

Accepted Transactions PDF Report

The Accepted Transactions Report displays information about transactions that completed processing in ICIS without errors. Since ICIS will finish processing a batch with warning messages, warning messages will be displayed on the Accepted Transactions PDF Report if they exist. The report is sorted in ascending order by the following groups: User ID, Submission Type, and then Key Values.

Figure 2.3-5 is a sample Accepted Transactions PDF Report.

Rejected Transaction PDF Report

The Rejected Transactions PDF Report displays information about transactions that did not complete processing in ICIS because of errors caused by business rule violations and/or transaction processing errors. The report is sorted in ascending order by the following groups: User ID, Submission Type, and then Key Values. Figure 2.3-6 is a sample Rejected Transaction PDF Report.

Batch Transactions Summary PDF Report

The Transactions Summary PDF Report displays information about all transactions that were submitted in the batch. Unlike the Accepted and Rejected PDF Reports, the Summary Report is sorted at the batch level and then sorted in ascending order by Submission Type. The Transactions Summary Report is used to display a snapshot of the entire batch submission. The Transactions Summary Report displays the total number of transactions accepted, total number of transactions rejected, and the percentage of transactions accepted, at both the submission type level and at the batch level. Figure 2.3-7 is a sample Transaction Summary PDF Report.

Figure 2.3-5. Accepted Transaction PDF Report Screen Shot

Environmental Protection Agency
Integrated Compliance Information System
Accepted Transactions Report

Created Date: 05/17/2007
Refresh Date: 06/24/2010
Created By: HQ

Batch Submission Date From: * To: *
Batch ID(s): f802a1c8-38f4-4fa5-95a9-ae0a168e8dee
Submitting Party: HQ

User ID(s): *

Submitting Party: Region HQ

Batch ID	User ID	Run Date	Submission Date
f802a1c8-38f4-4fa5-95a9-ae0a168e8dee	UNGERA	06/24/2010	06/24/2010

Submission Type	Trans Type	Key Value	Warning Message(s)
Basic Permit	New	WYREP0001	Warning: Telephone Extension Number is not a valid tag for Contact Telephone Number Type Code PGE. The Telephone Extension Number 423 was not saved.;
Basic Permit	Change	WYREP0002	
Basic Permit	Replace	WYREP0003	
Permitted Feature	New	WYREP0002002	

Batch ID	User ID	Run Date	Submission Date
f802a1c8-38f4-4fa5-95a9-ae0a168e8dee	WESTB	06/24/2010	06/24/2010

Submission Type	Trans Type	Key Value	Warning Message(s)
Basic Permit	New	WYREP0004	Warning: Telephone Extension Number is not a valid tag for Contact Telephone Number Type Code PGE. The Telephone Extension Number 423 was not saved.;
Basic Permit	Change	WYREP0005	
Basic Permit	Replace	WYREP0006	
Permitted Feature	New	WYREP0005002	

Figure 2.3-6. Rejected Transactions PDF Report Screen Shot

Environmental Protection Agency
Integrated Compliance Information System
Rejected Transactions Report

Created Date: 05/17/2007
Refresh Date: 06/24/2010
Created By: HQ

Batch Submission Date From: * To: *

Batch ID(s): f802a1c8-38f4-4fa5-95a9-ae0a168e8dee

Submitting Party: HQ

User ID(s): *

Submitting Party: Region HQ

Batch ID	User ID	Run Date	Submission Date
f802a1c8-38f4-4fa5-95a9-ae0a168e8dee	UNGERA	06/24/2010	06/24/2010

Submission Type	Trans Type	Key Value	Error / Warning Message(s)
Basic Permit	New	WYREP0007	The Permit Type Code NPJ is invalid for the Basic Permit Data Payload.;
Basic Permit	Change	WYREP0008	A permit does not exist for the key data entered.;
Basic Permit	Replace	WYREP0009	At least one Permittee Address must be entered for the permit.; Affiliation Type Text ZZB does not have an Affiliation_Category of Non-Government, or does not exist or is inactive in the ICIS reference table.;
Permitted Feature	New	WYREP0010001	A Permitted Feature cannot be added because the Permit Identifier does not exist in ICIS.;

Batch ID	User ID	Run Date	Submission Date
f802a1c8-38f4-4fa5-95a9-ae0a168e8dee	WESTB	06/24/2010	06/24/2010

Submission Type	Trans Type	Key Value	Error / Warning Message(s)
Basic Permit	New	WYREP0011	The Permit Type Code NPJ is invalid for the Basic Permit Data Payload.; Warning: Telephone Extension Number is not a valid tag for Contact Telephone Number Type Code PGE. The Telephone Extension Number 423 was not saved.;
Basic Permit	Change	WYREP0012	A permit does not exist for the key data entered.;
Basic Permit	Replace	WYREP0013	At least one Permittee Address must be entered for the permit.; Affiliation Type Text ZZB does not have an Affiliation_Category of Non-Government, or does not exist or is inactive in the ICIS reference table.;
Permitted Feature	New	WYREP0014001	A Permitted Feature cannot be added because the Permit Identifier does not exist in ICIS.;

Figure 2.3-7. Transactions Summary PDF Report Screen Shot

Environmental Protection Agency
Integrated Compliance Information System
Batch Transactions Summary Report

Created Date: 05/17/2007
Refresh Date: 06/24/2010
Created By: HQ

Submission Date From: * To: *
Batch ID(s): f802a1c8-38f4-4fa5-95a9-ae0a168e8dee

Submitting Party: HQ
User ID(s): *

Submitting Party: Region HQ

Batch ID: f802a1c8-38f4-4fa5-95a9-ae0a168e8dee
Submission Date: 06/24/2010

Transaction Type	N	N	R	R	C	C	X	X	D	D	Total Transactions	% Transactions Accepted	Total Submissions
Submission Type	Accepted	Rejected	Accepted	Rejected	Accepted	Rejected	Accepted	Rejected	Accepted	Rejected			
Basic Permit	2	2	2	2	2	2	0	0	0	0	12	50.00 %	12
Permitted Feature	2	2	0	0	0	0	0	0	0	0	4	50.00 %	4
Total	4	4	2	2	2	2	0	0	0	0	16	50.00 %	16

2.3.8   Batch XML Response Files

In addition to returning the combined Batch Audit Reports as one PDF, ICIS will also return three separate Batch Response Files in XML format, or a File Level Error Report (if a file level error exists) in both the XML and the PDF to the submitting party. The three reports are Accepted Transactions XML Report, Rejected Transactions XML Report, and Transactions Summary XML Report. The three reports contain data similar to the combined Batch Audit Report PDF except the reports are in XML format that can be used by a state system. The Transactions Summary XML Report differs from the Transaction Summary PDF Report in that the XML report is sorted by the ICIS User ID. CDX also places the results of schema validation in a file entitled Submission-Metadata XML.

The following sub-sections describe the Accepted Transactions XML Report, Rejected Transactions XML Report, Transactions Summary XML Report, File Level Error XML and PDF Report, Submission Metadata XML and Schema validation PDF that are sent to Full Batch users.

Accepted Transactions XML Report

The Accepted Transactions XML Report provides information about transactions that completed processing without errors. Since ICIS will finish processing a batch with warning messages, warning messages will be displayed on the Accepted Transactions XML Report if they exist. The XML file is named: <Transaction ID>_<Submitting Party>_<Time Stamp>_Accepted_Response.xml, where values contained inside brackets are dynamic values. The report is sorted in ascending order by the following groups: User ID, Submission Type, and then Key Values. Figure 2.3-8 is a sample Accepted Transactions XML Report.

Figure 2.3-8. Accepted Transactions XML Report Screen Shot

```
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2005 rel. 3 U (http://www.altova.com)-->
<SubmissionResponse xmlns="http://www.exchangenetwork.net/schema/icis/1" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="http://www.exchangenetwork.net/schema/icis/1 http://www.exchangenetwork.net/schema/icis/1/ICIS_RF_SubmissionResponse_v1.5m.xsd">
        <TransactionIdentifier>asdf-1234-sefa-1234</TransactionIdentifier>
        <SubmissionDate>2010-08-13</SubmissionDate>
        <ProcessedDate>2010-08-13</ProcessedDate>
        <SubmittingParty>
            <UserID>ABC</UserID>
            <SubmissionType>
                <SubmissionTypeName>Basic Permit</SubmissionTypeName>
                <SubmissionsAccepted>
                    <SubmissionAccepted>
                        <SubmissionAcceptedKey>
                            <PermitRecordIdentifier>
                                <PermitIdentifier>AA0789012</PermitIdentifier>
                            </PermitRecordIdentifier>
                            <SubmissionTransactionTypeCode>R</SubmissionTransactionTypeCode>
                        </SubmissionAcceptedKey>
                    </SubmissionAccepted>
                </SubmissionsAccepted>
            </SubmissionType>
            <SubmissionType>
                <SubmissionTypeName>Discharge Monitoring Report</SubmissionTypeName>
                <SubmissionsAccepted>
                    <SubmissionAccepted>
                        <SubmissionAcceptedKey>
                            <DMRParameterIdentifier>
                                <PermitIdentifier>AA0123456</PermitIdentifier>
                                <PermittedFeatureIdentifier>001</PermittedFeatureIdentifier>
                                <LimitSetDesignator>A</LimitSetDesignator>
                                <MonitoringPeriodEndDate>2010-07-31</MonitoringPeriodEndDate>
                                <ParameterCode>00400</ParameterCode>
                                <MonitoringSiteDescriptionCode>A</MonitoringSiteDescriptionCode>
                                <LimitSeasonNumber>1</LimitSeasonNumber>
                            </DMRParameterIdentifier>
                            <SubmissionTransactionTypeCode>R</SubmissionTransactionTypeCode>
                        </SubmissionAcceptedKey>
                        <AcceptedReport>
                            <InformationCode>DMR300</InformationCode>
                            <InformationTypeCode>Warning</InformationTypeCode>
                            <InformationDescription>Warning: The following Numeric Condition Quantity(ies) has a Percent Exceedence
greater than 500%: column.this error message, value and column will be listed for each column that has this error.</InformationDescription>
                        </AcceptedReport>
                    </SubmissionAccepted>
                </SubmissionsAccepted>
            </SubmissionType>
        </SubmittingParty>
</SubmissionResponse>
```

If no accepted transactions exist, ICIS will return an Accepted Transactions XML Report with only the following tags: <SubmissionResponse>, <TransactionIdentifier>, <SubmissionDate>, and <ProcessedDate>. Figure 2.3-9 is a sample Accepted Transactions XML Report where no accepted transactions exist.

Figure 2.3-9. Accepted Transactions XML Report Screen Shot with No Accepted Transactions

```
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2005 rel. 3 U (http://www.altova.com)-->
<SubmissionResponse xmlns="http://www.exchangenetwork.net/schema/icis/1" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="http://www.exchangenetwork.net/schema/icis/1 http://www.exchangenetwork.net/schema/icis/1/ICIS_RF_SubmissionResponse_v1.5m.xsd">
        <TransactionIdentifier>asdf-1234-sefa-1234</TransactionIdentifier>
        <SubmissionDate>2010-08-13</SubmissionDate>
        <ProcessedDate>2010-08-13</ProcessedDate>
</SubmissionResponse>
```

Rejected Transaction PDF Report

The Rejected Transactions XML Report provides information about transactions that did not complete processing because of errors caused by business rule violations. The XML file is named: <Transaction ID>_<Submitting Party>_<Time Stamp>_Rejected_Response.xml, where values contained inside brackets are dynamic values. The report is sorted in the following order: User ID, Submission Type, and then Key Values.

Figure 2.3-10 is a sample Rejected Transactions XML Report.

If no rejected transactions exist, ICIS will return a Rejected Transactions XML Report with only the following tags: <SubmissionResponse>, <TransactionIdentifier>, <SubmissionDate>, and <ProcessedDate>. Figure 2.3-11. Rejected Transactions XML Report Screen Shot with No Rejected Transactions is a sample Rejected Transactions XML Report where no rejected transactions exist.

Batch Transactions Summary XML Report

The Transactions Summary XML Report provides totals of transactions that were submitted in the batch by ICIS User ID. The report is sorted in the following order: User ID and then Submission Type. The Transactions Summary Report provides the total number of transactions accepted, total number of transactions rejected, and the percentage of transactions accepted at the submission level. The XML file is named: <Transaction ID>_<Submitting Party>_<Time Stamp>_Summary Response.xml, where values contained inside brackets are dynamic values. At the batch level, the Transaction Summary Report provides the total number of submissions and the total percentage of transactions accepted for the entire batch. Figure 2.3-12 is a sample Transaction Summary XML Report.

File Level Error Report

The File Level Error Report provides information about transactions that did not complete processing because of errors that occurred at the file level (e.g., invalid User ID). The report will list the invalid User IDs in the order the files are processed and is available in both XML and PDF format. The XML file is named: <Transaction ID>_<Submission Date>_File_Error_Response.xml, where values contained inside brackets are dynamic values. Figure 2.3-13. File Level Error XML Report Screen Shot is a sample File Level Error XML Report. Figure 2.3-14 is a sample File Level Error PDF Report.

Submission Metadata XML File

The Submission Metadata XML file provides users with the results of CDX schema validation. Figure 2.3-15 shows an example of a file that has successfully passed CDX schema validation. Figure 2.3-16 provides an example of a file that has failed CDX schema validation and the corresponding error messages.

Figure 2.3-10. Rejected Transactions XML Report Screen Shot

```
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2005 rel. 3 U (http://www.altova.com)-->
<SubmissionResponse xmlns="http://www.exchangenetwork.net/schema/icis/1" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="http://www.exchangenetwork.net/schema/icis/1
http://www.exchangenetwork.net/schema/icis/1/ICIS_RF_SubmissionResponse_v1.5m.xsd">
        <TransactionIdentifier>asdf-1234-sefa-1234</TransactionIdentifier>
        <SubmissionDate>2010-08-13</SubmissionDate>
        <ProcessedDate>2010-08-13</ProcessedDate>
        <SubmittingParty>
                <UserID>ABC</UserID>
                <SubmissionType>
                        <SubmissionTypeName>Basic Permit</SubmissionTypeName>
                        <SubmissionErrors>
                                <SubmissionError>
                                        <SubmissionErrorKey>
                                                <PermitRecordIdentifier>
                                                        <PermitIdentifier>AA0789012</PermitIdentifier>
                                                </PermitRecordIdentifier>
                                                <SubmissionTransactionTypeCode>R</SubmissionTransactionTypeCode>
                                        </SubmissionErrorKey>
                                        <ErrorReport>
                                                <ErrorCode>BP170</ErrorCode>
                                                <ErrorTypeCode>Error</ErrorTypeCode>
                                                <ErrorDescription>Receiving Permit Identifier must be entered because Permit Type Code is IIU.</ErrorDescription>
                                        </ErrorReport>
                                </SubmissionError>
                        </SubmissionErrors>
                </SubmissionType>
                <SubmissionType>
                        <SubmissionTypeName>Basic Permit</SubmissionTypeName>
                        <SubmissionErrors>
                                <SubmissionError>
                                        <SubmissionErrorKey>
                                                <DischargeMonitoringReportIdentifier>
                                                        <PermitIdentifier>AA0123456</PermitIdentifier>
                                                        <PermittedFeatureIdentifier>001</PermittedFeatureIdentifier>
                                                        <LimitSetDesignator>A</LimitSetDesignator>
                                                        <MonitoringPeriodEndDate>2010-07-31</MonitoringPeriodEndDate>
                                                </DischargeMonitoringReportIdentifier>
                                                <SubmissionTransactionTypeCode>C</SubmissionTransactionTypeCode>
                                        </SubmissionErrorKey>
                                        <ErrorReport>
                                                <ErrorCode>DMR050</ErrorCode>
                                                <ErrorTypeCode>Error</ErrorTypeCode>
                                                <ErrorDescription>Form NODI cannot be entered because at least one DMR Value exists for the DMR Form.</ErrorDescription>
                                        </ErrorReport>
                                </SubmissionError>
                        </SubmissionErrors>
                </SubmissionType>
        </SubmittingParty>
</SubmissionResponse>
```

Figure 2.3-11. Rejected Transactions XML Report Screen Shot with No Rejected Transactions

```
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2005 rel. 3 U (http://www.altova.com)-->
<SubmissionResponse xmlns="http://www.exchangenetwork.net/schema/icis/1" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="http://www.exchangenetwork.net/schema/icis/1 http://www.exchangenetwork.net/schema/icis/1/ICIS_RF_SubmissionResponse_v1.5m.xsd">
        <TransactionIdentifier>asdf-1234-sefa-1234</TransactionIdentifier>
        <SubmissionDate>2010-08-13</SubmissionDate>
        <ProcessedDate>2010-08-13</ProcessedDate>
</SubmissionResponse>
```

Figure 2.3-12. Transactions Summary XML Report Screen Shot

```xml
<?xml version="1.0" encoding="UTF-8"?>
<!--Sample XML file generated by XMLSpy v2005 rel. 3 U (http://www.altova.com)-->
<SubmissionResponse xmlns="http://www.exchangenetwork.net/schema/icis/1" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="http://www.exchangenetwork.net/schema/icis/1 http://www.exchangenetwork.net/schema/icis/1/ICIS_RF_SubmissionResponse_v1.5m.xsd">
    <TransactionIdentifier>asdf-1234-sefa-1234</TransactionIdentifier>
    <SubmissionDate>2010-08-13</SubmissionDate>
    <ProcessedDate>2010-08-13</ProcessedDate>
    <SubmittingParty>
        <UserID>ABC</UserID>
        <SubmissionType>
            <SubmissionTypeName>Basic Permit</SubmissionTypeName>
            <SubmissionSummary>
                <TransactionTypeTotals>
                    <SubmissionTransactionTypeCode>N</SubmissionTransactionTypeCode>
                    <TotalAcceptedTransactions>1</TotalAcceptedTransactions>
                    <TotalRejectedTransactions>1</TotalRejectedTransactions>
                </TransactionTypeTotals>
                <TransactionTypeTotals>
                    <SubmissionTransactionTypeCode>C</SubmissionTransactionTypeCode>
                    <TotalAcceptedTransactions>2</TotalAcceptedTransactions>
                    <TotalRejectedTransactions>2</TotalRejectedTransactions>
                </TransactionTypeTotals>
                <TotalTransactions>6</TotalTransactions>
                <PercentTransactionsAccepted>50.00</PercentTransactionsAccepted>
                <TotalSubmissions>6</TotalSubmissions>
            </SubmissionSummary>
        </SubmissionType>
        <SubmissionType>
            <SubmissionTypeName>Master General Permit</SubmissionTypeName>
            <SubmissionSummary>
                <TransactionTypeTotals>
                    <SubmissionTransactionTypeCode>N</SubmissionTransactionTypeCode>
                    <TotalAcceptedTransactions>1</TotalAcceptedTransactions>
                    <TotalRejectedTransactions>1</TotalRejectedTransactions>
                </TransactionTypeTotals>
                <TransactionTypeTotals>
                    <SubmissionTransactionTypeCode>C</SubmissionTransactionTypeCode>
                    <TotalAcceptedTransactions>2</TotalAcceptedTransactions>
                    <TotalRejectedTransactions>2</TotalRejectedTransactions>
                </TransactionTypeTotals>
                <TotalTransactions>6</TotalTransactions>
                <PercentTransactionsAccepted>50.00</PercentTransactionsAccepted>
                <TotalSubmissions>6</TotalSubmissions>
            </SubmissionSummary>
        </SubmissionType>
        <BatchTotalTransactions>12</BatchTotalTransactions>
        <BatchTotalSubmissions>12</BatchTotalSubmissions>
        <BatchTotalPercentTransactionsAccepted>50.00</BatchTotalPercentTransactionsAccepted>
    </SubmittingParty>
</SubmissionResponse>
```

Figure 2.3-13. File Level Error XML Report Screen Shot

```xml
<?xml version="1.0"?>
<SubmissionResponse xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns="http://www.exchangenetwork.net/schema/icis/1">
    <TransactionIdentifier>_3e134e25-5e7a-4d7d-abd9-6d2626ba279f</TransactionIdentifier>
    <SubmissionDate>2010-10-19</SubmissionDate>
    <ProcessedDate>2010-10-19</ProcessedDate>
    <FileSubmissionErrors>
        <FileSubmissionError>
            <FileErrorReport>
                <ErrorTypeCode>Error</ErrorTypeCode>
                <ErrorDescription>Unable to parse file Unpermitted_Facility.xml because 'xxx' is an invalid ICIS user</ErrorDescription>
            </FileErrorReport>
            <FileErrorReport>
                <ErrorTypeCode>Error</ErrorTypeCode>
                <ErrorDescription>Batch parsing failed</ErrorDescription>
            </FileErrorReport>
        </FileSubmissionError>
    </FileSubmissionErrors>
</SubmissionResponse>
```

Figure 2.3-14. File Level Error PDF Report Screen Shot

Batch _a13394d5-8da4-4c52-b35a-053244ea9ede has processed in ICIS.

Some files could not be processed due to the following errors:

- Batch parsing failed
- Unable to parse file EPAST_00A1.xml because 'HQS4' is an invalid ICIS user

Figure 2.3-15. Submission Metadata Pass XML Report Screen Shot

```xml
<?xml version="1.0" encoding="UTF-8"?>

<submission>
  <file>
    <name>EPAST_00A1.xml</name>
    <email>miller_stephanie@bah.com</email>
    <status>VALID</status>
    <result>Congratulations! The document,d:\SOAPServer\DataFolder\_0e513791-bbea-4573-ba6b-c13900a14c700.unzipped\EPAST_00A1.xml, is valid according to the schema.</result>
  </file>
</submission>
```

Figure 2.3-16. Submission Metadata Fail XML Report Screen Shot

```xml
<submission>
  <file>
    <name>EPAST_00A1.xml</name>
    <email>miller_stephanie@bah.com</email>
    <status>INVALID</status>
    <result>The document,d:\SOAPServer\DataFolder\_5fd76c2a-4557-4728-a462-dda6007e68a10.unzipped\EPAST_00A1.xml, contains the following error(s):
    Error at line 49 column 32 : The 'http://www.exchangenetwork.net/schema/icis/2:PermitIdentifier' element is invalid -
    The value 'ZZZZZZZ' is invalid according to its datatype 'http://www.exchangenetwork.net/schema/icis/2:String9FixedTypeBase' -
    The actual length is less than the MinLength value.</result>
  </file>
</submission>
```

3.0   FUNCTIONAL, DATA, AND BUSINESS REQUIREMENTS

3.1   FACILITY OVERVIEW

Facilities are the heart of ICIS-Air, which tracks the applicable regulations and compliance monitoring and enforcement activities surrounding them. A facility itself has several significant sub-areas, including Compliance Monitoring Strategy (CMS), Permit, and Wood Stoves data.

3.1.1   Facility

A Facility is defined in AFS as a distinct real property entity operating at a physical location. AFS also maintains information for Portable sources, defined as a process that may or may not be permitted but can be moved from place to place, such as an Asphalt Processing Plant that is movable from site to site and can emit pollutants above a threshold level of concern. AFS maintains Facility Level records, which include Geographical information, as well as Air Program and Pollutant information pertaining to the specific Facility. Agency and Federal users all have the ability to add a Facility into AFS.

Facilities will have several sub-families of data:

- General facility description information, including geographic information
- Air Programs with operating statuses, of which the most "active" will roll-up to the Facility Operating Status
  - Individual Air Programs will have the ability to have sub parts that are Active or Inactive
- Pollutants with Classifications and Compliance Statuses[3] that roll up to the Facility Classification Status

It is important to note that there will be no relationship between Air Programs and Pollutants, and the capability to link the two will not exist in the modernized system. ICIS-Air will include historical records for both Air Program Operating Status and Pollutant Classification. EPA and Delegated Agency Pollutant Classification will be reported and stored independently.

3.1.1.1   *Summary of Facility Modernization in ICIS-Air*

Some Facility functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Terminology Change: Plant to Facility**
  Legacy AFS uses the term "Plant" to describe Facilities. In keeping with EPA data standards, ICIS-Air will use the term Facility.

- **Owner History**
   The modernized system will track owners over time as a repeating attribute of the Facility.

- **Removal of Obsolete Air Programs**
  The following operating statuses, (currently obsolete in AFS) will not be included in the modernized system: Landfill, NESHAP Renovation, NESHAP Demolition, NESHAP Spraying.

---

[3] At time of draft, whether compliance status will continue to exist for a pollutant and/facility is under discussion.

- **Air Programs and Operating Status History**

  In legacy AFS, no historical records of Air Program Operating Status were kept. ICIS-Air will provide a historical record of the Operating Status of an Air Program, defined by start and shutdown dates. This historical Air Program record will be used to define a history of the Facility Operating Status.

- **Air Program Subparts and Operating Status History**

  Legacy AFS did not require the reporting of Air Program Subpart Operating Status. The modernized system will provide a historical record of the Operating Status of an Air Program Subpart, defined by start and shutdown dates. A system function will be added to automatically turn off child Air Program sub parts if the parent Air Program has an operating status of Permanently Closed. The parent Air Program will not be affected by closure of child Air Program Subparts. Additionally, the system will provide the ability to reopen a shutdown air program or air program subpart, should a facility renew a previously shut down program. The system will provide a history of air program and subpart records to allow restart of any air program or subpart.

- **Pollutant Classification History and Rollups**

  Legacy AFS rolled up the most stringent Pollutant Classification value to the Facility Record level. In the modernized system, the strictest Pollutant Classification will continue to be displayed at the Facility Record level. There will be two classification values rolled up to the Facility Record level, EPA and State. A history of changes in Classification value will be kept at both the Facility and Pollutant level. The date of change for pollutant classification history will default to the day of data entry for the Pollutant classification change, and users may choose to overwrite the default and enter an actual date of status change. State and EPA changes to Pollutant Classification values will be reported and rolled up separately. The system shall provide a default classification value for use in reports. The Pollutant Classification History and Rollups are illustrated in the tables below. Table 3.1-1 illustrates the Pollutant Classification Hierarchy for use in generating default classification at the Facility Record Level Table 3.1-2 illustrates changes in the Pollutant Tracking History. Table 3.1-3 provides an explanation of the logic behind status roll up displayed in Table 3.1-2.

Table 3.1-1. Pollutant Classification Hierarchy

Pollutant Classification	Logic for Default Classification
Major	Pollutant Classification will supersede the following Classification(s): Synthetic Minor Minor Unknown
Synthetic Minor	Pollutant Classification will supersede the following Classification(s): Minor Unknown
Minor	Pollutant Classification will supersede the following Classification(s): Unknown
Unknown	Pollutant Classification will not supersede any other Classification(s)

Table 3.1-2. Pollutant Status Roll Up

Row	Pollutant	Start Date	End Date	Delegated Agency Pollutant Classification	EPA Pollutant Classification
1	Pollutant 3	11/1/2009	12/31/2009	Unknown	Unknown
2	Pollutant 3	1/1/2010		Minor	Minor
3	Pollutant 2	1/1/2010	12/31/2010	Unknown	SM
4	Pollutant 2	1/1/2011		Major	Major
5	Pollutant 1	1/30/2011		Major	
6	Pollutant 1	6/1/2010	1/29/2011	SM	
7	Pollutant 1	6/1/2010			Major

Table 3.1-3. Status Roll Up Logic for Change

Start Date	End Date	Facility Default Classification	Delegated Agency Status	EPA Status	Logic for change
11/1/2009	12/31/2009	Unknown	Unknown	Unknown	Pollutant 3 (Row 1) is the only pollutant, and at an "Unknown" level for both the Delegated Agency and EPA. Default Pollutant Classification is Unknown.
1/1/2010	5/31/2010	SM	SM	SM	Pollutant 2 (Row 3) is added as a pollutant, and its EPA classification is higher than Pollutant 3 (Row 2). Pollutant 3 has been reclassified, and the Delegated Agency classification for Pollutant 3 (Row 3) is higher than Pollutant 2. Facility Default Classification is SM, following the Classification Hierarchy.
6/1/2010	12/31/2010	Major	SM	Major	Pollutant 1 is added as a pollutant, the EPA (Row 5) classification is higher than previous designations, although the Delegated Agency classification is equal to the current highest classification. Facility Default Classification is changed to Major, following the Classification Hierarchy.
1/1/2011		Major	Major	Major	Pollutant 2 (Row 4) Delegated Agency classification changes, and is higher than previous Delegated Agency Classification. EPA remains unchanged since new Pollutant 2 (Row 4) classification is equal to current EPA classification from Pollutant 1 (Row 7). Facility Default Classification remains as Major.

- **Compliance Status**

  ICIS-Air will no longer have a Compliance Status of "In Compliance". Separate Indicators will track CMS Status and whether the Facility has active HPV.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Facilities in ICIS-Air.

3.1.1.2   *Facility Functional Requirements*

Table 3.1-4 lists the requirements that apply to Facilities. It includes functions that are allowed and business rules within a function.

Table 3.1-4. ICIS-Air Facility Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.1, 5.5.2, 5.4.6	EPA SRS	The system shall allow the user to add a new Facility record.	ICIS-Air version 1.0
2.	5.4.6	EPA SRS	The system shall allow the user to edit an existing Facility record.	ICIS-Air version 1.0
3.	5.4.6	EPA SRS	The system shall allow the user to delete an existing Facility record.	ICIS-Air version 1.0
4.	5.1.1, 5.1.2, 5.1.4, 5.1.5, 5.1.6	EPA SRS	The system shall allow the user to search for a Facility by populating any one of the following fields or combination of fields: • Facility Site Name/Corporate Entity Name • Facility ID • FRS ID • Region • Registration Number • LCON • Air Programs • Pollutants • Government Ownership • Federal Facility Ownership • Address • City • County • State • Zip Code • Tribal Ownership • Tribal Land • North American Industry Classification System (NAICS) Codes • Standard Industry Classification (SIC) Codes • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6	ICIS-Air version 1.0
5.	5.1.3	EPA SRS	The system shall allow the user to sort the facilities presented in a search results list.	ICIS-Air version 1.0
6.	5.1.3	EPA SRS	The system shall provide up to 500 responses in a facility search.	ICIS-Air version 1.0
7.	5.1.3	EPA SRS	The system shall display a message to the user to refine search criteria if the facility search yields more than 500 responses.	ICIS-Air version 1.0
8.	N/A		The system shall enforce the security model for the users to view, add, edit, and delete a Facility. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
9.	5.6.1, 5.15.2	EPA SRS	The system shall display the following data elements on the Facility screen: • Federal Registry System ID • Facility ID • Facility Site Name • Corporate Entity Name • Previous Facility Name(s) • Address • City • State	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Zip Code • FIP County Name • Local Control Region • Registration Number • Facility Description • Small Business Flag • Electronic Data Flag • Federally Reportable Flag • Tribal Land • Primary NAICS • Secondary NAICS • Primary SIC • Secondary SIC • Latitude Decimal Degrees • Latitude Degrees, Minutes, Seconds • Longitude Decimal Degrees • Longitude Degrees, Minutes, Seconds • Horizontal Accuracy Measure • Geometric Type Code • Geometric Type Name • Horizontal Collection Method Code • Horizontal Collection Method Text • Horizontal Reference Datum Code • Horizontal Reference Datum Name • Reference Point Code • Reference Point Text • Source Map Scale Number • UTM Coordinate 1 • UTM Coordinate 2 • UTM Coordinate 3 • Facility Contact and Address Information (e.g., owners and operators) • National Initiatives • Portable Source Flag • Portable Source Site Name • Portable Source Start Date • Portable Source End Date • Attainment Status • Criteria Pollutant • Nonattainment Area • Date Extracted from EPA Greenbook • Comments • Comment Entered On • Comment Entered By • Sensitive Comment Flag • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6 • Created Date • Created By • Updated Date • Updated By	
10.	5.2.1, 5.4.4	EPA SRS	The system shall require the user to enter data into the following fields to add a new Facility: • Facility ID • Facility Name	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Facility Location Address • Facility City • Facility State • Facility County • Facility Zip Code • Facility Primary NAICS Code • Air Program Code • Air Program Operating Status • Air Program Operating Status Date (Defaults to current date) • Pollutant Code • Pollutant Classification • Pollutant Classification Date (Defaults to current date)	
11.	5.2.1	EPA SRS	The system shall require that at least one Air Program and one Pollutant be entered in order for a Facility to be added in AFS.	ICIS-Air version 1.0
12.	N/A		The system shall allow the user to add an Air Program on a Facility record.	ICIS-Air version 1.0
13.	N/A		The system shall allow the user to edit an Air Program on a Facility record.	ICIS-Air version 1.0
14.	N/A		The system shall allow the user to delete an Air Program on a Facility record.	ICIS-Air version 1.0
15.	N/A		The system shall not allow the user to delete an Air Program on a Facility record if only one Air Program exists for that Facility record.	ICIS-Air version 1.0
16.	5.6.2	EPA SRS	The system shall display the following data elements on the Air Programs screen for Air Programs and Air Program Subparts: • Applicable Air Programs • Air Program Operating Status • Air Program Start Date • Air Program Shutdown Date • Air Program Subparts • Air Program Subpart Start Date • Air Program Subpart Operating Status • Air Program Subpart Shutdown Date • Program Comments • Sub Part Comments	ICIS-Air version 1.0
17.	5.6.2	EPA SRS	The system shall require the user to enter data into the following fields to add an Air Program record: • Applicable Air Program • Air Program Operating Status • Air Program Operating Status Date (default)	ICIS-Air version 1.0
18.	N/A		The system shall default the Air Program Operating Status Start Date to the day of data entry for the Air Program Operating Status change.	ICIS-Air version 1.0
19.	N/A		The system shall allow users to overwrite the default data entry date and enter the actual date of the status change of an Air Program Operating Status.	ICIS-Air version 1.0
20.	N/A		The system shall require the user to enter data into the following fields to add an Air Program subpart record: • Air Program Subpart • Air Program Subpart Operating Status • Air Program Subpart Operating Status Date (default)	ICIS-Air version 1.0
21.	N/A		The system shall default the Air Program Subpart	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			Operating Status Start Date to the day of data entry for the Air Program Subpart Operating Status change.	
22.	N/A		The system shall allow users to overwrite the default data entry date and enter the actual date of the status change of an Air Program Subpart Operating Status.	ICIS-Air version 1.0
23.	N/A	BRC pg. 30	The system shall allow multiple subparts to be added to an Air Program.	ICIS-Air version 1.0
25.	N/A		The system shall track the history of changes in Air Program Operating Status at the Facility level.	ICIS-Air version 1.0
26.	N/A		The system shall allow the user to add a Pollutant to a Facility Record.	ICIS-Air version 1.0
27.	N/A		The system shall allow the user to edit a Pollutant on a Facility Record.	ICIS-Air version 1.0
28.	N/A		The system shall allow the user to delete a Pollutant from a Facility record.	ICIS-Air version 1.0
29.	N/A		The system shall not allow the user to delete a Pollutant on a Facility record if only one Pollutant exists for that Facility record.	ICIS-Air version 1.0
30.	5.6.3	EPA SRS	The system shall display the following data elements on the Pollutants screen for Pollutants: • Pollutant Name • Pollutant Code • Pollutant Classification by EPA • Pollutant Classification by Delegated Agency • Classification Start Date • Classification End Date • Comments	ICIS-Air version 1.0
31.	5.6.3	EPA SRS	The system shall require the user to enter data into of the following fields to add a new Pollutant record: • Pollutant Code or Chemical Abstract Service Number • EPA or Delegated Agency Classification	ICIS-Air version 1.0
32.	N/A		The system shall track the history of changes in Pollutant Classification at both the Facility and Pollutant Record level.	ICIS-Air version 1.0
33.	N/A		The system shall default the Classification Start Date to the day of data entry for the Pollutant classification change.	ICIS-Air version 1.0
34.	N/A		The system shall allow EPA to document a separate Pollutant Classification value from the Delegated Agency Pollutant Classification.	ICIS-Air version 1.0
35.	N/A		The system shall allow users to overwrite the default data entry date and enter the actual date of the status change of a Pollutant Classification.	ICIS-Air version 1.0
36.	N/A		The system shall track the ownership history of the Facility.	ICIS-Air version 1.0
37.	5.6.4	EPA SRS	The system shall provide summary information for each Facility. The summary information shall include: • Current Default Classification • Current Default Classification Start Date (defaulted) • Current Classification by EPA • Current Classification by Delegated Agency • Current Operating Status • Current Operating Status Start Date (defaulted) • CMS Status	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Electronic Data Flag • Attainment/Nonattainment Information	
38.	5.1.7, 5.4.8	EPA SRS	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Facility data.	ICIS-Air version 1.0
39.	5.1.7, 5.4.8	EPA SRS	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all new Facility data.	ICIS-Air version 1.0
40.	5.2.4	Tier 3 3/08/2012	The system shall display a warning message if the Facility Classification does not match the CMS Category.	ICIS-Air version 1.0
41.	5.2.4	Tier 3 3/08/2012	The system shall display a warning message if the Facility has an active CMS record and the user sets the Facility to Permanently Closed.	ICIS-Air version 1.0
42.	N/A		The system shall display EPA data for state/local users as read-only.	ICIS-Air version 1.0
43.	5.2.4	EPA SRS	The system shall display a message notifying the user if the Facility is set to Permanently Closed and it has an active CMS Plan record and allowing the user to set the CMS Plan record to the inactive and enter the date it was removed from the Agency's CMS Plan.	ICIS-Air version 1.0

3.1.1.3 Facility Data Requirements

Table 3.1-5 lists the data element requirements that apply to Facilities. This table includes the system, minimum data requirements, and possible future data elements.

Table 3.1-5. ICIS-Air Facility Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
1.	N	N	N	Y	5.6.1	FRS Identifier • Alphanumeric (30) • System Generated
2.	Y	Y	Y	N	5.6.1	Facility ID • Alphanumeric (15)
3.	N	Y	Y	N	5.6.1	State • Must be validated against Ref Table. • Value from PO Abbreviation • OR Value from Federal Information Processing Standard (FIPS) table
4.	N	Y	Y	N	5.6.1	County – FIPS • Must be validated against Ref Table. • Value from FIPS table
5.	N	Y	Y	N	5.6.1	Facility Location Address • Alphanumeric (60) • Free-form text
6.	N	N	N	N		Supplemental Location Address • Alphanumeric (50) • Free-form text
7.	N	Y	Y	N	5.6.1	City • Alphanumeric (60) • Free-form text
8.	N	Y	Y	N	5.6.1	Zip Code • Numeric (14)
9.	Y	Y	Y	N	5.6.1	Facility Name • Alphanumeric (60) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Requirement
10.	N	N	N	Y	5.6.1	Previous Facility Name • Alphanumeric (60) • Free-form text • 0 to Many

11.	N	N	N	Y	5.6.1	Date Name Changed
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

12.	N	N	N	N	5.6.1	Facility Description • Alphanumeric (50) • Free-form text

13.	N	N	N	N	5.6.1	Small Business Flag
						• Alphanumeric (1)
						• Valid Values:
						  – Yes
						  – No

14.	N	N	C	Y	5.6.1	Local Control Agency • Must be validated against Ref Table. • Programmatically required if Facility is under LCON jurisdiction • System Generated based on user profile
15.	N	N	N	Y		LCON Description • System generated based on LCON selection
16.	N	N	C	N	5.6.1	Tribal Land • Must be validated against Ref Table • Programmatically required if Facility is under Tribal jurisdiction
17.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Corporate Entity Name • Alphanumeric (50) • Free-form Text • Multiple for a Facility record

18.	N	N	N	Y	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Corporate Entity Association Start Date
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

19.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Corporate Entity Association End Date
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

20.	N	N	N	N	5.6.1	Latitude Decimal Degrees • Alphanumeric (10) • Must be entered when Facility Longitude is entered • Decimal Degrees: • Alphanumeric with six decimal positions • First character is + or -

ID	Key?	SR	PR	SG	Client Req ID	Requirement
21.	N	N	N	N	5.6.1	Latitude Degrees, Minutes, Seconds • Must be entered as HDDMMSST, where H = + or -, DD = degrees, MM = minutes, SS = seconds, T = tenths of a second • The numeric value is edited for valid hemisphere, degrees, minutes (cannot exceed 59), seconds (cannot exceed 59), and tenths of a second
22.	N	N	N	N	5.6.1	Longitude Decimal Degrees • Alphanumeric (11) • Must be entered when Facility Longitude is entered • Decimal Degrees: • Alphanumeric with six decimal positions • First character is + or -
23.	N	N	N	N	5.6.1	Longitude Degrees, Minutes, Seconds • Must be entered as HDDMMSST, where H = + or -, DD = degrees, MM = minutes, SS = seconds, T = tenths of a second • The numeric value is edited for valid hemisphere, degrees, minutes (cannot exceed 59), seconds (cannot exceed 59), and tenths of a second
24.	N	N	N	N		Facility Horizontal Accuracy Measure • Alphanumeric (6) • Floating decimal • Displayed as a +/- range • Cannot be entered unless Facility Latitude and Longitude are entered
25.	N	N	N	N		Facility Geometric Type Code • Alphanumeric (3)
26.	N	N	N	N		Facility Geometric Type Name • Alphanumeric (7)
27.	N	N	N	N		Facility Horizontal Collection Method Code • Alphanumeric (3) • Validate against Collection Method Ref Table (data standards) • Cannot be entered unless Facility Latitude and Longitude are entered
28.	N	N	N	N		Facility Horizontal Collection Method Text • Alphanumeric (60) • Cannot be entered unless Facility Latitude and Longitude are entered
29.	N	N	N	N		Facility Horizontal Reference Datum Code • Alphanumeric (3) • Validate against Datum Ref Table (data standards) • Cannot be entered unless Facility Latitude and Longitude are entered
30.	N	N	N	N		Facility Horizontal Reference Datum Name • Alphanumeric (7) • Validate against Datum Name Ref Table (data standards) • Cannot be entered unless Facility Latitude and Longitude are entered
31.	N	N	N	N		Facility Reference Point Code • Alphanumeric (3) • Validate against Reference Point Ref Table (data standards) • Cannot be entered unless Facility Latitude and Longitude are entered

ID	Key?	SR	PR	SG	Client Req ID	Requirement
32.	N	N	N	N		Facility Reference Point Text • Alphanumeric (60) • Cannot be entered unless Facility Latitude and Longitude are entered
33.	N	N	N	N		Facility Source Map Scale Number • Alphanumeric (10)
34.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Universal Transverse Mercator Coordinate 1 • TBD
35.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Universal Transverse Mercator Coordinate 2 • TBD
36.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Universal Transverse Mercator Coordinate 3 • TBD
37.	N	N	N	N	5.6.1	National Initiatives • Must be validated against Ref Table. • 0 to Many may be entered
38.	N	Y	N	Y	5.6.1	Historic National Initiatives • System generated yearly by valid National Initiatives
39.	N	N	N	N	5.6.1	Source Uniform Resource Locator (URL) • Alphanumeric (100) • Free-form text
40.	N	N	N	N	5.6.1	Facility Mailing Street Address[4] • Alphanumeric (50) • Free-form text
41.	N	N	N	N	5.6.1	Facility Mailing City • Alphanumeric (60) • Free-form text
42.	N	N	N	N	5.6.1	Facility Mailing State • Must be validated against Ref Table. • Value from PO Abbreviation • OR Value from FIPS table
43.	N	N	N	N	5.6.1	Facility Mailing Zip Code • Numeric (14)
44.	N	N	N	N	5.6.1	Contact User ID • Must be validated against Ref Table
45.	N	Y	Y	N	5.6.1	Primary NAICS • Must be validated against Ref Table. • Alphanumeric (6)

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[4] Owner Information can be entered in Contacts and Addresses

ID	Key?	SR	PR	SG	Client Req ID	Requirement
46.	N	N	N	N	5.6.1	Secondary NAICS • Must be validated against Ref Table. • Alphanumeric (6) • 0 to Many Codes may be entered
47.	N	N	N	N	5.6.1	Primary SIC • Must be validated against Ref Table. • Alphanumeric (4)
48.	N	N	N	N	5.6.1	Secondary SIC • Must be validated against Ref Table. • Alphanumeric (4) • 0 to Many Codes may be entered
49.	N	N	C	Y	5.6.1	Portable Source Flag: • Programmatically Required if Facility is a Portable Source • Valid Values: – N (default) – Y
50.	N	N	N	N	5.6.1	Portable Source Site Name • Alphanumeric (40) • Free-form text
51.	N	N	N	N	5.6.1	Portable Source Start Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
52.	N	N	N	N	5.6.1	Portable Source End Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
53.	N	N	N	Y	5.6.1	Electronic Data Flag • Alphanumeric (1) • Valid Values: – Y – N
54.	N	N	N	Y	Comment Adjudication 8/24/2012	Federally Reportable Flag • Alphanumeric (1) • Valid Values: – Yes – No
55.	N	Y	Y	Y	5.6.1	Attainment/Nonattainment Status • Valid Values: – Attainment – Nonattainment – Unclassifiable • Imported from FRS
56.	N	N	N	Y		Nonattainment Area • Must be validated against REF table • Imported from FRS

ID	Key?	SR	PR	SG	Client Req ID	Requirement
57.	N	N	N	Y		Criteria Pollutant • Valid Values: – 1-Hour Ozone – 8-Hour Ozone (1997) – Carbon Monoxide – Nitrogen Dioxide – Sulfur Dioxide – PM-10 – PM-25 (2006) – PM-2.5 (1997) – Lead (2008) – Lead • Imported from FRS
58.	N	N	N	Y		Date of Extraction from Greenbook • Date • Imported from FRS
59.	N	N	N	N	5.6.1	Comments • Multiple for a Facility Record • Alphanumeric (500) • Free-form text
60.	N	N	N	N		Comment Entered On • Date • System generated
61.	N	N	N	N		Comment Entered By • Alphanumeric (50) • System generated
62.	N	N	N	N		Sensitive Comment • Alphanumeric (1) • Valid Values: – N – Y (Default)
63.	N	N	N	N	5.6.1	User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
64.	N	N	N	N	5.6.1	User Defined Field 2 • Alphanumeric (100) • Free-form text
65.	N	N	N	N	5.6.1	User Defined Field 3 • Alphanumeric (100) • Free-form text
66.	N	N	N	N	5.6.1	User Defined Field 4 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
67.	N	N	N	N	5.6.1	User Defined Field 5 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
68.	N	N	N	N	5.6.1	User Defined Field 6 • Alphanumeric (500) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Requirement

69.	N	N	N	Y	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	User Defined Field Enforcement Sensitive Flag
						• Alphanumeric (1)
						• Valid Values:
						  – Y (default)
						  – N

70.	N	N	N	N	5.6.1 BR pg 21	Registration Number • Alphanumeric (15)

71.	N	Y	Y	N	MDR	Government Ownership
						• Must be validated against Ref Table.
						• Valid Values:
						  – All other facilities not owned or operated by a federal, state, or local government (0)
						  – Source owned or operated by the federal government (1)
						  – Source owned or operated by the state (2)
						  – Source owned or operated by the country (3)
						  – Source owned or operated by the municipality (4)
						  – Source owned or operated by the district (5)

72.	N	Y	Y	N	5.6.2
					5.6.3
					BR pg 74
					MDR
						Applicable Air Programs
						• Must be validated against Ref Table.
						• Valid Values:
						  – State Implementation Plan (SIP) (0)
						  – SIP Source under Federal Jurisdiction (1)
						  – Non-Federally Reportable Source (3)
						  – Chlorofluorocarbons (CFC) Tracking (4)
						  – Prevention of Significant Deterioration (PSD) (6)
						  – New Source Review (NSR) (7)
						  – National Emission Standards for Hazardous Air Pollutants (NESHAP) (8)
						  – New Source Performance Standards (NSPS) (9)
						  – Acid Precipitation (A)
						  – Federally Enforceable State Operating Permit – Non Title V (FESOP) (F)
						  – Part 98, The Mandatory Greenhouse Gas (GHG)Reporting Rule (G)
						  – Native American (I)
						  – Maximum Achievable Control Technology (MACT) Section 63 NESHAP (M)
						  – Tribal Implementation Plan (TIP) (T)
						  – Title V Permits (V)
						  – Other

73.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Other Air Program • Alphanumeric (50) • Free-form text

74.	N	Y	Y	N	5.6.2
					MDR
					BR pg 74
						Air Program Operating Status
						• Must be validated against Ref Table.
						• Valid Values:
						  – Operating (O)
						  – Seasonal (I)
						  – Temporarily closed (T)
						  – Under Construction (C)
						  – Planned Facility (P)
						  – Permanently Closed (X)

ID	Key?	SR	PR	SG	Client Req ID	Requirement

75.	N	N	N	Y	5.6.2	Air Program Start Date
						• System generated default with user override option
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

76.	N	N	N	N	5.6.2	Air Program Shutdown Date
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

77.	N	N	Y	N	5.6.2 MDR BR pg 74	All Applicable Air Program Subparts • Valid value on subparts code table for the correct Air Program • Must be validated against Ref Table.

78.	N	Y	C	N	5.6.2
					MDR
					BR pg 74
						Air Program Subpart Operating Status
						• Valid Values
						  – Active
						  – Inactive

79.	N	N	N	Y	5.6.2	Air Program Subpart Start Date
						• System generated default with user override option
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

80.	N	N	N	N	5.6.2	Air Program Subpart Shutdown Date
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

81.	N	N	N	N	5.6.2	Air Program Comments • Multiple for an Air Program Record • Alphanumeric (500) • Free-form text
82.	N	Y	C	N	5.6.3 MDR BR pg 74	Pollutant Code • Must be validated against Ref Table. • 5 digit code from Legacy AFS • OR Pollutant ID • Conditionally required if CASN is not entered
83.	N	Y	Y	Y	5.6.3 MDR	Chemical Abstract Service Number • Must be validated against Ref Table • 9 digit Numeric code • System generated if Pollutant Code is entered

84.	N	N	C	N	BRC pg. 31	Classification-EPA
						• Conditionally system required if entered by EPA user if Classification-EPA is not entered
						• Must be validated against Ref Table.
						• Valid Values:
						  – Major Emissions (A)
						  – Synthetic Minor Emissions (SM)
						  – Minor Emissions (B)
						  – Emissions classification unknown (C)

85.	N	N	C	N	5.6.3
					BR pg 74
						Classification-Delegated Agency
						• Conditionally system required if entered by EPA if Classification-EPA is not entered
						• System Required if entered by Delegated Agency user
						• Must be validated against Ref Table.
						• Valid Values:
						  – A - Major emissions
						  – SM - Synthetic Minor Emissions
						  – B - Minor Emission
						  – C - Emissions classification unknown

ID	Key?	SR	PR	SG	Client Req ID	Requirement
86.	N	Y	Y	Y	Tier 3	Default Classification • System Generated based upon most stringent Classification
87.	N	N	N	N	5.6.3	Air Program Subpart Comments • Multiple for an Air Program Subpart Record • Alphanumeric (500) • Free-form text
88.	N	N	N	Y		Created By • System Generated based upon User ID
89.	N	N	N	Y		Created Date • System Generated • Date
90.	N	N	N	Y		Last Modified By • System Generated based upon User ID
91.	N	N	N	Y		Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/Conditional/No); SG = System Generated (Yes/No)

3.1.1.4   Facility Business Rule Requirements

Table 3.1-6 lists the business rules requirements that apply to Facility. This table includes the business rules for data elements and error handling.

Table 3.1-6. ICIS-Air Facility Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.4.6	The Facility must be unique within the system. A Facility is uniquely defined by the Facility ID.	ICIS-Air version 1.0
2.	5.5.2	A Facility may be associated with multiple Air Programs.	ICIS-Air version 1.0
3.	5.6.2	When an Air Program is added, an Air Program Start Date will be defaulted to the current date for each new Air Program.	ICIS-Air version 1.0
4.	5.2.4, Comment Adjudication meeting 8/24/2012	If users enter an Air Program Operating Status Start Date date greater than current date, the system shall display a warning message.	ICIS-Air version 1.0
5.	Comment Adjudication meeting 8/24/2012	When an Air Program Operating Status is changed from 'Permanently Closed' to 'Operating', the Restart Date will be displayed as the Air Program Operating Status Start Date.	ICIS-Air version 1.0
6.	N/A	The most active Air Program operating status will roll up to the Facility Record level according to the following hierarchy (top is most active): • Operating • Seasonal • Temporarily Closed • Under Construction • Planned Facility • Permanently Closed.	ICIS-Air version 1.0
7.	Comment Adjudication meeting 8/24/2012	When an Air Program 'Other' is selected, Air Program Other Description must be populated.	ICIS-Air version 1.0
8.	Comment Adjudication meeting 8/24/2012	When an Air Program 'Other' is selected, a Federal Air Program must also be selected.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
9.	Comment Adjudication meeting 8/24/2012	If a Facility only has an active air program of Title V, users may select "No Pollutant Identified" from the Pollutant codes.	ICIS-Air version 1.0
10.	5.6.2	When an operating status of PERMANENTLY CLOSED is entered for an Air Program, the Air Program Shutdown date will be defaulted to the current date.	ICIS-Air version 1.0
11.	N/A	An Air Program Subpart may only be associated with a Facility if its parent Air Program has already been associated with the Facility.	ICIS-Air version 1.0
12.	N/A	An Air Program may be associated with multiple Air Programs subparts.	ICIS-Air version 1.0
13.	BRC 30	An Air Program Subpart or Subparts can be entered when any of the following Air Programs are selected • State Implementation Plan (SIP) (0) • SIP Source under Federal Jurisdiction (1) • NESHAP (8) • NSPS (9) • MACT (M)	ICIS-Air version 1.0
14.	5.2.4	If the user adds or changes the Air Program Subpart Start Date to a date greater than current date, the system shall display a warning message.	ICIS-Air version 1.0
15.	5.6.2	When an operating status of PERMANENTLY CLOSED is entered for an Air Program, all Air Program subparts with an operating status of Active for that program will be marked Inactive and their status dates updated with the Program Shutdown date.	ICIS-Air version 1.0
16.	5.6.2	When operating status of Inactive is entered for an Air Program subpart, Air Program Subpart Shutdown date will be defaulted to the current date.	ICIS-Air version 1.0
17.	5.5.2	A Facility may be associated with multiple Pollutants.	ICIS-Air version 1.0
18.	N/A	A pollutant may only be associated with a Facility once.	ICIS-Air version 1.0
19.	5.6.3	If the Pollutant Code is provided, the system will populate the Chemical Abstract Service Number (CASN).	ICIS-Air version 1.0
20.	5.6.3	If the CASN field is provided, the system will populate the Pollutant Code.	ICIS-Air version 1.0
21.	N/A	When a pollutant is associated with a Facility, a Classification Value and start must be entered for the Pollutant.	ICIS-Air version 1.0
22.	N/A	Classification Start Date will be defaulted to date of data entry.	ICIS-Air version 1.0
23.	N/A	Users cannot blank out the Pollutant Classification Start Date.	ICIS-Air version 1.0
24.	N/A	Users cannot change Pollutant Classification Start Date to a date greater than current date.	ICIS-Air version 1.0
25.	N/A	The Pollutant Record level will display the current EPA and Delegated Agency classification, based upon dates.	ICIS-Air version 1.0
26.	N/A	The Facility Record level will display the EPA and Delegated Agency Pollutant Classifications with the greatest severity.	ICIS-Air version 1.0
27.	N/A	The highest Pollutant Classification will roll up to the Facility for both EPA and Delegated Agency Classification according to the following hierarchy (top is highest): • Major emissions (A) • Synthetic Minor emissions (SM) • Minor emission (B) • Emissions classification is unknown (C)	ICIS-Air version 1.0
28.	Comment Adjudication meeting 8/24/2012	The highest classification between the EPA and Delegated Agency classification will be the default Facility Classification value.	ICIS-Air version 1.0
29.	N/A	A change to the current Pollutant value will change the history of	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
		Pollutant Classification.	
30.	BRC pg. 20	When a Facility changes ownership, the new owner will be recorded, and the history of the Facility will remain with the current Facility.	ICIS-Air version 1.0
31.	N/A	When a Facility Name changes, the system will populate the Previous Facility Name table with the previous Facility Name.	ICIS-Air version 1.0
32.	N/A	The same SIC Code cannot be included multiple times.	ICIS-Air version 1.0
33.	N/A	The same NAICS Code cannot be included multiple times.	ICIS-Air version 1.0
34.	N/A	Multiple Contacts may be associated with a Facility.	ICIS-Air version 1.0
35.	N/A	One Address may be associated with a Contact Record.	ICIS-Air version 1.0
36.	Comment Adjudication meeting 8/24/2012	When a Contact with Affiliation type of "Owner" is added, edited, or deleted, it will be written to a Facility Owner history table.	ICIS-Air version 1.0
37.	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	The County, City, and LCON results selection values will be filtered based upon a user's selection of the State value(s).	ICIS-Air version 1.0
38.	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	The City and LCON results selection values will be filtered based upon a user's selection of the County value(s).	ICIS-Air version 1.0
39.	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	The County and State results selection values will be filtered based upon a user's selection of the LCON value(s).	ICIS-Air version 1.0
40.	CRR	If the user enters Latitude/Logitude data for a Facility, the FRS data refresh will not overwrite the user-provided data.	ICIS-Air version 1.0
41.	CRR	If the user updates Latitude/Logitude data that had been imported from FRS for a Facility, the FRS data refresh will not overwrite the user-provided data.	ICIS-Air version 1.0
42.		If the user provides Portable Source data for a Facility, the FRS data refresh will not overwrite the user-provided data.	ICIS-Air version 1.0
43.		If the user updates Portable Source data that had been imported from FRS for a Facility, the FRS data refresh will not overwrite the user-provided data.	ICIS-Air version 1.0

3.1.1.5 Add Facility

A Facility is uniquely identified by the following key data elements:

- Facility ID.

The following data elements are required to add a new Facility in ICIS-Air:

- Facility ID
- Facility Site Name
- Facility Address

- Facility State
- Facility County
- Facility City
- Facility Zip Code
- Primary NAICS
- At least one (1) Air Program with Operating Status
- At least one (1) Pollutant with Classification.

Batch

Batch users will have an Add Facility transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements and business rules sections for more details on rejecting Facility add transactions.

Figure 2.3-1 illustrates the processing required for adding a Facility to ICIS-Air through a batch transaction.

Figure 3.1-1. Use Case: Add Facility—Batch
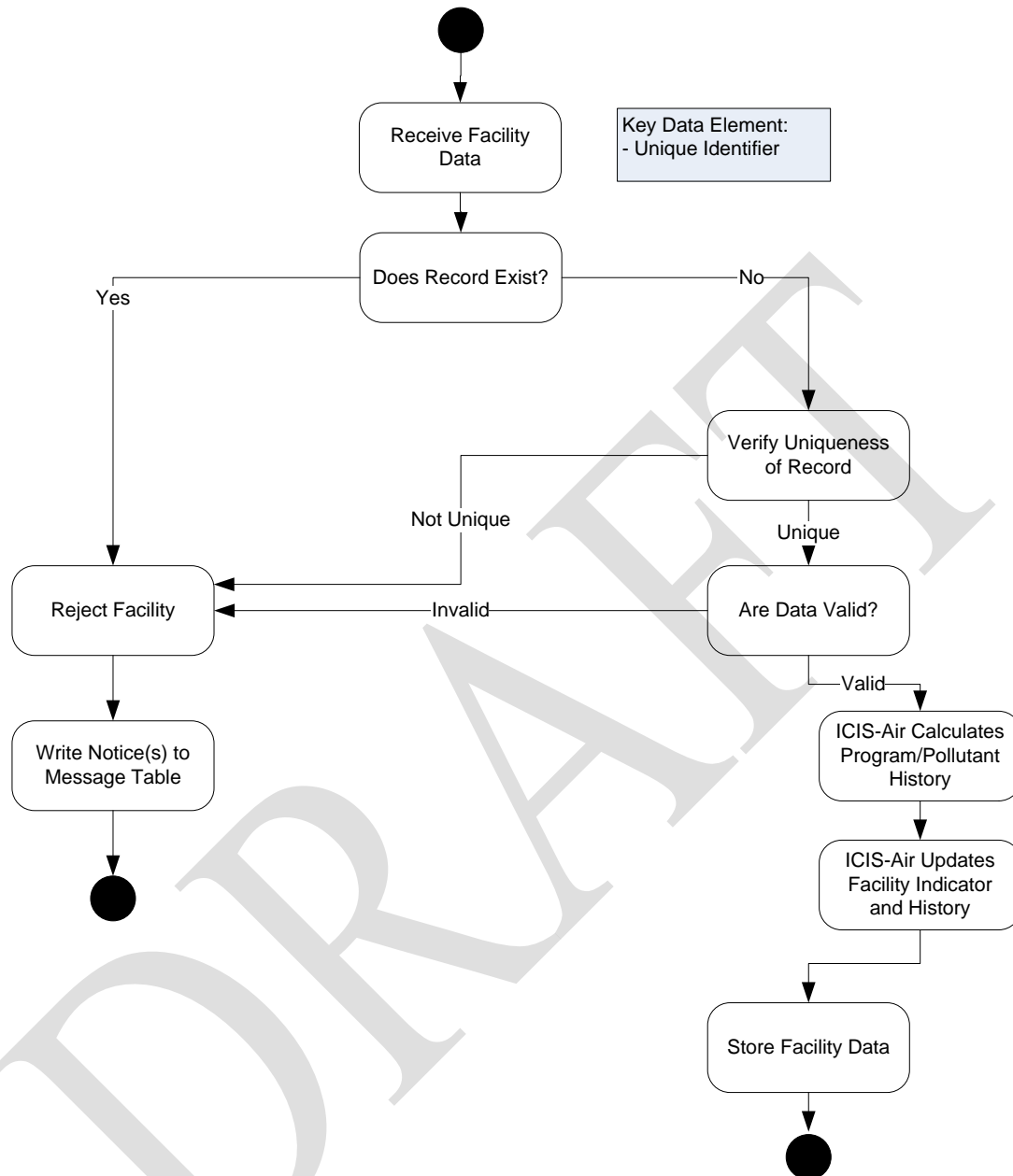
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.1.1.3, Facility Data Elements, and Section 3.1.1.4, Facility Business Rules, for more details.

Figure 3.1-2 illustrates the processing required for adding a traditional Facility in ICIS-Air online.

Figure 3.1-2. Use Case: Add Facility—Web

Figure 3.1-3 shows the Notional Add Facility screen.

Figure 3.1-3. Notional Screen: Add Facility

Figure 3.1-4. Notional Screen: List Air Programs

Figure 3.1-5. Notional Screen: List Pollutants

3.1.1.6   Edit Facility

Users can edit a Facility within the current view of the Facility record. A user will also have the ability to edit the Pollutant Classification and Air Program Operating Status on the Air Program and Pollutant screens, respectively. Changes and updates to these data fields will result in changes on the displayed fields on the Facility.

The following data elements are key data elements that uniquely identify a Facility record and cannot be edited through the Edit Facility transaction:

- Facility ID

The following data elements are generated by the system or imported from an interface system and cannot be edited through the Edit Facility transaction:

- Current Default Classification
- Current Default Classification Start Date
- Current Operating Status
- Current HPV Flag
- Current CMS Indicator
- Electronic Data Indicators
- Monitor Indicator
- Attainment/Nonattainment Information

Batch

Batch users will have an Edit Facility transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.1.1.3 and business rules in Section 3.1.1.4 for more details on rejecting Facility edit transactions.

Figure 3.1-6 illustrates the processing required for editing a Facility in ICIS-Air through a batch transaction.

Figure 3.1-6. Use Case: Edit Facility—Batch
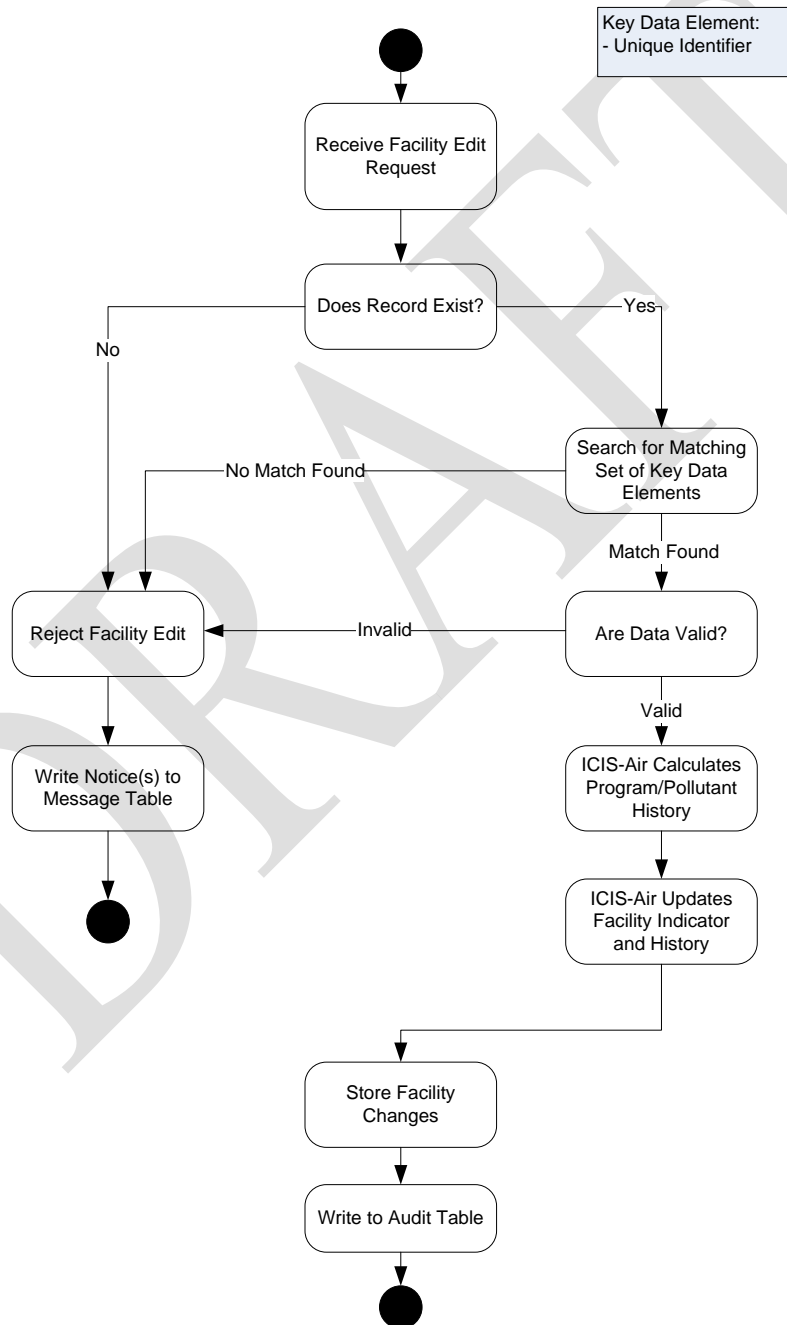
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See 3.1.1.3, Facility Data Elements, and Section 3.1.1.4, Facility Business Rules, for more details.

Users may edit a Facility by accessing the List Facility screen, selecting the desired Facility, and clicking on the Edit button. ICIS-Air will display the Edit Facility screen for the selected traditional Facility.

Figure 3.1-7 illustrates the processing required for editing a Facility in ICIS-Air online.

Figure 3.1-7. Use Case: Edit Facility—Web
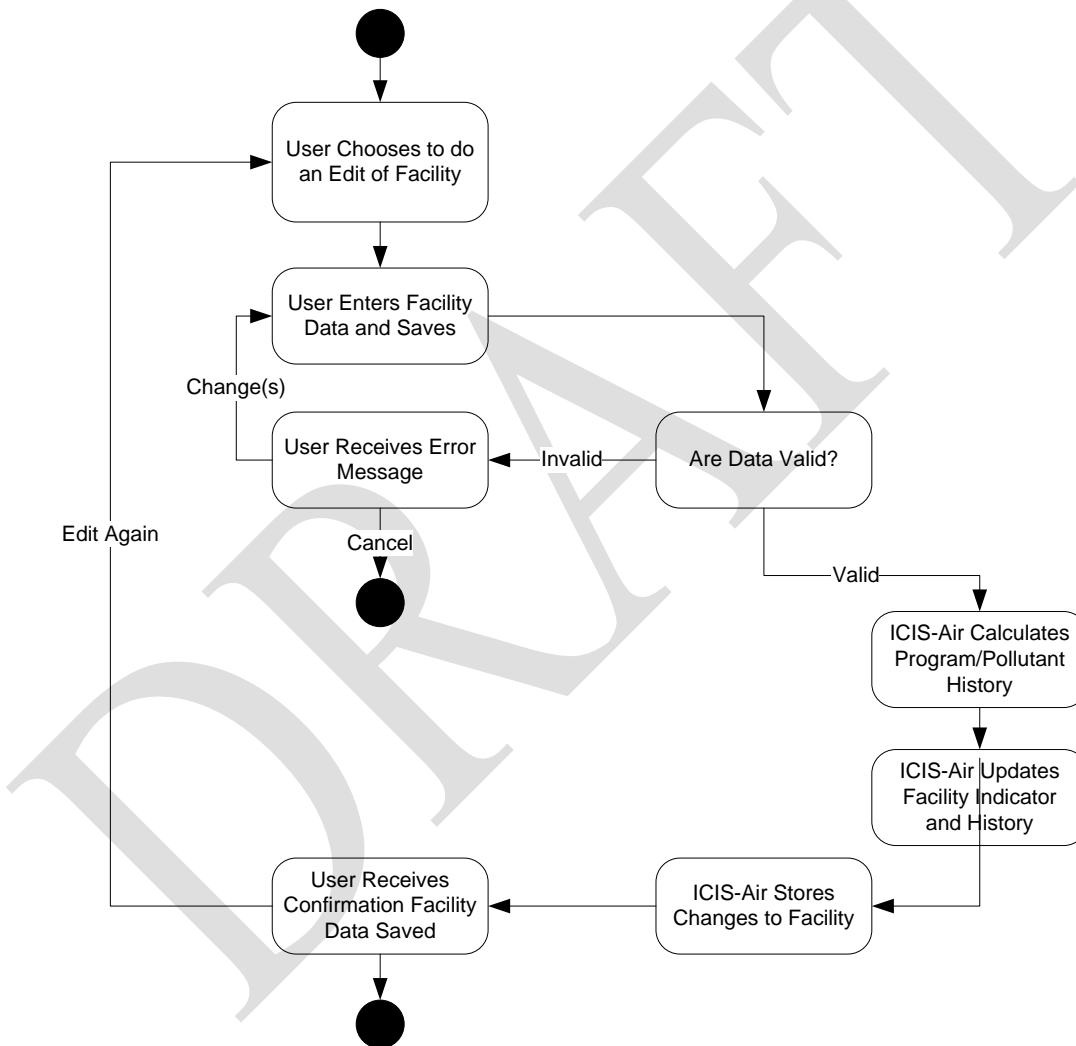
Figure 3.1-8 shows the Notional Edit Facility screen.

Figure 3.1-8. Notional Screen: Edit Facility

Integrated Compliance Information System

HOME
HELP
LOGOUT
FEEDBACK

Home ; Search Facilities ; Edit Facility ; Basic Info

| FACILITY | COMPLIANCE MONITORING | ALLEGED VIOLATION FILE | ENFORCEMENT ACTIONS | AIR PERMIT |

Basic Info   Air Programs   Pollutants   CMS   Summary   Incident

Facility ID: AFS1234566777
FRS ID: 6187234566904

Facility Location Information

*Facility Site Name: McLean Co.   Default Classification: Major
Previous Facility Site Name: EPA Classification: Major
Facility Description: Delegated Agency Classification: Major
    *County: 003
*Address: 825 Clean Air   SEARCH REMOVE
*City: Juno   Local Control Agency: A1
*State: AK   SEARCH REMOVE
*Zip Code: 12345   LCON Description: Fairbanks
    Tribal Land: S15 - Sitka Tribe of Alaska
    SEARCH REMOVE

Associate Corporate Entity   ADD CORPORATE ENTITY

Corporate Entity	Start Date	End Date
Exxon Mobil	10/05/2010	

Attainment/Nonattainment

Attainment Status	Criteria Pollutant	Nonattainment Area	Date of Extraction from Green Book
Nonattainment	PM-10	ANCHORAGE	10/05/2010
Nonattainment	Sulfur Dioxide	ANCHORAGE	06/01/2010

Initiatives | **Other Facility Information**

National Initiatives: Small Business: ☑   Electronic Data: ☑   Federally Reportable: ☑
ADD/REMOVE   Registration Number: Government Ownership:

NAICS/SIC | **Portable Source**

*Primary NAICS: 238990 All Other Specialty   Portable Source Indicator:
NAICS Codes: Site Name:
ADD/REMOVE   Start Date:
*Primary SIC: 1231 Anthracite Mining   End Date:
SIC Codes:
ADD/REMOVE

Latitude/Longitude

NOTE: Please use either decimal degrees or degrees, minutes, seconds when entering latitude/longitude information.

Latitude
Decimal Degrees: 61.2324   or   Degrees, Minutes, Seconds: + 61 13 56 6

Longitude
Decimal Degrees: -149.8909   or   Degrees, Minutes, Seconds: - 149 53 27 2

Horizontal Accuracy Measure: Facility Source Map Scale Number: **Universal Transverse Mercator Coordinates**
Geometric Type: Horizontal Reference Datum: UTM Coordinate 1:
Horizontal Collection Method: Reference Point: UTM Coordinate 2:
    UTM Coordinate 3:

Comments   Manage Comments

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Henri	Comment ABC	Yes
05/01/2010	Anne Matlock	Comment XYZ	
04/01/2010	T.J. Wellington	Comment 123	

User Defined Fields   Sensitive: ☑

1: ☑
2:    3:
4:    5:
6:

Contacts and Addresses   Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization
Miller	Stephanie	Phuong	Owner	123 Main St., McLean, VA 22222	221-222-2223	221-323-2323	s.miller@owner.com		McLean Air Company

Created By: Vince Henri Created Date: 03/01/2010
Last Modified By: Vince Henri Last Modified Date: 05/30/2010

Save & Exit   Save & Continue   Save & Add Linked Activity   Select Type   Cancel

Figure 3.1-9 shows the Notional Facility Summary screen.

Figure 3.1-9. Notional Screen: Facility Summary

Users will have the ability to add, edit, or delete Air Program records from the Air Programs screen. Figure 3.1-10 shows the notional Edit Air Program screen.

Figure 3.1-10. Notional Screen: Edit Air Program

Users will have the ability to add, edit, or delete Pollutant records from the Pollutants screen. Figure 3.1-11 shows the notional Edit Pollutant screen.

Figure 3.1-11. Notional Screen: Edit Pollutant (Delegated Agency View)

3.1.1.7   Delete Facility

When users delete a Facility, all associated records will be deleted for that Facility including Air Program and Pollutant records and any linkages to Permit and CMS information. A User may delete any Facility if they have been granted the appropriate privileges. An error warning will be issued prior to the completion of the delete transaction for Facilities that have Associated Records.

Batch

Batch users will have Delete Facility transactions rejected if the record does not exist, or the business rules are violated.

Figure 3.1-12 illustrates the processing required for deleting a Facility from ICIS-Air through a batch transaction.

Figure 3.1-12. Use Case: Delete Facility—Batch

Web
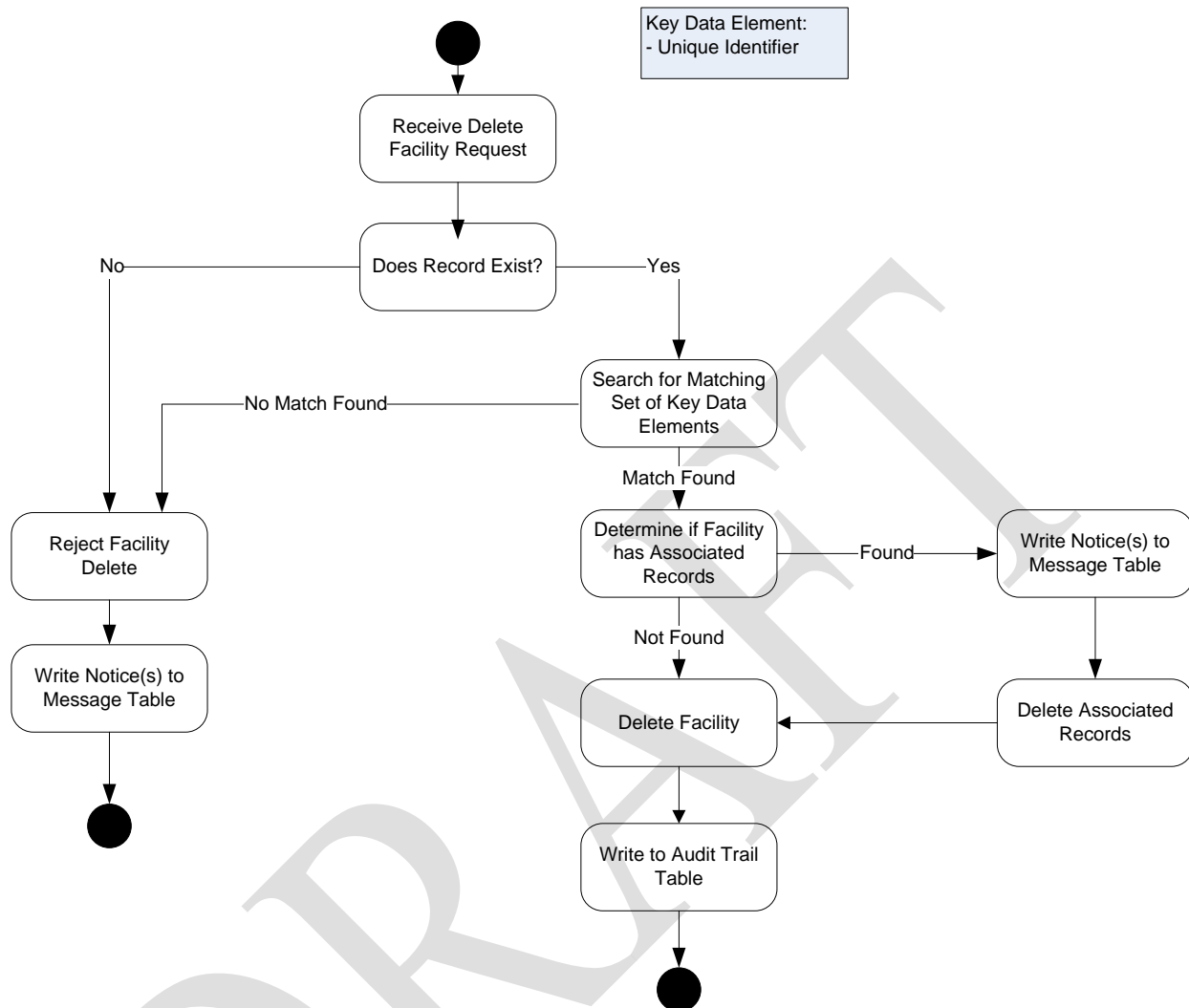
Web users will receive an error message if the business rules are violated.

Users may delete a Facility by accessing the List Facility screen, selecting the Facility they wish to delete, and clicking on the Delete button.

Figure 3.1-13 illustrates the processing required for deleting a Facility from ICIS-Air online.

Figure 3.1-13. Use Case: Delete Facility—Web
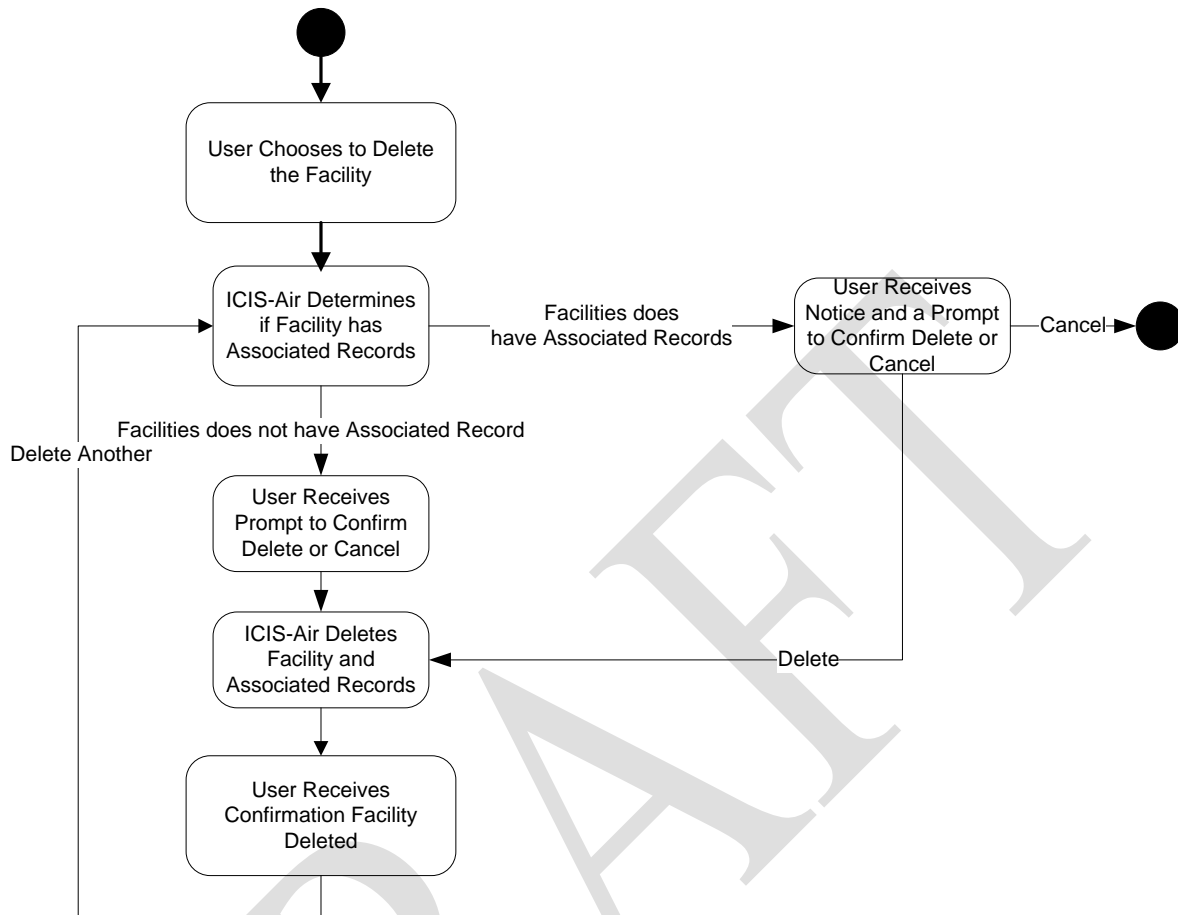
3.1.1.8   Conditional Delete Facility – Batch Only

Because batch users are unable to see a warning message prior to the system deleting records, ICIS-Air will provide a batch conditional delete transaction for Facility in which the system rejects the deletion request if there are associated records for the Facility. This action will provide batch users extra assurance that the delete they are performing is correct and will prevent the unintentional deletion of associated records.

Batch users will have Conditional Delete Facility transactions rejected if the record does not exist or the business rules are violated.

Figure 3.1-14. Use Case: Conditional Delete Facility – Batch Only
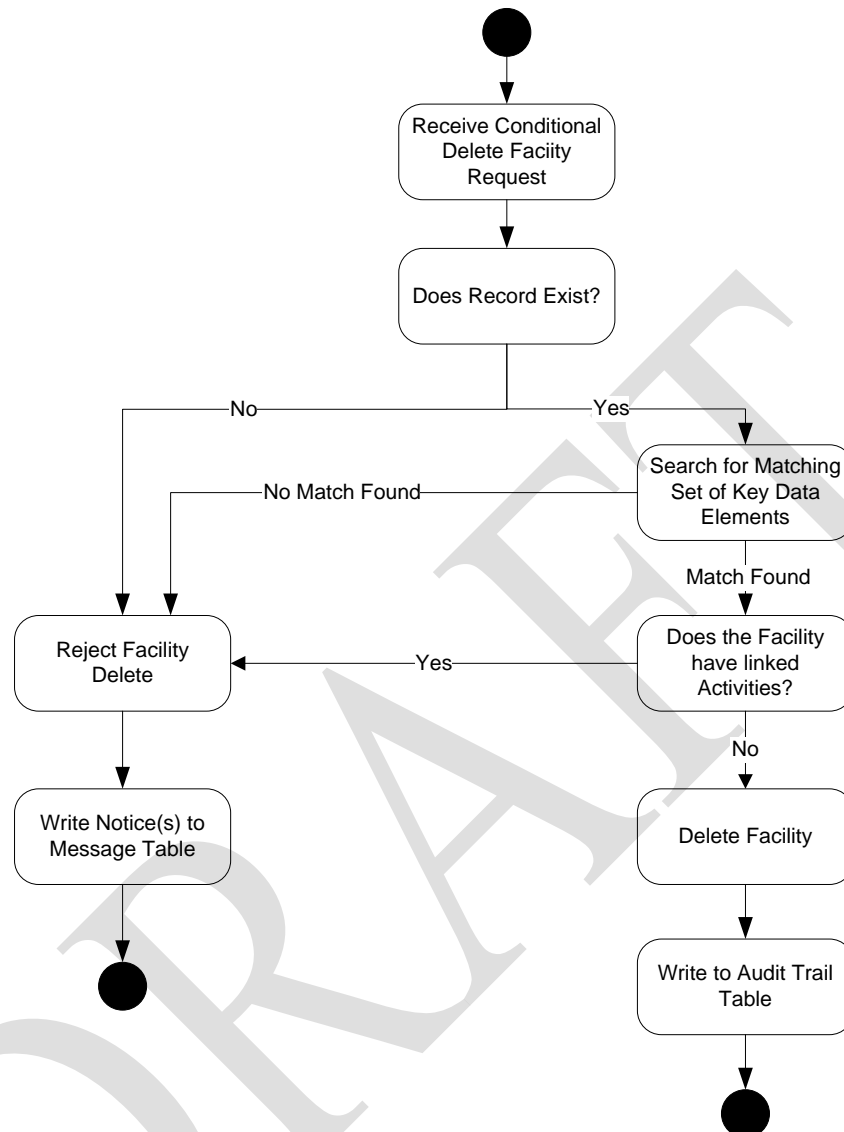
3.1.1.9   List Facilities—Web Only

Users will be able to view a list of all Facilities. Users will access this screen by clicking on the Search Facility link. ICIS-Air will then display the List Facility screen populated with a list of all Facilities, in a predetermined sort order.

From the Facility List screen, users can perform the following operations:

- Add Facility
- Edit Facility
- Copy Facility
- Delete Facility.

Figure 3.1-15 shows the user interface for searching Facilities and Figure 3.1-16 shows the notional user interface for viewing a list of Facilities from search results.

Figure 3.1-15. Notional Screen: Search Facilities

Figure 3.1-16. Notional Screen: List Facilities

3.1.2 CAA Stationary Source Compliance Monitoring Strategy

The Compliance Monitoring Strategy (CMS) provides national consistency in developing stationary source air compliance monitoring programs while allowing Delegated Agencies flexibility to address local air pollution and compliance problems. The CMS plan provides a framework for developing stationary source air compliance monitoring programs that focus on achieving measurable environmental results. Agencies record their compliance monitoring activities and enter facility-specific compliance data in ICIS-Air.

The CMS outlines core compliance monitoring activities and focuses on federal enforceable requirements for Title V major sources and synthetic minor sources that emit or have the potential to emit at or above 80 percent of the Title V major source threshold (SM-80). The CMS provides recommended minimum evaluation frequencies. Facilities are grouped into CMS Categories and each CMS Category contains a default recommended minimum CMS Frequency requirement for the Regulatory Agency to perform Full Compliance Evaluations (FCEs).

A feature of the CMS is the ability for ICIS-Air to generate a CMS Status for any Facility that has not received an FCE within its negotiated CMS Frequency. ICIS-Air will generate the CMS Status based on frozen historical data for a fiscal year. Additionally, the current CMS Status will be updated in real time against live data when there is a change to the CMS record or the Latest FCE Actual End Date.

The CMS functionality in ICIS-Air will be updated to be more transparent and provide easier reporting. Basic concepts will not change, such as minimum data requirements and determining whether a Facility has received an FCE within its negotiated CMS Frequency, will remain the same. New system-calculated data elements will be introduced to facilitate status calculations, and will be displayed on the user interface to provide users with data for planning and analysis purposes. Consequently, the process to generate the CMS Status will be different but the end result will be the same.

The requirements, functionality, data elements, and business rules that support the oversight and implementation of the Compliance Monitoring Strategy are detailed in the following subsections.

3.1.2.1 Summary of Compliance Monitoring Strategy Modernization in ICIS-Air

Some Compliance Monitoring Strategy functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Nomenclature Change for CMS Indicator**
  In legacy AFS, the term CMS Indicator was used to indicate whether the Regulatory Agency has performed an FCE at the Facility per CMS plan. ICIS-Air will use the term CMS Status to indicate the status of a Facility's FCE in relation to the Agency's CMS plan.

- **Archiving and Generating Historical CMS Records**
  In legacy AFS, historical CMS records are archived manually for ten years. ICIS-Air will automatically archive historical CMS records for as many years as EPA chooses to archive. The system will introduce two configurable days, Day X and Day Y, for System Administrators to customize exactly when the system will automatically archive historical CMS records, such as October 1 for Day X and when the system will archive and calculate the fiscal year (FY) CMS Status, such as December 1 for Day Y.

  ICIS-Air will automatically archive CMS data elements and values on Day X of each fiscal year. These data will be used to run against the Latest FCE Actual End Date to generate the official CMS Status for that fiscal year. There will be a two-step process for creating the historical record:

1. On "Day X", the day following the end of the FY (October 1 in legacy AFS), ICIS-Air will make a copy (snapshot) of all CMS data elements and values

2. On "Day Y[5]", following the end of the fiscal year (December 1 in legacy AFS), the historical record created on October 1 will be automatically updated with the Latest FCE information and any change to the CMS record made on or after Day X, in this case October 1, and the CMS Status for that fiscal year will be calculated.

- **Calculation of a Separate CMS Status**

  In legacy AFS, if a Facility was overdue for its required FCE, a compliance status of "Unknown" would be written to the Facility compliance status. In ICIS-Air, a new specific CMS Status will be tracked that is separate from any other Facility-level statuses.

- **Generation of Two CMS Statuses**

  In legacy AFS, only the fiscal year CMS Status was generated based on historical data. ICIS-Air will track two CMS Statuses:

  1. A *Current CMS Status* will be generated based on: 1) real-time changes to the CMS data, 2) Latest FCE Actual End Date, or 3) on a scheduled basis on Day Y (December 1) to provide information in assisting Delegated Agencies in targeting Facilities for FCEs. Figure 3.1-17 below provides the high-level background process for generating the Current CMS Status.

Figure 3.1-17. High-Level Process for Generating Current CMS Status
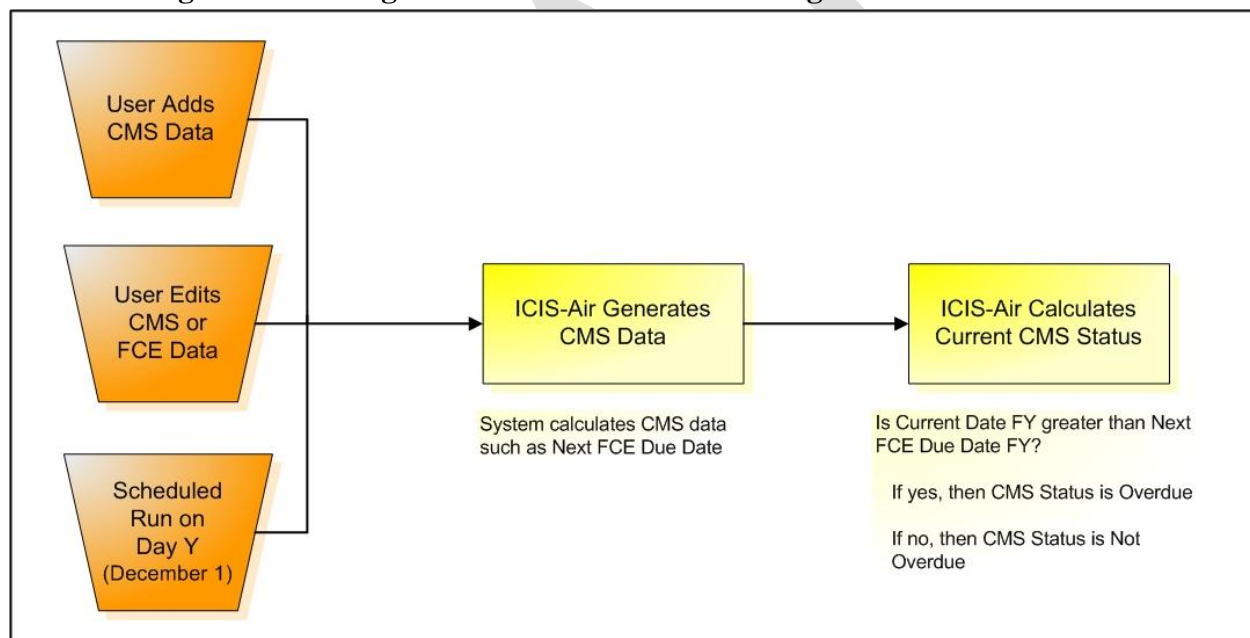
  2. An *FY CMS Status* will be generated on December 1 based on historical fiscal year data to provide the status of the FCE for the previous fiscal year (see Figure 3.1-18). The FY CMS Status will be generated on December 1 to allow

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[5] This delay between the end of the fiscal year and calculation of the official CMS indicator for that fiscal year allows time for data entry of activities completed on or before September 30. Refer to the 60 day timeliness standard.

sufficient time for data entry of FCE activities completed on or before September 30. Refer to the 60 day timeliness standard.

Figure 3.1-18. High-Level Process for Generating FY CMS Status
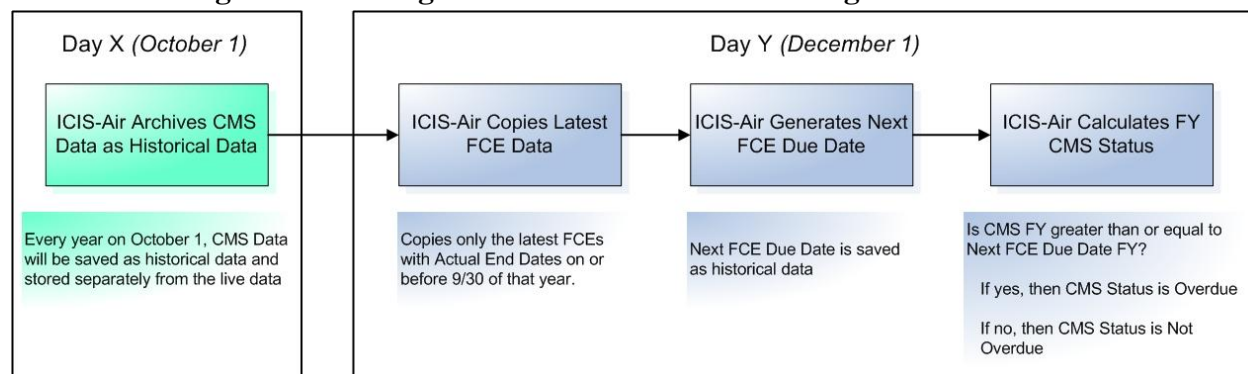
- **Frequency of Updating CMS Status**

  In legacy AFS, the process to remove Unknown compliance status runs monthly at the end of each month. ICIS-Air will run the background process to update the current CMS Status in real time against the current live data when there is a new CMS record, a change to the CMS record, or a change to the Latest FCE Actual End Date via an update or deletion of the FCE record or the addition of an FCE for that facility with a more recent Actual End Date. Unless there is a change to the CMS or FCE record, the Current CMS Status will not run from October 1 and November 30 to provide time for users to enter FCE data. However, this process will run will run on December 1, to capture the universe of Facilities with FCEs due to have completed their evaluations by the end of the fiscal year and update their current CMS Status. As noted above, the "official" historical record for the previous fiscal year will be calculated on December 1.

- **CMS Status Algorithm**

  ICIS-Air will use a streamlined algorithm to calculate the CMS Status to facilitate data analysis and reporting. The CMS Status will be calculated by comparing the Current Date's fiscal year and the Latest FCE Actual End Date's fiscal year to the Next FCE Due Date's fiscal year. If the Facility has not received an FCE by the Next FCE Due Date when the CMS Status processing occurs, then the CMS Status will display "Overdue".

- **Structure of New CMS Record**

  In legacy AFS, calculated data generated by the CMS Indicator Algorithm were not stored. ICIS-Air will introduce new data elements to store system generated and calculated data for CMS reporting purposes. While there are new data elements, users will continue to enter the same two minimum data requirements, CMS Category and CMS Frequency. These new system generated data elements will be displayed on the screen as read-only. The table below provides detailed information of the list of new and existing CMS data elements.

Table 3.1-7. CMS Data Structure and Definitions

Data Element Name	How Element Maps to Mainframe AFS	User Entered or System Generated	Optional or Required	Definition
CMS Category	CMS Category (CMSC)	User Entered	Required	The CMS Category assigned to the Facility.

Data Element Name	How Element Maps to Mainframe AFS	User Entered or System Generated	Optional or Required	Definition
CMS Frequency	CMS Frequency (CMSI)	User Entered – Defaults to the minimum CMS Frequency based on selected CMS Category	Required	The Frequency which FCEs should be conducted at that facility per the CMS plan, supplied by the user.
CMS Start Date	CMS Start Date	User Entered – Defaults to the Current Date	Optional	The CMS Start Date is the start date of the CMS Category/Frequency. It only changes when the CMS Category is upgraded from a lower category to a higher category, which triggers a change to the CMS Frequency, or a user manually edits the date to make a data correction.
Reason for Changing CMS	New data element	User Entered	Optional	ICIS-Air will provide a data element to document the reason for changing the CMS Category or Frequency. Users are encouraged, but not required, to document the reason for a change.
Active on CMS Plan	New data element that maps to the Delete action in mainframe AFS	User Entered – Defaults to Yes	Optional	ICIS-Air will allow users to indicate whether a Facility currently is in the CMS Plan. Users are encouraged, but not required, to update this to "Not Active" when a Facility is removed from the Agency's CMS Plan so the Facility is not listed as requiring an FCE or not having received one per schedule if none is required on the Plan..
Date Removed from CMS Plan	New data element	System Generated with User Entered override – Defaults to the Current Date when user sets the Active on CMS Plan to No	System Generated	Users will be able to document the date when the Facility was removed from the CMS Plan.
CMS Effective Frequency	New data element that maps to the CMS Frequency and default CMS Frequency in mainframe AFS.	System Generated	System Generated	The CMS Effective Frequency will be a system generated data element based on the CMS Frequency or each CMS Category's default recommended minimum CMS Frequency. If the CMS Frequency is less than the default CMS Frequency, then the CMS Effective Frequency is the default CMS Frequency; if the CMS Frequency is greater than or equal to the default CMS Frequency, then the CMS Effective Frequency is the CMS Frequency. The CMS Effective Frequency will be used to generate the Next FCE Due Date.

Data Element Name	How Element Maps to Mainframe AFS	User Entered or System Generated	Optional or Required	Definition
CMS Origination Date	New data element that maps to first ever CMS Start Date in mainframe AFS	System Generated	System Generated	The CMS Origination Date is a new data element that captures the original date that a Facility is added to the state or local CMS Plan. This date will default to the first CMS Start Date for new CMS records and must be less than or equal to the Current Date. Users cannot change this date once a new CMS record is saved.
CMS Effective Date	New data element that maps to CMS Start Date or latest FCE Actual End Date	System Generated	System Generated	The CMS Effective Date is a new data element used to calculate the Next FCE Due Date. The CMS Effective Date is the most recent Actual End Date for all FCEs at the Facility, if present. If an FCE Actual End Date does not exist or there is a change in the CMS Start Date, the CMS Effective Date will be set to the current CMS Start Date.
Next FCE Due Date	New calculated data element	System Generated	System Generated	The Next FCE Due Date is a new calculated field which determines when the Facility is due to have its next FCE. This date is used to generate the CMS Status. The algorithm to calculate the Next FCE Due Date is CMS Effective Date plus CMS Effective Frequency, rounded to the last day of that fiscal year.
CMS Status	CMS Indicator	System Generated	System Generated	Indicates whether a Facility has had an FCE within the negotiated CMS Effective Frequency.

- **Removing a CMS Record from Facility's CMS Plan**

  In legacy AFS, a user would send a Delete action to remove a CMS record permanently from the system. In place of permanently deleting the CMS record, ICIS-Air will provide the users the capability to set the CMS record to inactive and capture the date it was set to inactive. If the Facility were removed from the Agency's CMS plan after receiving an FCE, this would give credit to the Agency for completing the FCE at Facility per the CMS plan even though the Facility is no longer active on the plan. Inactive CMS records will not count against a Facility's CMS plan.

  There will be a Delete option only for system administrators to permanently remove a CMS record if they were erroneously added to the system.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Compliance Monitoring Strategy in ICIS-Air.

3.1.2.2 *Compliance Monitoring Strategy Functional Requirements*

Table 3.1-8 lists the requirements that apply to Compliance Monitoring Strategy. It includes functions that are allowed and business rules within a function.

Table 3.1-8. ICIS-Air Compliance Monitoring Strategy Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.2	EPA SRS	The system shall allow the user to add a new CMS record for a Facility.	ICIS-Air version 1.0
2.	N/A		The system shall allow the user to edit an existing CMS record.	ICIS-Air version 1.0
3.	N/A	EPA SME Meeting	The system shall allow the user to delete an existing CMS record.	ICIS-Air version 1.0
4.	N/A	EPA SME Meeting	The system shall allow the user to indicate whether the Facility has been removed from the CMS plan.	ICIS-Air version 1.0

5.	5.8.1, 5.8.4, 5.8.5, 5.8.6	EPA SRS	The system shall display the following data elements on the CMS screen:
			• Facility ID
			• Facility Name
			• CMS Origination Date
			• CMS Start Date
			• CMS Category
			• CMS Frequency
			• Latest FCE Actual End Date
			• Compliance Monitoring Type
			• Agency
			• CMS Effective Date
			• CMS Effective Frequency
			• Next FCE Due Date
			• Current CMS Status
			• Reason for Changing CMS
			• Active on CMS Plan
			• Date Removed from CMS Plan
			• Planned Full Compliance Evaluations
			  – Fiscal Year
			  – On or Off-Site Evaluation
			  – Comments
				ICIS-Air version 1.0

6.	5.8.1	EPA SRS	The system shall require the user to select one CMS Category from a list.	ICIS-Air version 1.0
7.	5.8.1	EPA SRS	The system shall display a default CMS Frequency based on the selected CMS Category.	ICIS-Air version 1.0
8.	5.8.1	EPA SRS	The system shall allow the user to edit the CMS Frequency.	ICIS-Air version 1.0
9.	5.8.1	EPA SRS	The system shall display the following data values on the CMS screen to users with Enforcement Sensitive Access only. Refer to ICIS-Air Security Requirements. • CMS Frequency • CMS Effective Date • CMS Effective Frequency • Next FCE Due Date • Current CMS Status • Planned Full Compliance Evaluations Fiscal Year • Planned Full Compliance Evaluations On or Off-Site Evaluation • Planned Full Compliance Evaluations Comments	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
10.	5.8.1	EPA SRS	The system shall display the following data element name only on the CMS screen to users without Enforcement Sensitive Access: • CMS Frequency • CMS Effective Date • CMS Effective Frequency • Next FCE Due Date • Current CMS Status • Planned Full Compliance Evaluations Fiscal Year • Planned Full Compliance Evaluations On or Off-Site Evaluation • Planned Full Compliance Evaluations Comments	ICIS-Air version 1.0
11.	N/A	N/A	The system will generate the following non-editable data elements: • CMS Origination Date • CMS Effective Frequency • CMS Effective Date • Next FCE Due Date • CMS Status	ICIS-Air version 1.0
12.	N/A	EPA SME Meeting	The system shall allow the user to enter a Reason for Changing the CMS record.	ICIS-Air version 1.0
13.	5.8.2	EPA SRS	The system shall allow authorized users to set the "Day Y" value for when to archive and calculate the historical CMS data elements and values.	ICIS-Air version 1.0
14.	5.8.3	EPA SRS	The system shall have the option for the user to enter one or more planned full compliance evaluations.	ICIS-Air version 1.0
15.	5, 8, 3, 5.8.5	EPA SRS	The system shall allow the user to enter the Fiscal Year for each planned full compliance evaluation.	ICIS-Air version 1.0
16.	5, 8, 3, 5.8.5	EPA SRS	The system shall allow the user to indicate whether each planned full compliance evaluation is On or Off Site.	ICIS-Air version 1.0
17.	5, 8, 3, 5.8.5	EPA SRS	The system shall allow the user to enter Comments for each planned full compliance evaluation.	ICIS-Air version 1.0
18.	5.8.6	EPA SRS	The system shall display a value of Overdue for the Current CMS Status data element if the Facility has not been evaluated within the CMS Effective Frequency indicated in the CMS record, according to the CMS calculation algorithm.	ICIS-Air version 1.0
19.	5.8.6	EPA SRS	The system shall run the process to generate the FY CMS Status based on historical CMS records against the Latest FCE Actual End Date on "Day Y" following the end of the fiscal year.	ICIS-Air version 1.0
20.	5.8.2, 5.8.6	EPA SRS	The system shall calculate the FY CMS Status with the historical CMS record for that fiscal year once it has been generated on "Day Y" against the historical CMS record and the Latest FCE Actual End Date of that fiscal year.	ICIS-Air version 1.0
21.	5.8.6	EPA SRS	The system shall run the process to update the Current CMS Status based on current CMS records (live data) against the Latest FCE Actual End Date when there is:	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• a new CMS record, • a change to the CMS record, • a change to the Latest FCE Actual End Date, • deletion of the Latest FCE, • creation of an FCE record with a more recent Actual End Date.	
22.	5.2.4	EPA SRS	The system shall display a warning message if the CMS Category does not match the Facility Classification on save.	ICIS-Air version 1.0
23.	N/A		The system shall enforce the security model for the users to view, add, edit, and delete a CMS. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
24.	5.2.4	EPA SRS	The system shall provide a message to the user if the user deletes a CMS that is Active notifying the user that the CMS is still active and the Current CMS Status.	ICIS-Air version 1.0
25.	5.8.2	EPA SRS	The system shall allow authorized users to set the "Day X" value for when to archive the historical CMS data elements and values.	ICIS-Air version 1.0

3.1.2.3   *Compliance Monitoring Strategy Data Requirements*

Table 3.1-9 lists the data element requirements that apply to Compliance Monitoring Strategy. This table includes the system, minimum data requirements, and possible future data elements.

Table 3.1-9. ICIS-Air Compliance Monitoring Strategy Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
1.	Y	Y	N	Y	N/A	N/A	CMS Identifier • Unique system-generated sequence ID
2.	Y	Y	N	N	5.8.1	PNME	Facility ID • Foreign Key of Linked Facility

3.	N	N	N	N	5.8.1	CMSS	CMS Start Date
							 • Date
							   – Batch: Must be valid date in yyyy-mm-dd format
							   – Web: Must be valid date in mm/dd/yyyy format
							 • Defaults to Current Date

4.	N	Y	Y	N	5.8.1	CMSC	CMS Category
							 • Must be validated against Ref Table.
							 • Valid Values:
							   – Title V Major (A)
							   – EPA Oversight for Non-Tribal Lands at Mega Sources (D)
							   – EPA Authority/Oversight for Tribal Lands at Major Source (E)
							   – EPA Oversight for Non-Tribal Lands at Major Sources (F)
							   – EPA Authority/Oversight for Tribal Lands at Mega Sources (G)

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
							– Mega-Site (M) – EPA Authority/Oversight for Tribal Lands at 80% Synthetic Minor Sources (N) – Other/Alternate Facilities (O) – 80% Synthetic Minor (S) – EPA Oversight for Non-Tribal Lands at Other/Alternative Sources (X) – EPA Oversight for Non-Tribal Lands at 80% Synthetic Minor Sources (Y) – EPA Authority/Oversight for Tribal Lands at All Other Sources (Z)
5.	N	Y	Y	N	5.8.1	CMSI	CMS Frequency • Non-Negative Integer • Valid Values: – 1 through 9 • Default based upon CMS Category entered
6.	N	N	N	N	N/A	N/A	Reason for Changing CMS • Alphanumeric (200) • Free-form text
7.	N	N	N	N	N/A	N/A	Active on CMS Plan • Alphanumeric (1) • Valid Values: – Y (Default) – N
8.	N	N	N	N	N/A	N/A	Date Removed from CMS Plan • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format • Defaults to Current Date when Active on CMS Plan is set to N
9.	N	Y	N	N	5.8.5	CMY	Planned Evaluation Fiscal Year • Numeric (yyyy)
10.	N	Y	N	N	5.8.5	CMO	Planned Evaluation On or Off-Site Evaluation • Valid Values: – On-Site (Default) – Off-Site
11.	N	N	N	N	5.8.1	CM19	Planned Evaluation Comments • Alphanumeric (500) • Free-form text
12.	N	N	N	Y	N/A	N/A	CMS Fiscal Year • Numeric (yyyy)
13.	N	N	N	Y	5.8.1	N/A	CMS Effective Frequency • Non-Negative Integer • System generated • Values based upon CMS Frequency or Default CMS Frequency if CMS Frequency is less than Default CMS

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
							Frequency
14.	N	N	N	Y	5.8.1	N/A	CMS Origination Date • Date • System generated
15.	N	N	N	Y	5.8.1	N/A	CMS Effective Date • Date • System generated
16.	N	N	N	Y	N/A	N/A	Next FCE Due Date • Date • System generated

17.	N	N	N	Y	5.8.6	N/A	CMS Status
							 • System generated
							 • Valid Values:
							   – Not Overdue
							   – Overdue

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.1.2.4 Compliance Monitoring Strategy Business Rule Requirements

Table 3.1-10 lists the business rules requirements that apply to Compliance Monitoring Strategy. This table includes the business rules for data elements and error handling.

Table 3.1-10. ICIS-Air Compliance Monitoring Strategy Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The system shall allow zero to one active CMS record to be associated with a Facility.	ICIS-Air version 1.0

2	5.8.1	The system shall provide a default CMS Frequency based on the following CMS Category:
		 • If CMS Category is A/E/F, default CMS Frequency is-
		   – 2 Federal Fiscal Years
		 • If CMS Category is D/G/M, default CMS Frequency is-
		   – 3 Federal Fiscal Years
		 • If CMS Category is N/S/Y, default CMS Frequency is-
		   – 5 Federal Fiscal Years
		 • If CMS Category is O/X/Z, default CMS Frequency is-
		   – Blank
			ICIS-Air version 1.0

3.	5.8.1	The system shall set the CMS Frequency to the default value if the user changes CMS Category without providing a new CMS Frequency value for an existing CMS record.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
4.	N/A	The system shall set the CMS Effective Frequency based on the following: • If CMS Category is A/E/F and CMS Frequency is less than 2 Years, CMS Effective Frequency is- – 2 Federal Fiscal Years • If CMS Category is D/G/M and CMS Frequency is less than 3 Years, CMS Effective Frequency is- – 3 Federal Fiscal Years • If CMS Category is N/S/Y and CMS Frequency is less than 5 Years, CMS Effective Frequency is- – 5 Federal Fiscal Years • If CMS Category and CMS Frequency do not meet any of the above, CMS Effective Frequency is- – CMS Frequency	ICIS-Air version 1.0
5.	5.8.1	The system shall default the CMS Origination Date to the CMS Start Date for new CMS records.	ICIS-Air version 1.0
6.	5.8.1	The system shall ensure that the CMS Start Date is less than or equal to the Current Date.	ICIS-Air version 1.0
7.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is A, E, F and the new value is A, E, F, D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
8.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is D and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
9.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is D and the new value of CMS Category is N, S, Y, O, X, Z.	ICIS-Air version 1.0
10.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is G and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
11.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is G and the new value of CMS Category is N, S, Y, O, X, Z.	ICIS-Air version 1.0
12.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is M and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
13.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is M and the new value of CMS Category is N, S, Y, O, X, Z.	ICIS-Air version 1.0
14.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is S and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
15.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is S and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
16.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is N and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
17.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is N and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
18.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is F and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
19.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is F and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
20.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is Y and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
21.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is Y and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
22.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is B and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
23.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is B and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
24.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is O and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
25.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is O and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
26.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is X and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
27.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is X and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0
28.	5.8.1	The system shall set the CMS Start Date to the Current Date if the current value of CMS Category is Z and the new value of CMS Category is A, E, F unless the user has provided a new CMS Start Date.	ICIS-Air version 1.0
29.	5.8.1	The system shall not change the CMS Start Date if the current value of CMS Category is Z and the new value of CMS Category is D, G, M, N, S, Y, O, X, Z.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
30.	5.8.1	The system shall set the CMS Effective Date to: • CMS Start Date if: – an FCE Actual End Date does not exist or – the latest FCE Actual End Date is less than or equal to CMS Start Date • Latest FCE Actual End Date if: – an FCE Actual End Date exists and – the latest FCE Actual End Date is greater than CMS Start Date	ICIS-Air version 1.0
31.	5.8.1	The system shall determine the Latest FCE Actual End Date for the current record by taking the most recent Actual End Date of all FCEs for that Facility.	ICIS-Air version 1.0
32.	5.8.1	The system shall determine the Latest FCE Actual End Date for a historical record by taking the latest FCE Actual End Date where the Actual End Date is less than or equal to September 30 of the historical record's fiscal year.	ICIS-Air version 1.0
33.	5.8.1	The system shall generate the Next FCE Due Date using the following calculation: CMS Effective Date + CMS Effective Frequency year, then round up to the last day of that fiscal year.	ICIS-Air version 1.0
34.	5.8.2	The system shall create a historical record for a fiscal year Day X following the end of the fiscal year with the following data elements: • Facility ID • CMS Origination Date • CMS Start Date • CMS Category • CMS Frequency • CMS Effective Frequency • Reason for Changing CMS • Active on CMS Plan • Date Removed from CMS Plan	ICIS-Air version 1.0
35.	5.8.2	The system shall copy the following CMS data elements and values on Day Y and append them to the fiscal year's record: • Latest FCE Actual End Date before Day X (October 1) • Compliance Monitoring Type • Agency	ICIS-Air version 1.0
36.	5.8.6	The system shall set the Current CMS Status to Overdue if the Current Date FY is greater than the Next FCE Due Date FY for current CMS data.	ICIS-Air version 1.0
37.	5.8.6	The system shall set the Current CMS Status to Not Overdue if the Current Date FY is less than or equal to the Next FCE Due Date FY for the current CMS data.	ICIS-Air version 1.0
38.	5.8.6	The system shall set the FY CMS Status to Overdue if the CMS FY is greater than or equal to the Next FCE Due Date FY for that record.	ICIS-Air version 1.0
39.	5.8.6	The system shall set the FY CMS Status to Not Overdue if the CMS FY is less than the Next FCE Due Date FY for that record.	ICIS-Air version 1.0
40.	5.8.5	The system shall ensure Planned Full Compliance Evaluation Fiscal Year is a valid year equal to or greater than the current year.	ICIS-Air version 1.0
41.	5.8.5	The system shall allow zero to one planned full compliance evaluation per fiscal year.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
42.	5.8.5	The system shall allow zero or many planned full compliance evaluations associated to one Facility.	ICIS-Air version 1.0
43.	N/A	The system shall map the CMS Categories to the following Facility Classification: • If Facility Classification is Major, CMS Category should be- – A, D, E, F, G, M • If Facility Classification is Synthetic Minor, CMS Category should be- – N, S, Y • If Facility Classification is Minor, CMS Category should be- – O, X, Z • If Facility Classification is Unknown, CMS Category should be- – O, X, Z • If Facility Classification is Blank, CMS Category should be- – Blank	ICIS-Air version 1.0
44.	5.2.4	The system shall save the CMS record but provide a warning message if the CMS Category does not match the Facility Classification.	ICIS-Air version 1.0
45.	N/A	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new CMS data.	ICIS-Air version 1.0
46.	EPA SME Meeting	The system shall write the entire current CMS record to an audit table every time the record is saved on edit and delete actions; the audit record will also include which user performed the action, the type of action (Update, Delete), and the date/time the action was performed.	ICIS-Air version 1.0
47.	N/A	The system shall generate the following data and archive as historical CMS data on Day Y following the end of the fiscal year: • CMS Effective Date • Next FCE Due Date	ICIS-Air version 1.0
48.	N/A	The system shall generate the FY CMS Status on Day Y following the end of the fiscal year.	ICIS-Air version 1.0
49.	N/A	The system shall create a historical record for a fiscal year on Day Y following the end of the fiscal year if the active CMS record has been updated since September 30 of that year and the CMS Start Date is before October 1 of that year with the following data elements and overwrite the same previously archived CMS record: • Facility ID • CMS Origination Date • CMS Start Date • CMS Category • CMS Frequency • CMS Effective Frequency • Reason for Changing CMS • Active on CMS Plan • Date Removed from CMS Plan	ICIS-Air version 1.0

3.1.2.5   Add Compliance Monitoring Strategy Plan Record

Pursuant to the Compliance Monitoring Strategy, a CMS Plan provides a list of Facilities to be evaluated along with the negotiated evaluation frequency. Once a new CMS record is saved for a Facility, it will trigger ICIS-Air to automatically generate the CMS Effective Date, CMS

Effective Frequency, and Next FCE Due Date. Additionally, background processing will run to generate the CMS Status, refer to Section 3.1.2.8 for additional information. To add a CMS record, users must select a CMS Category to determine the CMS Frequency for an evaluation.

A current CMS record is uniquely identified by the following key data elements:

- Facility ID

The following data elements contain default values:

- CMS Frequency
  The CMS Frequency value, a required data element, can be viewed or entered by users with the Enforcement Sensitive role. If the CMS Frequency is not entered, ICIS-Air will set the CMS Frequency to a default value based on the selected CMS Category once the record is saved. If a default value does not exist, the user must provide the CMS Frequency. Users with the Enforcement Sensitive role can change the CMS Frequency value.

After the CMS record is saved, ICIS-Air will generate the CMS Origination Date based on the CMS Start Date and the CMS Effective Date will be set to the CMS Start Date if the Latest FCE Actual End Date does not exist or if the CMS Start Date is greater than or equal to the Latest FCE Actual End Date, if it exists. ICIS-Air will determine the CMS Effective Frequency and Next FCE Due Date at this time. Additionally, background processing will run and update the CMS Status for the newly created CMS record. For additional details, refer to 3.1.2.8 Background Processing – Generate CMS Data and Section 3.1.2.9 Background Processing – Generate CMS Status.

Batch

Batch users will have an Add CMS transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements and business rules sections for more details on rejecting CMS add transactions.

Figure 3.1-19 illustrates the processing required for adding a CMS to ICIS-Air through a batch transaction.

Figure 3.1-19. Use Case: Add Compliance Monitoring Strategy—Batch
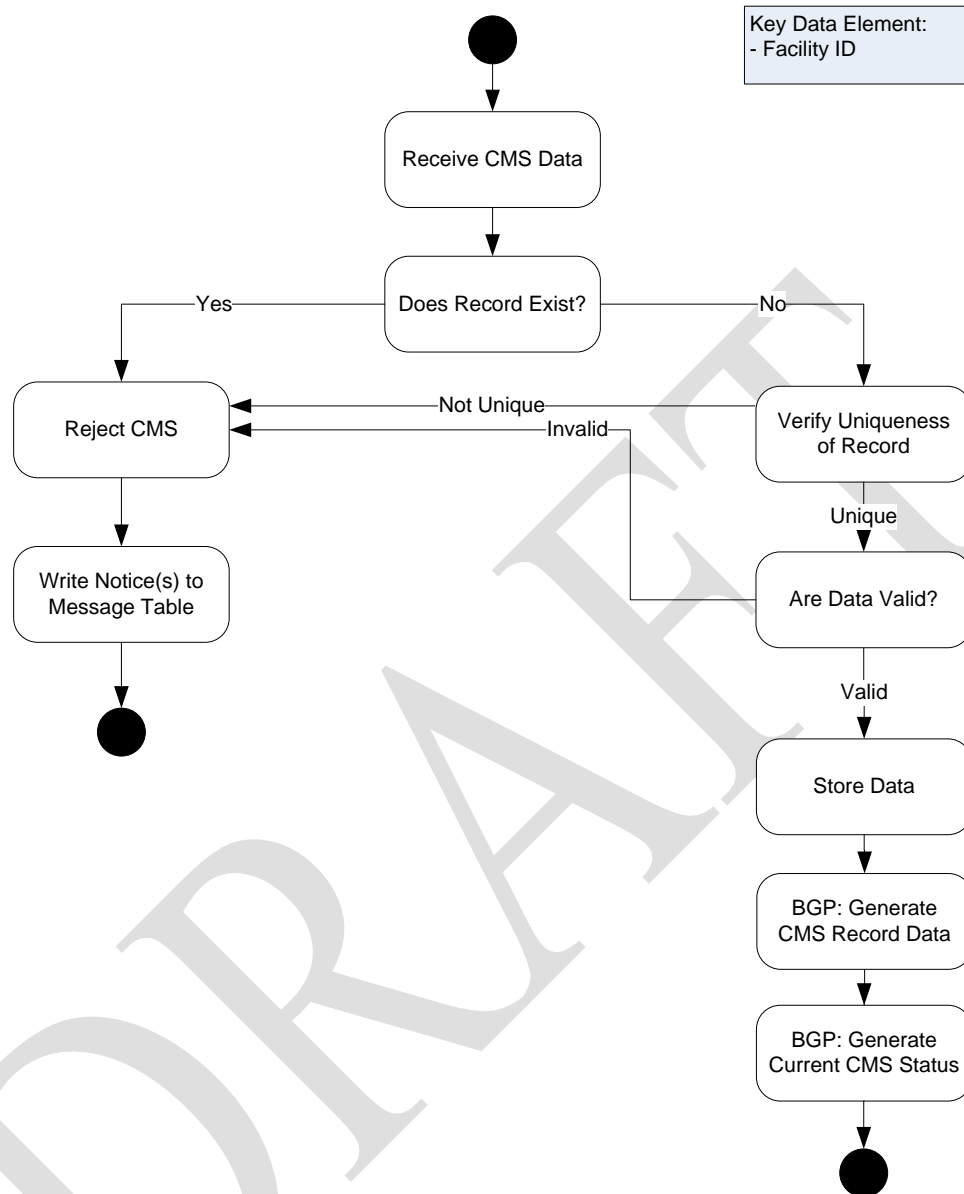
Key Data Element:
- Facility ID

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.

Users may add a new CMS record by clicking on the CMS link from the Facility screen and clicking the Add CMS link.

Figure 3.1-20 illustrates the processing required for adding a Compliance Monitoring Strategy plan record in ICIS-Air online.
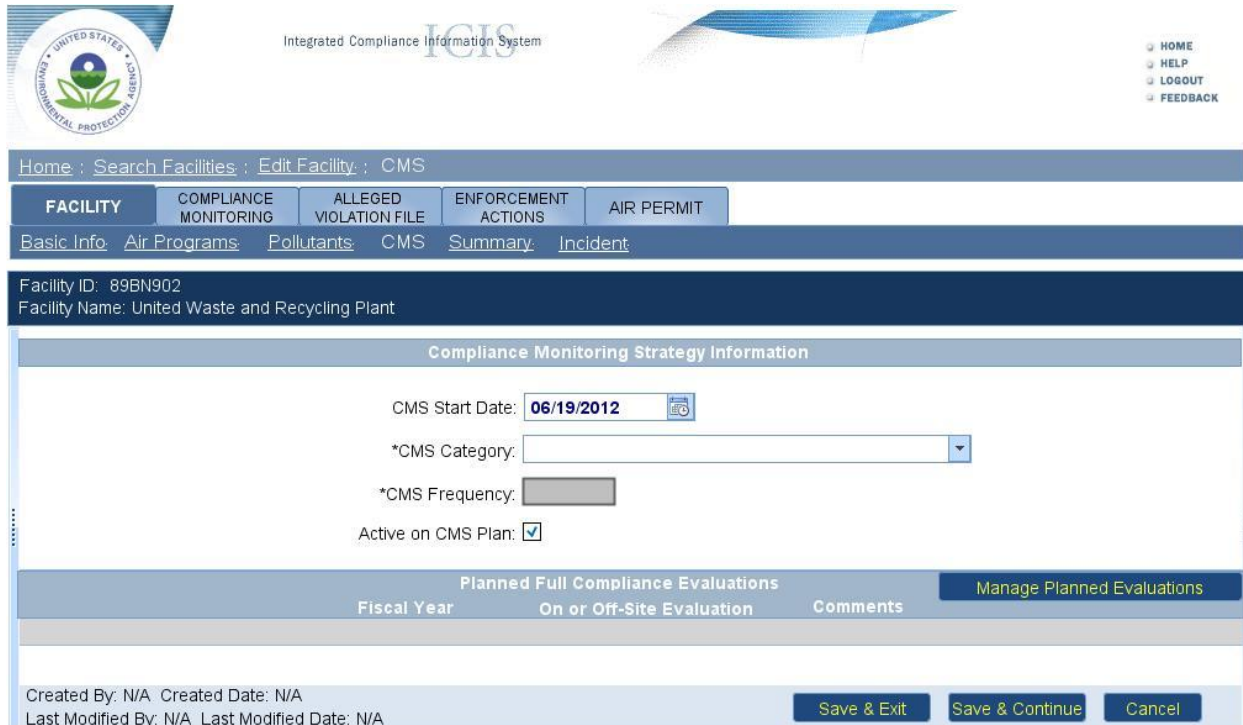
Figure 3.1-20. Use Case: Add Compliance Monitoring Strategy—Web
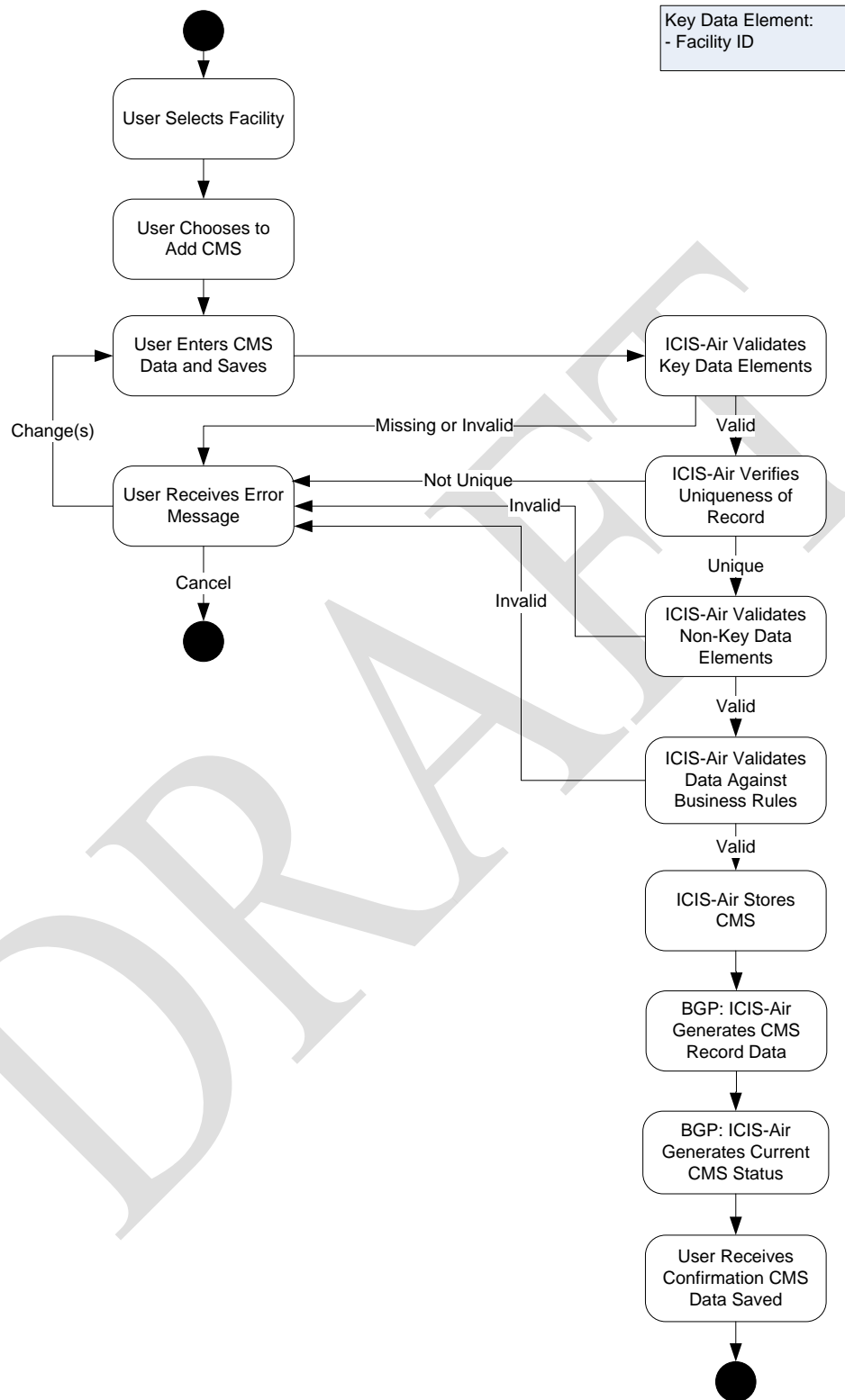
Users must have the Add CMS privileges to add a CMS to a Facility.

Figure 3.1-21 shows the Add Compliance Monitoring Strategy notional screen.

Figure 3.1-21. Notional Screen: Add Compliance Monitoring Strategy

Note: Data for CMS Frequency and Planned Full Compliance Evaluations are Enforcement Sensitive.

3.1.2.6   Edit Compliance Monitoring Strategy Plan Record

Users can edit a Compliance Monitoring Strategy Plan within the current view of the CMS record. Users will be able to edit any CMS data elements on this screen except for key data elements, system generated values, data from another functional module that are display only on the CMS screen, or any values on the View Historical CMS Information Screen.

The following data elements are key data elements that uniquely identify a CMS record and cannot be edited through the Edit Compliance Monitoring Strategy transaction:

- Facility ID.

The following data elements are generated by the system and cannot be edited through the Edit Compliance Monitoring Strategy transaction:

- Origination Date
- CMS Effective Date
- CMS Effective Frequency
- Next FCE Due Date
- CMS Status.

The following data elements are FCE data elements that are display only on the Edit CMS screen:

- Latest FCE Actual End Date
- Compliance Monitoring Type
- Agency.

The following data elements can be viewed or entered only by users with the Enforcement Sensitive role:

- CMS Effective Date
- CMS Frequency
- CMS Effective Frequency
- Next FCE Due Date
- Current CMS Status
- Planned Full Compliance Evaluations Fiscal Year
- Planned Full Compliance Evaluations On or Off-Site Evaluation
- Planned Full Compliance Evaluations Comments.

If users change the CMS Category or CMS Frequency values while editing the CMS record, it can affect the dates used in calculating the Next FCE Due Date, which may result in an update of the CMS Status.

- **CMS Category**

  Changing the CMS Category from a lower category to a Major category will update the CMS Frequency value to a default CMS Frequency that corresponds to the new CMS Category. Additionally, a new CMS Category value can trigger a change in the CMS Start Date, setting it to the Current Date once the record is saved, unless the user has provided a new CMS Start Date. Users can document the reasons for changing the CMS Category or Frequency.

- **CMS Frequency**

  Users without the Enforcement Sensitive role can change the CMS Category without entering a value for CMS Frequency. If users change the CMS Category from a lower category to a Major without changing the CMS Frequency, ICIS-Air will set the CMS Frequency to the default value that corresponds to the selected CMS Category once the record is saved. Users with the Enforcement Sensitive role can change the default CMS Frequency value.

After the CMS record is edited and saved, ICIS-Air will generate the following data:

- **CMS Start Date**

  The CMS Start Date can change based on the new CMS Category value or user edits. Once the record is saved, ICIS-Air will set the CMS Start Date to the Current Date depending on the new value for CMS Category, unless the user provided a new CMS Start Date. The rules on whether the CMS Start Date is affected are detailed in the table below.

Table 3.1-11. CMS Start Date Change

Current Value CMS Category	New Value CMS Category	Effect on CMS Start Date
Blank	A, E, F	Change to a new CMS Start Date or Current Date, if new CMS Start Date is not provided
A, E, F	A, E, F, D, G, M, N, S, Y, O, X, Z	Do nothing
D, G, M	A, E, F	Change to a new CMS Start Date or Current Date, if new CMS Start Date is not provided
D, G, M	D, G, M, N, S, Y, O, X, Z	Do nothing

Current Value CMS Category	New Value CMS Category	Effect on CMS Start Date
N, S, Y	A, E, F	Change to a new CMS Start Date or Current Date, if new CMS Start Date is not provided
N, S, Y	D, G, M, N, S, Y, O, X, Z	Do nothing
O, X, Z	A, E, F	Change to a new CMS Start Date or Current Date, if new CMS Start Date is not provided
O, X, Z	D, G, M, N, S, Y, O, X, Z	Do nothing

- **CMS Effective Date**

  The CMS Effective Date will be set to the CMS Start Date if the CMS Start Date is changed and CMS Start Date is greater than or equal to the Latest FCE Actual End Date.

- **CMS Effective Frequency**

  The CMS Effective Frequency will be set to the default CMS Frequency for the selected CMS Category if the CMS Frequency is less than the default CMS Frequency; if the CMS Frequency is greater than or equal to the default CMS Frequency, then the CMS Effective Frequency will be set to the CMS Frequency.

- **Next FCE Due Date**

  ICIS-Air will re-calculate the Next FCE Due Date if the CMS Effective Date and/or Frequency was changed.

- **CMS Status**

  Background processing will run and update the CMS Status after the CMS record has been saved. For additional details, refer to 3.1.2.8 Background Processing – Generate CMS Data and Section 3.1.2.9 Background Processing – Generate CMS Status.

Batch

Batch users will have an Edit Compliance Monitoring Strategy transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.1.2.3 and business rules in Section 3.1.2.4 for more details on rejecting Compliance Monitoring Strategy edit transactions.

Figure 3.1-22 illustrates the processing required for editing a Compliance Monitoring Strategy in ICIS-Air through a batch transaction.

Figure 3.1-22. Use Case: Edit Compliance Monitoring Strategy—Batch
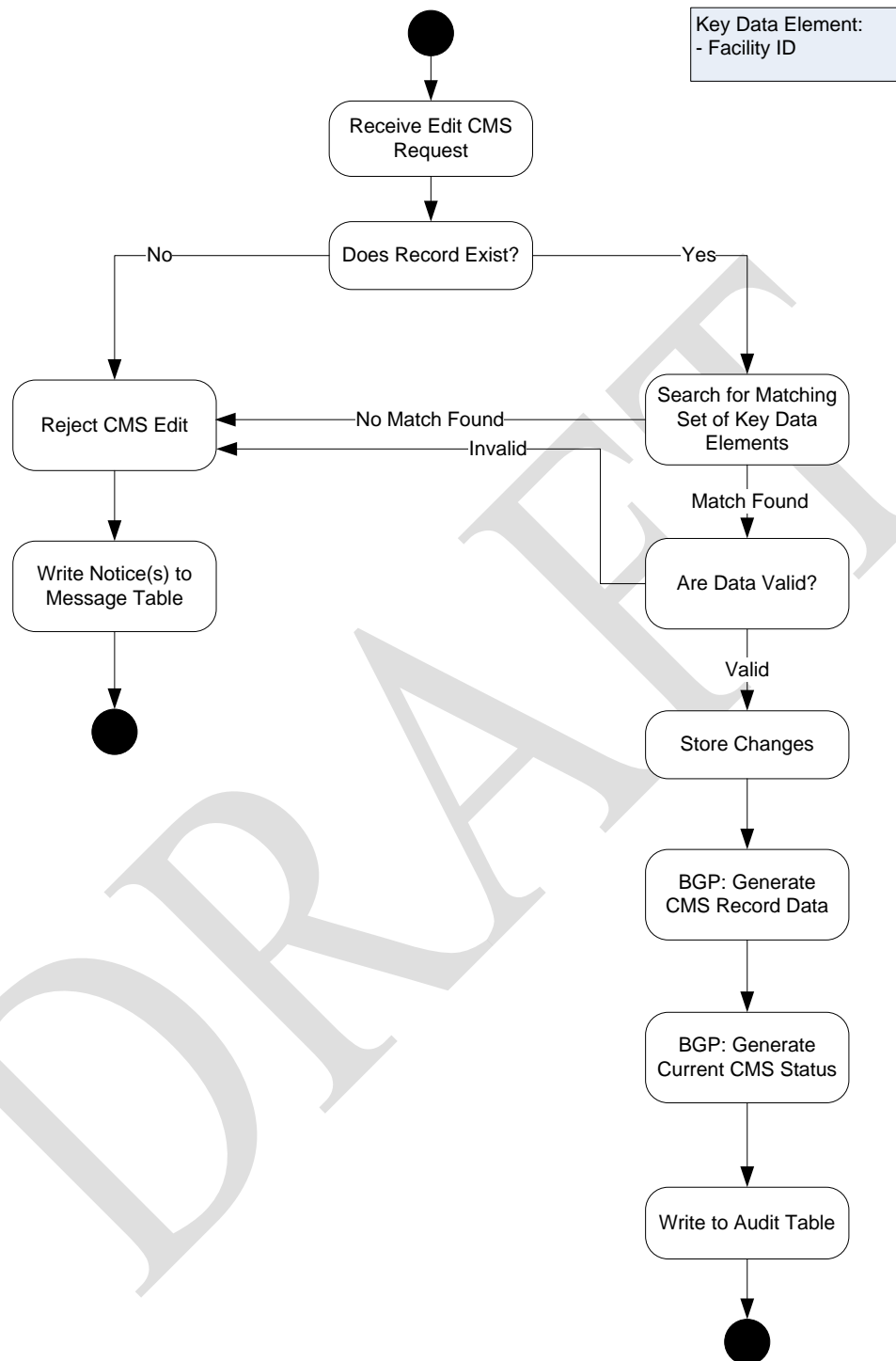
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.1.2.3, Compliance Monitoring Strategy Data Elements, and Section 3.1.2.4, Compliance Monitoring Strategy Business Rules, for more details.

Users may edit a CMS by clicking on the CMS link from the Facility screen and selecting the active CMS.

Figure 3.1-23 illustrates the processing required for editing a Compliance Monitoring Strategy in ICIS-Air online.

Figure 3.1-23. Use Case: Edit Compliance Monitoring Strategy—Web
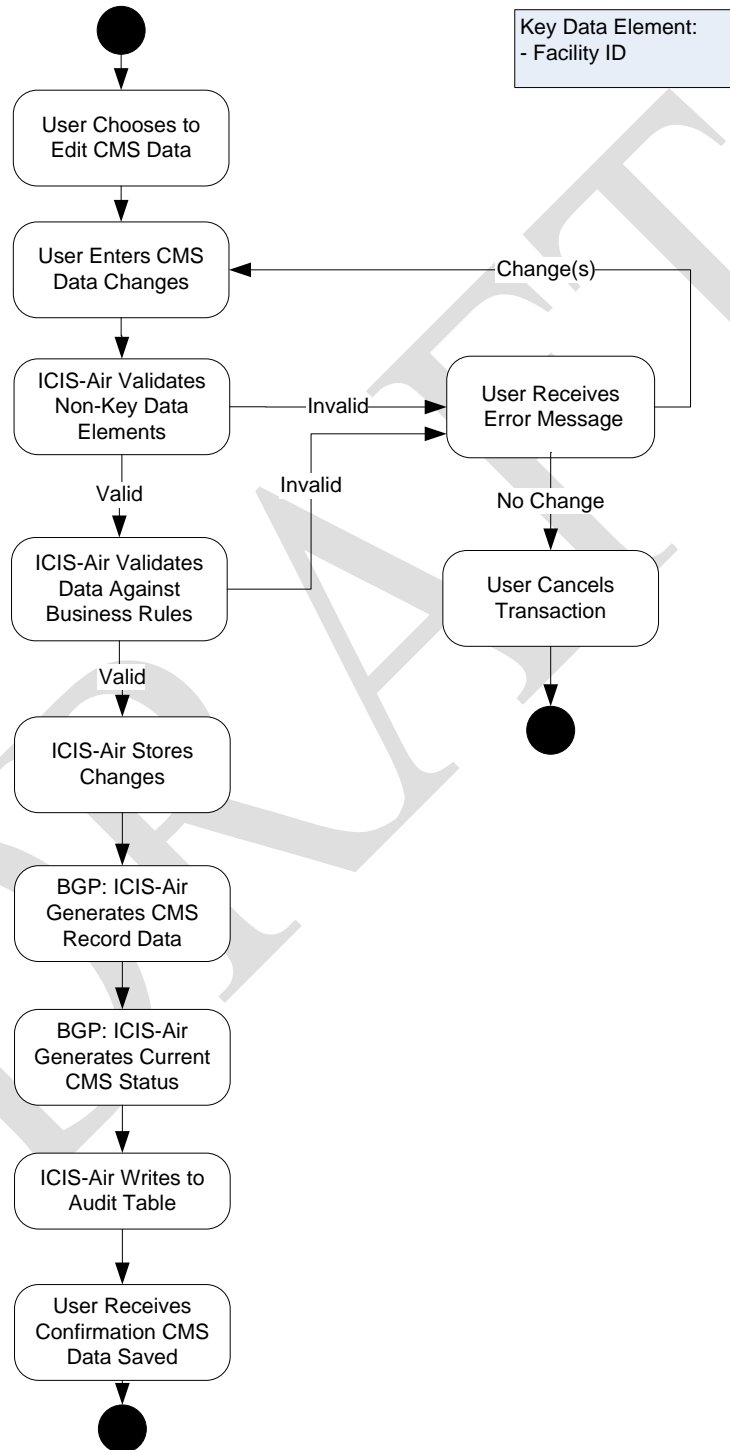
Users must have the Edit CMS privileges to edit an existing CMS record, and only users with the Enforcement Sensitive role may view or edit the CMS Effective Date, CMS Frequency, CMS Effective Frequency, Next FCE Due Date, Current CMS Status, and Planned Full Compliance Evaluations data.

Figure 3.1-24 shows the Edit Compliance Monitoring Strategy notional screen.

Figure 3.1-24. Notional Screen: Edit Compliance Monitoring Strategy

Note: Data for CMS Effective Date, CMS Frequency, CMS Effective Frequency, Next FCE Due Date, Current CMS Status, and Planned Full Compliance Evaluations are Enforcement Sensitive.

Users with Enforcement Sensitive privileges can click the Manage Planned Evaluations button from the Edit Compliance Monitoring Screen to add, edit, or delete planned full compliance evaluations. Figure 3.1-25 shows the List Planned Full Compliance Evaluations notional screen.

Figure 3.1-25. Notional Screen: List of Planned Full Compliance Evaluations

Users can view, add, edit or delete planned full compliance evaluations from the Planned Full Compliance Evaluations Screen. Figure 3.1-26 shows the Edit Planned Full Compliance Evaluations notional screen.

Figure 3.1-26. Notional Screen: Edit Planned Full Compliance Evaluations

From the Edit CMS screen, users can click on the View Historical CMS Information button for previous fiscal years' CMS data. Figure 3.1-27 displays the View Historical CMS Information notional screen.

Figure 3.1-27. Notional Screen: View Historical CMS Information

Note: Data for FY CMS Status, CMS Frequency, CMS Effective Date, CMS Effective Frequency, and Next FCE Due Date are Enforcement Sensitive.

3.1.2.7   Delete Compliance Monitoring Strategy Plan Record

Users must have the Delete CMS privileges to remove an existing CMS record from a Facility.

When users delete a Compliance Monitoring Strategy record, all associated planned full compliance evaluations and the CMS status will be deleted for that Compliance Monitoring Strategy plan. The historical CMS data and records in the audit table will not be deleted.

Batch

Batch users will have Delete Compliance Monitoring Strategy transactions rejected if the record does not exist for the Facility, the business rules are violated, or if they have insufficient privileges.

Figure 3.1-28 illustrates the processing required for deleting a Compliance Monitoring Strategy from ICIS-Air through a batch transaction.

Figure 3.1-28. Use Case: Delete Compliance Monitoring Strategy—Batch
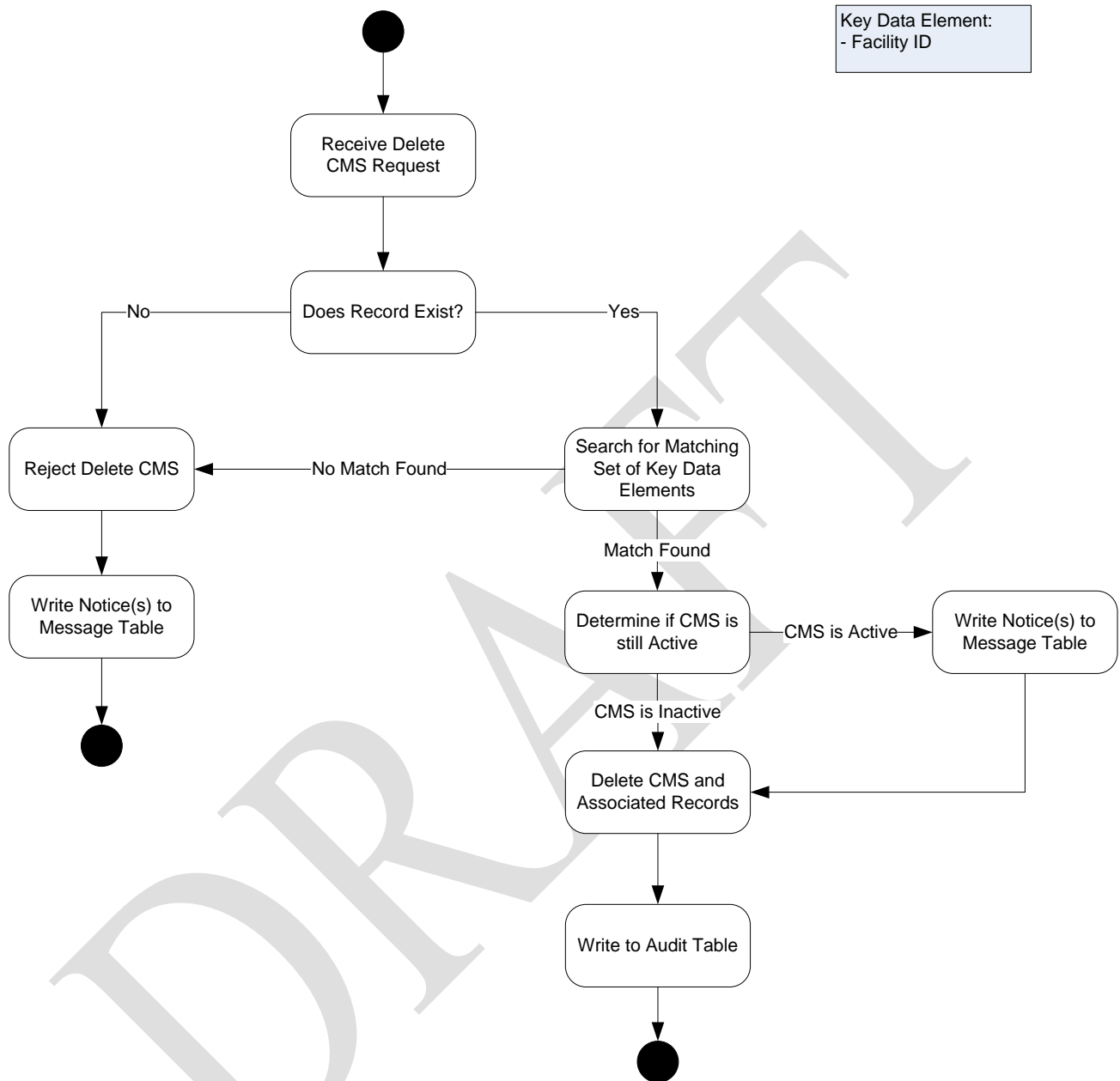
Web

Web users will receive an error message if the record does not exist or the business rules are violated. Users will receive a warning message if the CMS record is still active on the CMS Plan or CMS Status contains an overdue status, but users can choose to continue with the deletion.

Figure 3.1-29 illustrates the processing required for deleting a Compliance Monitoring Strategy from ICIS-Air online.

Figure 3.1-29. Use Case: Delete Compliance Monitoring Strategy—Web
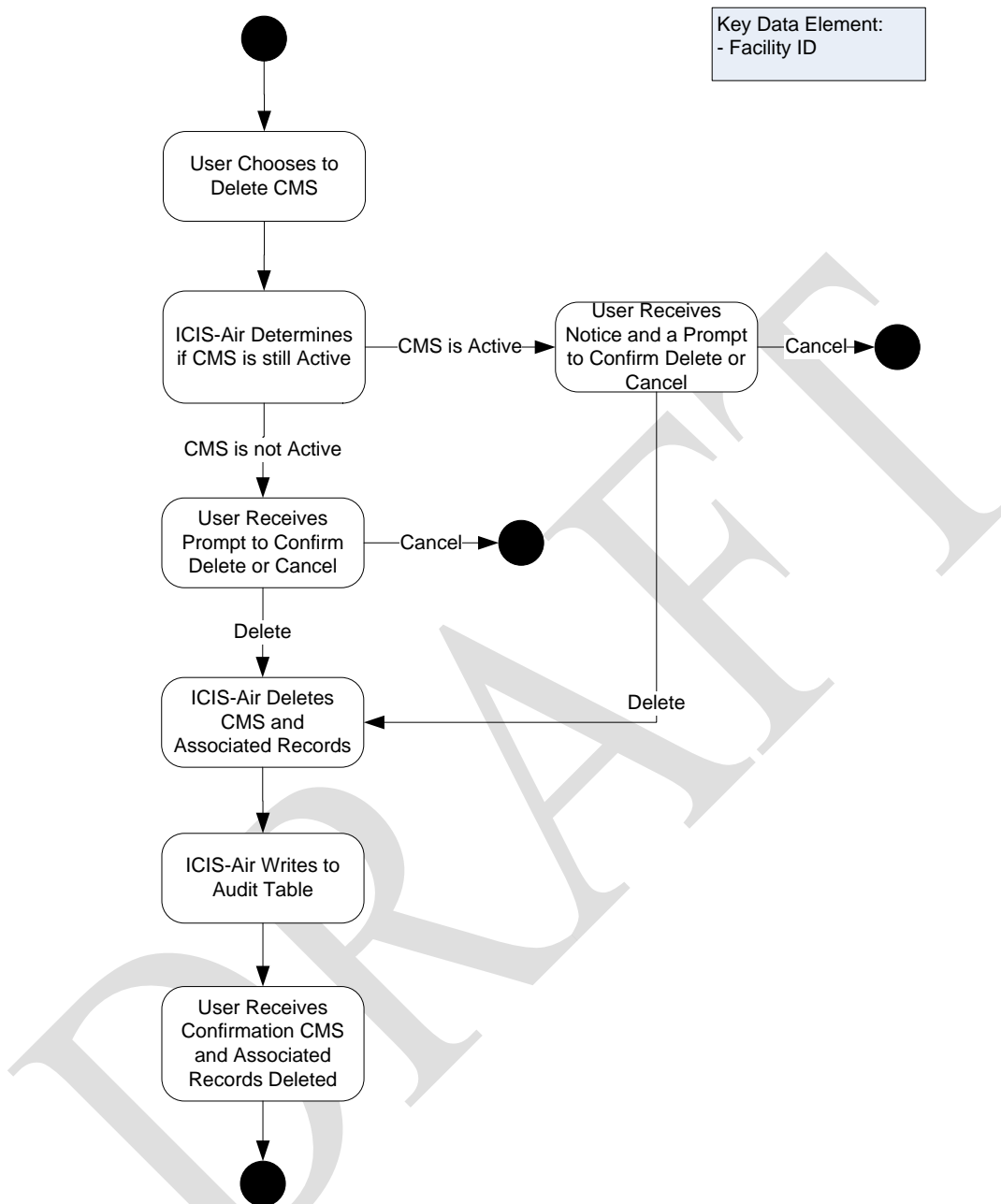
3.1.2.8   Background Processing – Generate CMS Data

ICIS-Air generates data that feed into the CMS Status algorithm. The dates are:

- **CMS Origination Date**

  The original start date of the CMS, defaults to the first CMS Start Date when the CMS record is added.

- **CMS Effective Date**

The Latest FCE Actual End Date or CMS Start Date if Latest FCE Actual End Date does not exist, or if the CMS Start Date is greater than or equal to the Latest FCE Actual End Date.

- **CMS Effective Frequency**

  The CMS Effective Frequency will be set to the default CMS Frequency for the selected CMS Category if the CMS Frequency is less than the default CMS Frequency, if the CMS Frequency is greater than or equal to the default CMS Frequency, then the CMS Effective Frequency is the CMS Frequency.

- **Next FCE Due Date**

  The algorithm is the last day of FY (CMS Effective Date + CMS Effective Frequency).

Figure 3.1-30 is a diagram depicting the generation of the CMS dates that feed into the algorithm for generating the CMS Status.

Figure 3.1-30. Generate CMS Record Data
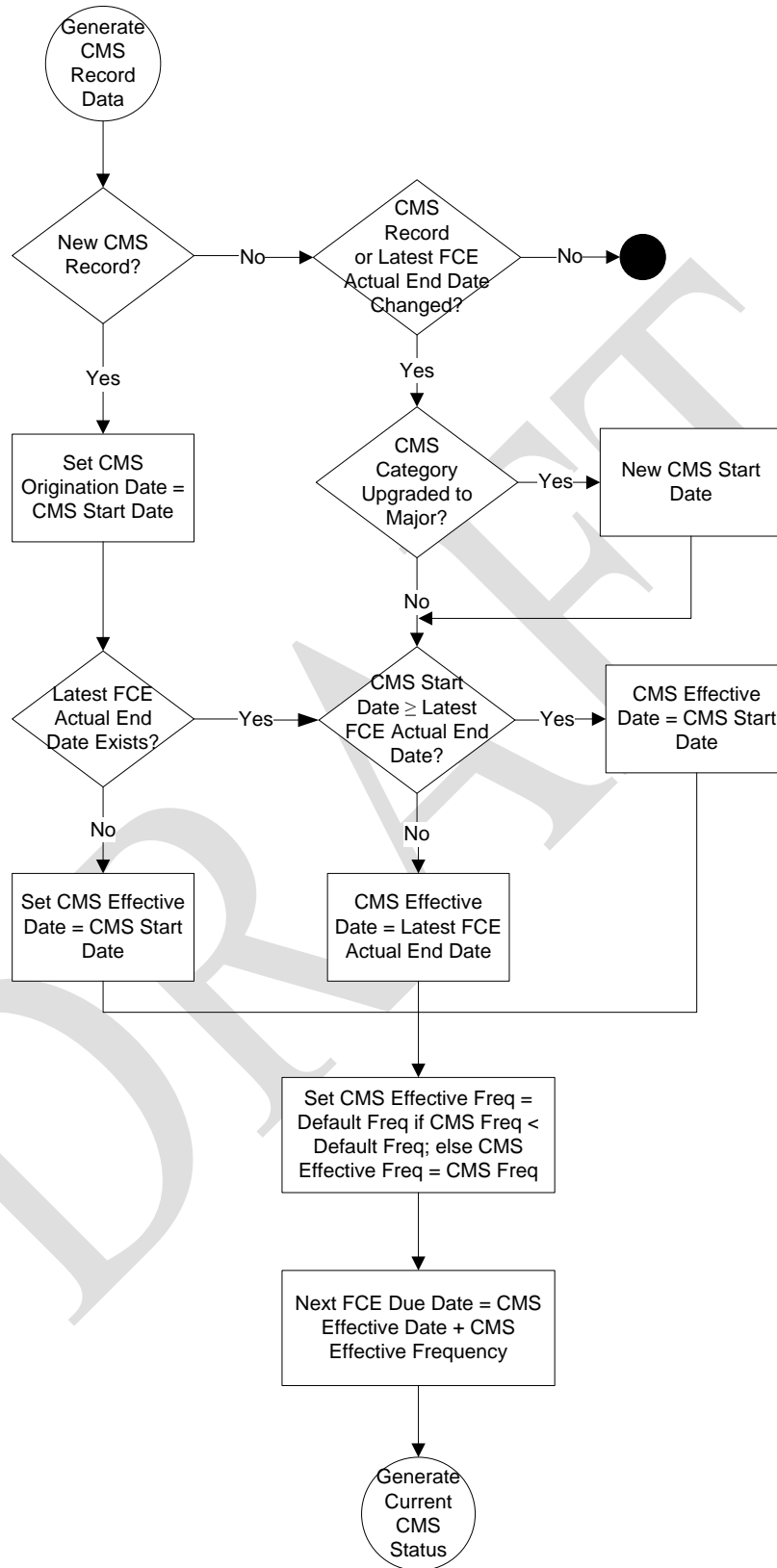
3.1.2.9   Background Processing – Generate CMS Status

After the CMS record is established for a Facility, ICIS-Air will use the data to assess whether the Facility has been evaluated within the negotiated CMS Frequency. Once it is determined that the Facility's FCE is past due, the CMS Status will display "Overdue" as the status. There are two separate background processes to generate and update the CMS Status: 1) generate CMS Status on Current CMS data, and 2) generate CMS Status on Historical CMS data. Details on the two background processes are provided below.

3.1.2.9.1   Generate CMS Status on Current CMS Data

ICIS-Air will run the background process to update the CMS Status in real time against the current live data when there is a new CMS record, a change to the CMS record, or a change to the Latest FCE Actual End Date (e.g., through the addition, update, or deletion of an FCE record). In addition, the process will run on a scheduled basis on Day Y, current December 1. ICIS-Air will change the Overdue status to Not Overdue when the Regulatory Agency has completed an FCE at the Facility and will generate the Overdue status when a Facility has received its FCE by the Next FCE Due Date[6].

The algorithm used to determine the CMS Status for current CMS data and Latest FCE Actual End Date is:

> Is Current Date FY greater than Next FCE Date FY?
>   If yes, CMS Status = Overdue.
>   If no, CMS Status = Not Overdue.

Figure 3.1-31 is a diagram depicting the generation of the CMS Status against current CMS data through data update. Figure 3.1-32 depicts the generation of the CMS Status against current CMS data through a scheduled run. Also included in this section are sample scenarios.

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[6] Note that the changes made on update can only set the current CMS Status to Overdue if the latest FCE Due Date is updated to be in a previous FY (e.g., through deletion of an FCE).

Figure 3.1-31. Generate Current CMS Status through Data Update
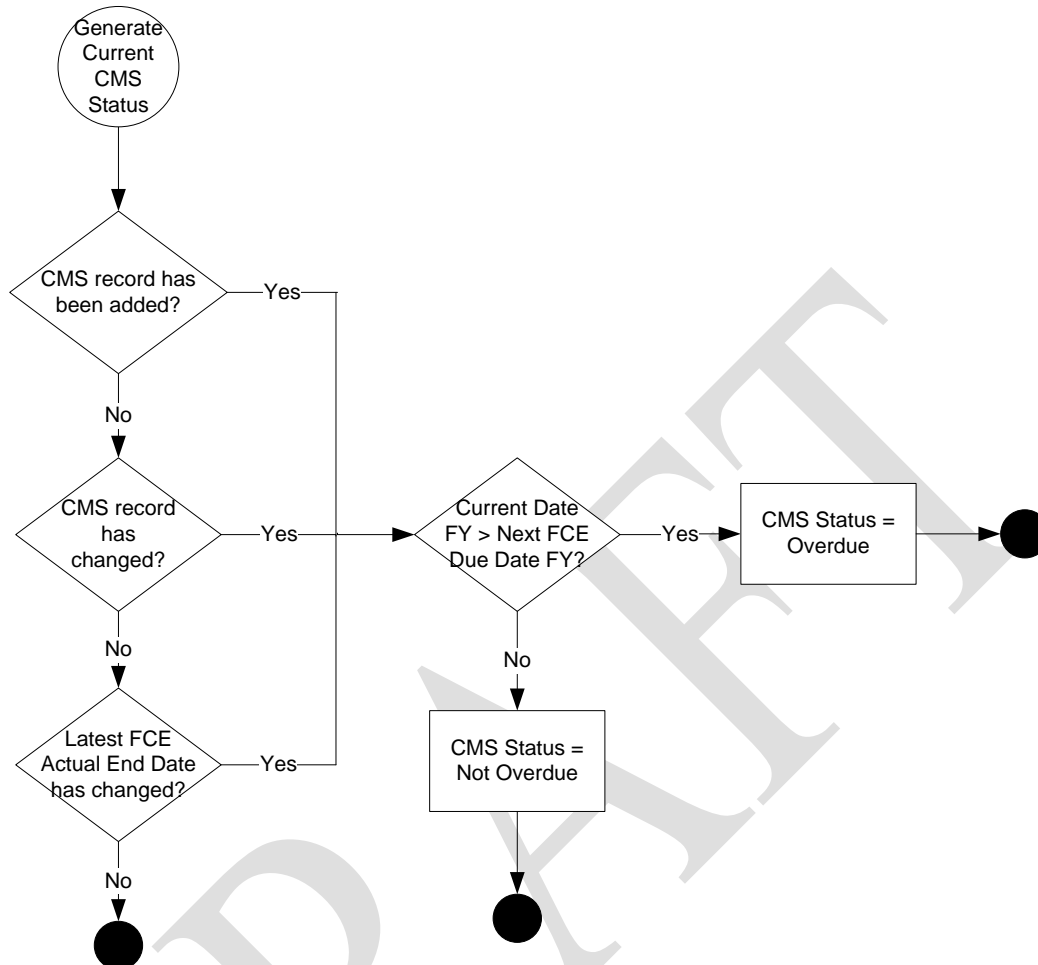
The process to generate the Current CMS Status also will occur on a scheduled basis to find all the Facilities who have not received an FCE per plan 60 days after the end of the previous fiscal year, Day Y, for example December 1. In Figure 3.1-32, the process is kicked off on a defined scheduled date, e.g. December 1, ICIS-Air will first search for all facilities that have an active CMS where the Current Date FY is > Next FCE Due Date FY. Any facilities found will be set to Overdue for the Current CMS Status.

Figure 3.1-32. Generate Current CMS Status on Scheduled Basis
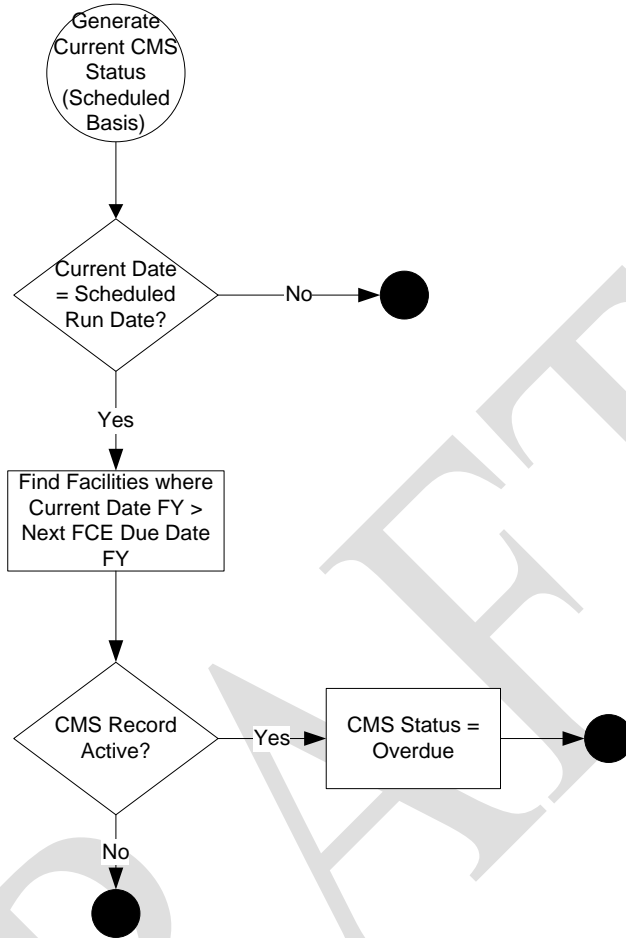
Examples of possible scenarios are demonstrated with sample data below. In the examples below, system generated data are indicated with blue column headers.

Example 1

Example 1 demonstrates that a new CMS record has been created on 2/1/2011, which triggered the background process to update the CMS Status and set the status to Not Overdue.

CMS Origination Date: 2/1/2011
CMS Category: Title V Major (A)
CMS Frequency: 2 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	Current CMS Status
A - 2 yrs.*	2/1/2011 (2011)	2/1/2011 (2011)	N/A	2/1/2011 (2011)	9/30/2013 (2013)	Not Overdue

Example 2

Example 2 demonstrates that the Latest FCE Actual End Date has changed on 3/1/2004, which triggered the background process to update the CMS Status. The CMS Status is Not Overdue since the FCE was completed by the Next FCE Due Date.

CMS Origination Date: 2/1/2002
CMS Category: Title V Major (A)
CMS Frequency: 2 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	Current CMS Status
A - 2 yrs.	3/1/2004 (2004)	2/1/2002 (2002)	2/25/2004 (2004)	2/25/2004 (2004)	9/30/2006 (2006)	Not Overdue

Example 3

Example 3 demonstrates that the Facility did not receive its FCE by the Next FCE Due Date. The first row displays the current date as October 1, 2004, so the current CMS Status remains Not Overdue since the background processing will not run until December 1. The second row displays the current date as December 1, 2004 and the current CMS Status is Overdue since the background processing ran on December 1, 2004 and the Facility has not received its FCE.

CMS Origination Date: 2/1/2002
CMS Category: Title V Major (A)
CMS Frequency: 2 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	Current CMS Status
A - 2 yrs.	10/1/2004 (2005)	2/1/2002 (2002)	N/A	2/1/2002 (2002)	9/30/2004 (2004)	Not Overdue
A - 2 yrs.	12/1/2004 (2005)	2/1/2002 (2002)	N/A	2/1/2002 (2002)	9/30/2004 (2004)	Overdue

Example 4

Example 4 demonstrates that the existing CMS record was changed on 8/1/2004, which triggered the background process to update the CMS Status. The CMS Category changed from A to M, which does not affect the CMS Start Date but prompts a new CMS Frequency, which changes the Next FCE Due Date. The CMS Status remains Not Overdue. In the table below, data that changed are highlighted in yellow.

CMS Origination Date: 2/1/2002
CMS Category:
         2/1/2002 - Title V Major (A)
         8/1/2004 - Mega-Site (A)
CMS Frequency:
         2/1/2002 - 2 Federal Fiscal Years
         8/1/2004 - 3 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	Current CMS Status
A - 2 yrs.*	7/31/2004 (2004)	2/1/2002 (2002)	N/A	2/1/2002 (2002)	9/30/2004 (2004)	Not Overdue
M - 3 yrs.	8/1/2004 (2004)	2/1/2002 (2002)	N/A	2/1/2002 (2002)	9/30/2005 (2005)	Not Overdue

*This row is displayed to demonstrate the original CMS Category/Frequency before it was changed to the new CMS Category/Frequency. ICIS-Air will store the latest CMS data and store the old CMS data in the audit tables.

Example 5

Example 5 demonstrates that the Facility's CMS Category was classified as A and it did not receive its FCE by the Next FCE Due Date, therefore the CMS Status was Overdue at the time the process ran on 3/14/2008. When the user updated the CMS Frequency from 2 to 3 on 3/15/2008 and also updated the CMS Start Date, it prompted a new Next FCE Due Date which changed the Current CMS Status from Overdue to Not Overdue. In the table below, data that changed are highlighted in yellow.

CMS Origination Date: 2/1/2002
CMS Category:
      2/1/2002 - Title V Major (A)
CMS Frequency:
      2/1/2002 - 2 Federal Fiscal Years
      3/15/2008 - 3 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	Current CMS Status
A - 2 yrs.*	3/14/2011 (2011)	2/1/2002 (2002)	6/20/2008	2/1/2002 (2002)	9/30/2010 (2010)	Overdue
A - 3 yrs.	3/15/2011 (2011)	10/1/2010 (2011)	6/20/2008	10/1/2010 (2011)	9/30/2014 (2014)	Not Overdue

*This row is displayed to demonstrate the original CMS Category/Frequency before it was changed to the new CMS Category/Frequency. ICIS-Air will store the latest CMS data and store the old CMS data in the audit tables.

3.1.2.10 Generate CMS Status on Historical CMS Data

ICIS-Air will have two processes to archive the historical CMS data used to calculate the historic FY CMS Status for each fiscal year. During the first process, ICIS-Air will archive the current CMS data one day after the end of the fiscal year, Day X, currently set to October 1, of each year. The System Administrator will have the option to configure the "Day X" value. The following data elements will be archived:

- Facility ID
- CMS Fiscal Year
- CMS Category
- CMS Frequency
- CMS Effective Frequency
- Reason for Changing CMS

- CMS Origination Date
- CMS Start Date
- Active on CMS Plan
- Date Removed from CMS Plan.

Figure 3.1-33 depicts archiving each fiscal year's historical CMS data. Historical CMS information will be readily available for reporting and analysis on a specific fiscal year in the state that it was in as of October 1 of each year.

Figure 3.1-33. Archive Historical CMS Data on Day X (October 1)
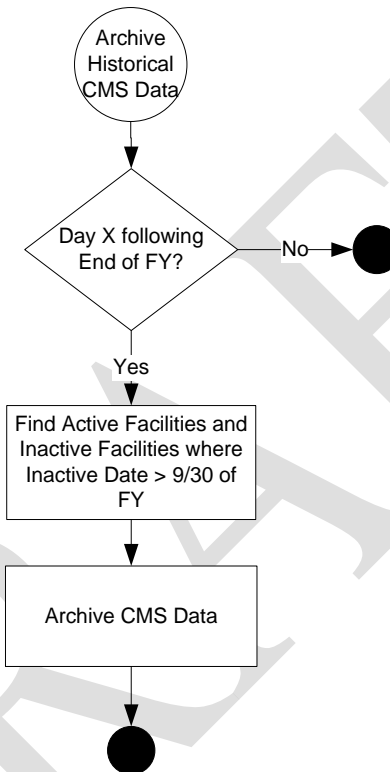
ICIS-Air will re-run the first archive process on Day Y, currently set to December 1, to archive the CMS data if there are changes made to the data with CMS Start Date before Day X, currently set to October 1. The following data elements will be archived:

- CMS Fiscal Year
- CMS Category
- CMS Frequency
- CMS Effective Frequency
- Reason for Changing CMS
- CMS Origination Date
- CMS Start Date
- Active on CMS Plan
- Date Removed from CMS Plan.

ICIS-Air will run the second archive process on Day Y, December 1, following the same fiscal year to update records where a Latest FCE Actual End Date for the facility less than or equal to 9/30 of that year exists and populate the historical CMS data with the following data:

- Latest FCE Actual End Date (before 10/1)
- Compliance Monitoring Type
- Agency.

After archiving the Latest FCE data, the process will generate the following data and archive as historical CMS data:

- CMS Effective Date
- Next FCE Due Date.

Next, the FY CMS Status will be generated based on the fiscal year's archived historical CMS data and the Latest FCE Actual End Date data. Currently, Day Y is defaulted to 60 days following the end of the fiscal year or December 1st. The System Administrator will have the option to configure the "Day Y" value.

The algorithm below will be used to determine the FY CMS Status:

> Is CMS FY $\geq$ Next FCE Due FY?
> > If yes, FY CMS Status = Overdue
> > If no, FY CMS Status = Not Overdue

Figure 3.1-34 is a diagram depicting the background processing that will take place on December 1 of each year, which will include archiving FCE data and generation of the CMS Effective Date, Next FCE Due Date, and FY CMS Status against historical CMS data. Also included in this section are sample scenarios.

Figure 3.1-34. Generate FY CMS Status on Historical CMS Data
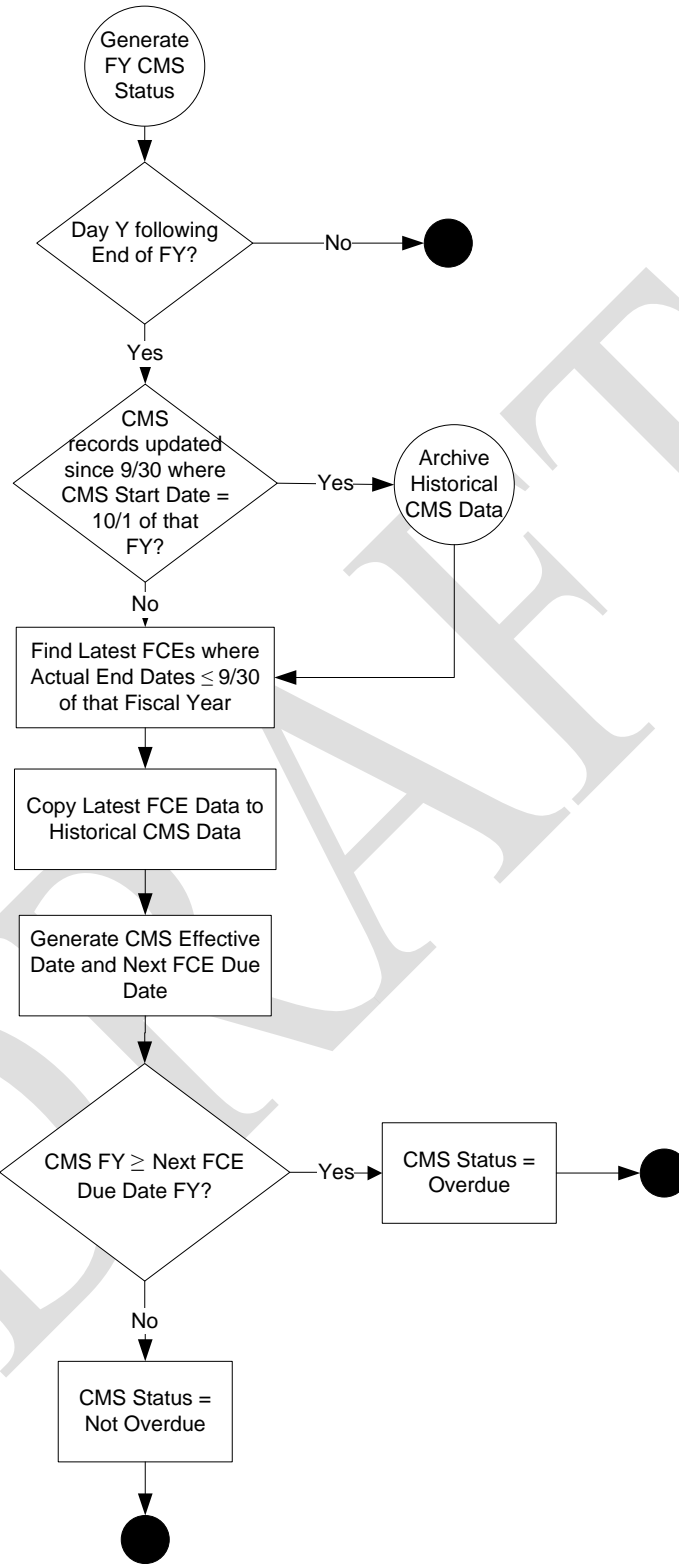
Examples of possible scenarios are demonstrated with sample data below.

Example 1

Example 1 demonstrates that the CMS record was created within the same fiscal year as the historical data fiscal year, therefore the FY CMS Status is Not Overdue.

CMS Origination Date: 2/1/2008
CMS Category: Title V Major (A)
CMS Frequency: 2 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	Historical CMS FY	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	FY CMS Status
A – 2 yrs	12/1/2008 2009	2008	2/1/2008 (2008)	N/A	2/1/2008 (2008)	9/30/2010 (2010)	Not Overdue

Example 2

Example 2 demonstrates that the Facility had received its FCE for that historical fiscal year, therefore the FY CMS Status is Not Overdue.

CMS Origination Date: 2/1/2008
CMS Category: Title V Major (A)
CMS Frequency: 2 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	Historical CMS FY	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	FY CMS Status
A – 2 yrs	12/1/2010 (2011)	2010	2/1/2008 (2008)	5/1/2010 (2010)	5/1/2010 (2010)	9/30/2012 (2012)	Not Overdue

Example 3

Example 3 demonstrates that the Facility received its last FCE on 6/21/2008 but should have received another FCE by 9/30/2010. For historical CMS FY 2011, the Facility's FY CMS Status is Overdue.

CMS Origination Date: 2/1/2006
CMS Category: Title V Major (A)
CMS Frequency: 2 Federal Fiscal Years

CMS Cat.-Freq	Current Date (FY)	Historical CMS FY	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	FY CMS Status
A – 2 yrs	12/1/2011 (2012)	2011	2/1/2006 (2006)	6/21/2008 (2008)	6/21/2008 (2008)	9/30/2010 (2010)	Overdue

Example 4

Example 4 demonstrates that the Facility received an FCE on 11/1/2010. Since the Latest FCE Actual End Date was greater than 9/30/2010 and there were no earlier FCEs before 10/1/2010, the Latest FCE Actual End Date was not copied over to be included in the CMS Status calculation. The Facility did not receive its FCE by the Next FCE Due Date, so its CMS Status is Overdue.

CMS Origination Date: 2/1/2008
CMS Category: A: Title V Major
CMS Frequency: 2

CMS Cat.-Freq	Current Date (FY)	Historical CMS FY	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	FY CMS Status
A – 2 yrs	12/1/2010 (2011)	2010	2/1/2008 (2008)	N/A	2/1/2008 (2008)	9/30/2010 (2010)	Overdue

Example 5

Example 5 demonstrates that the Facility received its FCE by the Next FCE Due Date so the CMS Status was Not Overdue at the time the process ran on 12/1/2010 for the FY. When the CMS Frequency changed from 2 to 3 on 1/15/2011 and the CMS Start Date changed from 2/1/2002 to 1/15/2011, it prompted a new Next FCE Due Date for 3 instead of 2 Federal Fiscal Years.

CMS Origination Date: 2/1/2002
CMS Category:
    2/1/2002 - Title V Major (A)
CMS Frequency:
    2/1/2002 - 2 Federal Fiscal Years

Record on 1/15/2011

CMS Cat.-Freq	Current Date (FY)	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	Current CMS Status
A - 3 yrs.	1/15/2011 (2011)	1/15/2011 (2011)	9/15/2010	1/15/2011 (2011)	9/30/2014 (2014)	Not Overdue

Historical Records
Data that changed from the previous fiscal year are highlighted in yellow.

CMS Cat.-Freq	Current Date (FY)	Historical CMS FY	CMS Start Date (FY)	Latest FCE Actual End Date (FY)	CMS Effective Date (FY)	Next FCE Due Date (FY)	FY CMS Status
A - 2 yrs.	12/1/2010 (2010)	2010	2/1/2002 (2002)	9/15/2010	2/1/2002 (2002)	9/30/2010 (2010)	Not Overdue*
A - 3 yrs.	12/1/2011 (2011)	2011	1/15/2011 (2011)	9/15/2010	1/15/2011 (2011)	9/30/2014 (2014)	Not Overdue**

*This is the FY CMS Status for 12/1/2010 stored in historical archives.
**This is the latest FY CMS Status generated on 12/1/2011. Note: The most recent CMS Status will not overwrite the historical FY CMS Status.

3.1.3 Permit

A Permit, often referred to as an Operating Permit, is issued by permitting authorities to air pollution sources. A single air pollution source can have many permits. Similarly, a facility with multiple sources can have different permits assigned to each of the respective sources. It is not currently required that Delegated Agencies report Permit data to EPA.

There are two distinct categories of Permits: Title V Permits and Non-Title V Permits. Most large sources and some smaller sources of air pollution are required to obtain a Title V Operating Permit, a requirement mandated by the Title V amendment of the Clean Air Act. Title V Operating permits can be classified, and are often referred to, as either Part 70 or Part 71. Part 70 Permits are issued by the State, Local, and Tribal Permit Authorities, derived from the Code of Federal Regulations (CFR) at 40 CFR Part 70, which establishes minimum standards for State permits programs. Part 71 permits are EPA issued. In ICIS-Air, basic Permit functionality will be the same for Title V, both Part 70 and Part 71, and Non-Title V Permits.

The requirements, functionality, data elements, and business rules that support the processing of Permits are detailed in the following subsections.

3.1.3.1   Summary of Permit Modernization in ICIS-Air

Some Permit functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Permit Tracking Events**

  Users will have the capability to manually enter Permit Tracking Events and corresponding Permit Event dates. The following have been added as Permit Tracking Events based on the existing AFS list; EPA and Agencies will be able to add additional values if desired:
  – Draft Permit
  – Draft Permit Recorded by EPA
  – Draft Permit Submitted to Delegated Authority
  – Draft Permit Approved by Delegated Authority
  – EPA 45-Day Review Period
  – Modification Issued
  – EPA Objects to Permit
  – EPA Denies Revised Permit
  – EPA Objects to Permit Modification
  – EPA Denies Revised Modification
  – Public Petitions EPA
  – Public Petitions EPA – Modification
  – EPA Action – Public Petition

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Permits in ICIS-Air.

3.1.3.2   Permit Functional Requirements

Table 3.1-12 lists the requirements that apply to Permits. It includes functions that are allowed and business rules within a function.

Table 3.1-12. ICIS-Air Permit Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.1	EPA SRS	The system shall allow the user to add a new Permit record for a Facility.	ICIS-Air version 1.0
2.	N/A		The system shall allow the user to edit an existing Permit record.	ICIS-Air version 1.0
3.	N/A		The system shall allow the user to delete an existing Permit record.	ICIS-Air version 1.0
4.	5.5.3	EPA SRS	The system shall allow the user to enter Permit information for both Title V and non-Title V permits.	ICIS-Air version 1.0
5.	5.5.3	EPA SRS	The system shall allow Facilities to have multiple permits.	ICIS-Air version 1.0
6.	5.7.1	EPA SRS	The system shall not require the tracking of Permit data.	ICIS-Air version 1.0
7.	5.4.1, 5.7.1	EPA SRS	The system shall display the following data elements on the Permit screen for Permits: • Facility ID • Facility Name • Permit Identifier • Permit Type • Permit Issue Date • Permit Expiration Date • Name of Issuing Authority • Facility Record Permit Air Program Code • Facility Record Permit Pollutant Code • Permit Program Compliance • Flexible Permit: YES/NO • Permit URL • Access to permit in ECMS if available	ICIS-Air version 1.0
8.	5.7.1, 5.4.4	EPA SRS	The system shall require the following data if any permit information is entered: • Permit Type • Permit Identifier • Name of Issuing Authority	ICIS-Air version 1.0
9.	N/A	Comment Adjudication	The system shall generate Name of Issuing Authority based on the User ID and privileges of the user who entered the Permit information.	ICIS-Air version 1.0
10.	N/A		The system shall allow the user to manually edit Permit Tracking Events and corresponding Permit Tracking Event Dates: • Draft Permit • Draft Permit Received by EPA • Date Draft Permit Submitted to Delegated Authority • Date Draft Permit Approved by Delegated Authority • EPA 45-Day Review Period • Modification Issued • EPA Objects to Permit • EPA Denies Revised Permit • EPA Objects to Permit Modification • EPA Denies Revised Modification • Public Petitions EPA • Public Petitions EPA – Modification • EPA Action – Public Petition	ICIS-Air version 1.0
11.	N/A		The system shall enforce the security model for the users to view, add, edit, and delete a Permit. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
12.	N/A		The system shall display the Permit ID and Due Date on the Add TV ACC screen when the user clicks on the Add TV ACC button from the Edit Permit screen.	ICIS-Air version 1.0
13.	5.1.7, 5.4.8	EPA SRS	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Permit data.	ICIS-Air version 1.0
14.	5.1.7, 5.4.8	EPA SRS	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all new Permit data.	ICIS-Air version 1.0

3.1.3.3   *Permit Data Requirements*

Table 3.1-13 lists the data element requirements that apply to Permits.

Table 3.1-13. ICIS-Air Permit Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
1.	Y	Y	Y	Y		Facility ID • Foreign Key of Linked Facility
2.	Y	Y	Y	N	5.7.1	Permit Unique Identifier • Required Key for Permit • Must be unique • User Defined • Alphanumeric (15)
3.	N	Y	Y	N		Permit Type • Must be validated against Ref Table. • Valid Values: – Part 70 Title V – Part 71 Title V – Non-Title V
4.	N	N	N	N	5.7.1	Permit Tracking Event • Must be validated against Ref Table. – Draft Permit – Draft Permit Recorded by EPA – Draft Permit Submitted to Delegated Authority – Draft Permit Approved by Delegated Authority – EPA 45-Day Review Period – Modification Issued – EPA Objects to Permit – EPA Denies Revised Permit – EPA Objects to Permit Modification – EPA Denies Revised Modification – Public Petitions EPA – Public Petitions EPA – Modification – EPA Action – Public Petition
5.	N	N	N	N	5.7.1	Permit Tracking Event Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
6.	N	N	C	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Permit Modification Number • Conditionally system required if Permit Event Type is Modification Issued • Multiple for a Permit record • Alphanumeric (30)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
7.	N	Y	N	Y*	AFS SRS V2	Name of Issuing Authority • System Generated if: – Local User, corresponding LCON – State User entering a State Permit, corresponding State – If EPA, default to EPA • * Not System Generated if State User entering an LCON Permit; single selection of the LCONs within the State • Must be validated against Ref Table.
8.	N	N	N	N		Permit Issue Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
9.	N	N	N	N	AFS SRS V2	Permit Expiration Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
10.	N	N	N	N	5.7.1	Flexible Permit: • Valid Values: – Yes – No
11.	N	N	N	N	5.7.1	URL of Permit • Alphanumeric (100)
12.	N	N	N	N	5.7.1	Access to permit in ECMS if available • TBD
13.	N	N	N	N		Comments • Multiple for a Permit record • Alphanumeric (500) • Free-form text
14.	N	N	N	Y		Comment Entered On • Date • System generated
15.	N	N	N	Y		Comment Entered By • Alphanumeric (50) • System generated
16.	N	N	N	N		Sensitive Comment • Alphanumeric (1) • Valid Values: – N – Y (Default)
17.	N	N	N	N		User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
18.	N	N	N	N		User Defined Field 2 • Alphanumeric (100) • Free-form text
19.	N	N	N	N		User Defined Field 3 • Alphanumeric (100) • Free-form text
20.	N	N	N	N		User Defined Field 4 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format

ID	Key?	SR	PR	SG	Client Req ID	Requirement
21.	N	N	N	N		User Defined Field 5 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
22.	N	N	N	N		User Defined Field 6 • Alphanumeric (500) • Free-form text
23.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	User Defined Field Enforcement Sensitive Flag • Alphanumeric (1) • Valid Values: – Y (default) – N
24.	N	N	N	Y		Created By • System Generated based upon User ID
25.	N	N	N	Y		Created Date • System Generated • Date
26.	N	N	N	Y		Last Modified By • System Generated based upon User ID
27.	N	N	N	Y		Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/Conditional/No); SG = System Generated (Yes/No)

3.1.3.4 Permit Business Rule Requirements

Table 3.1-14 lists the business rules requirements that apply to Permits. This table includes the business rules for data elements and error handling.

Table 3.1-14. ICIS-Air Permit Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	When a Permit is added, the user must enter the Permit Type, Facility ID, and Permit Identifier or the transaction will be rejected.	ICIS-Air version 1.0
2.	N/A	The system shall not allow duplicate Permit Identifiers within the same Issuing Authority.	ICIS-Air version 1.0
3.	N/A	The following Permit data elements are not editable: • Permit Identifier • Facility ID • Name of Issuing Authority	ICIS-Air version 1.0
4.	N/A	The duration of the permit shall not exceed five years between the Issue and Expiration Dates.	ICIS-Air version 1.0
5.	N/A	If entered, the Date Draft Permit Approved by Delegated Authority must be greater than or equal to the Date Draft Permit Submitted to Delegated Authority	ICIS-Air version 1.0
6.	BR 3.B.2.b.V	There cannot be duplicate Tracking Events of the same Tracking Event Type for a particular Permit on the same day.	ICIS-Air version 1.0
7.	BR 3.B.2.b.V	When a user manually enters a Permit Tracking Event, a corresponding Tracking Event Date must also be entered, and vice versa.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
8.	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	If Permit Event Type of Modification Issued is selected, the user must enter a Permit Modification Number.	ICIS-Air version 1.0
9		If the Permit is deleted, the user will be prompted to delete associated TVACC records or only the links to associated TVACC records.	ICIS-Air version 1.0
10		Associated TVACC records will not be deleted through the Permit Deletion Batch transaction; only links to the associated TVACC records will be deleted.	ICIS-Air version 1.0

3.1.3.5   Add Permit

A Permit can be added to a Facility when the Permit is issued. To add a Permit, users must indicate the Permit Type because some data elements and functionality are unique to a specific type. Permit Type values are as follows:

- Part 70 Title V
- Part 71 Title V
- Non-Title V.

A Permit is uniquely identified by the following key data elements:

- Facility ID
- Permit Identifier.

Batch

Batch users will have an Add Permit transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements and business rules sections for more details on rejecting Permit add transactions.

Figure 3.1-35 illustrates the processing required for adding a Permit to ICIS-Air through a batch transaction.

**Figure 3.1-35. Use Case: Add Permit—Batch**
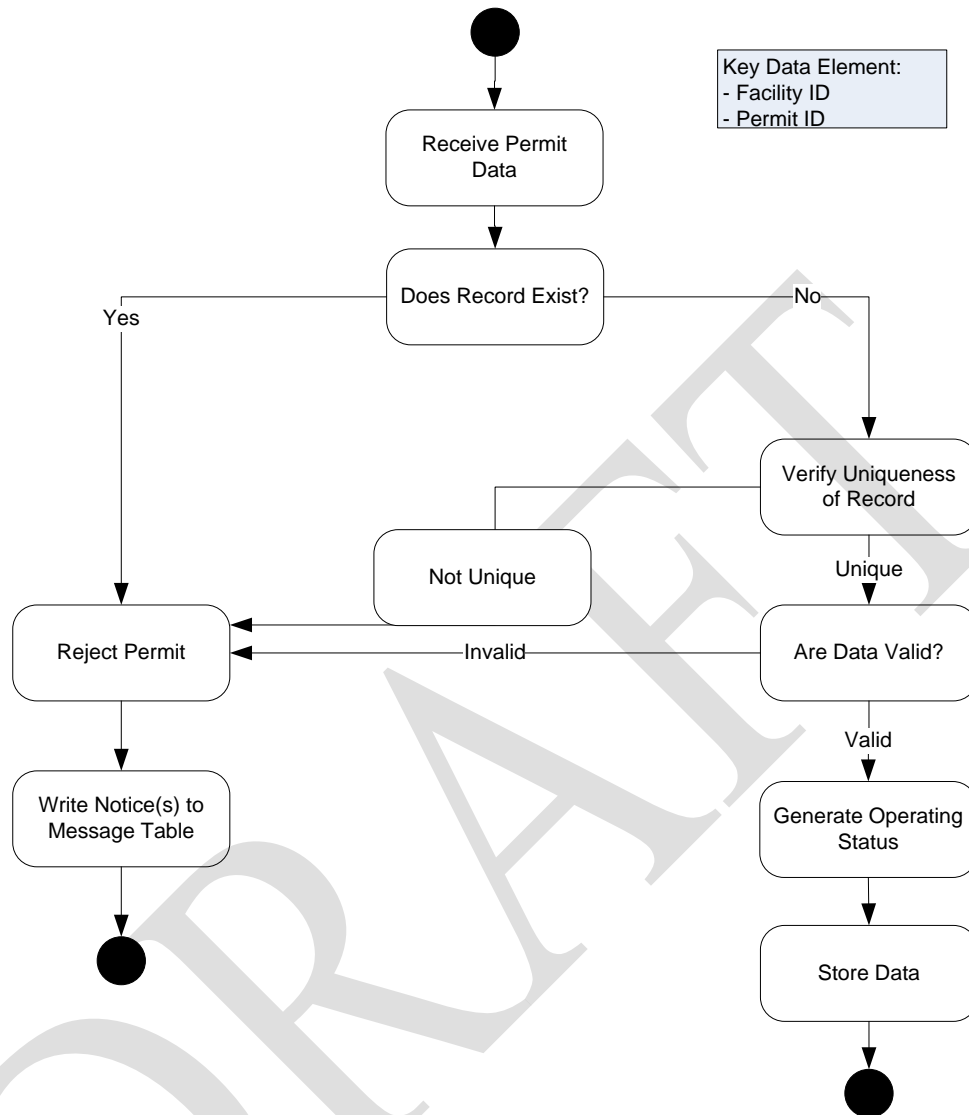
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.1.3.3, Permit Data Elements, and Section 3.1.3.4, Permit Business Rules, for more details.

Figure 3.1-36 illustrates the processing required for adding a Permit in ICIS-Air online.

Figure 3.1-36. Use Case: Add Permit—Web
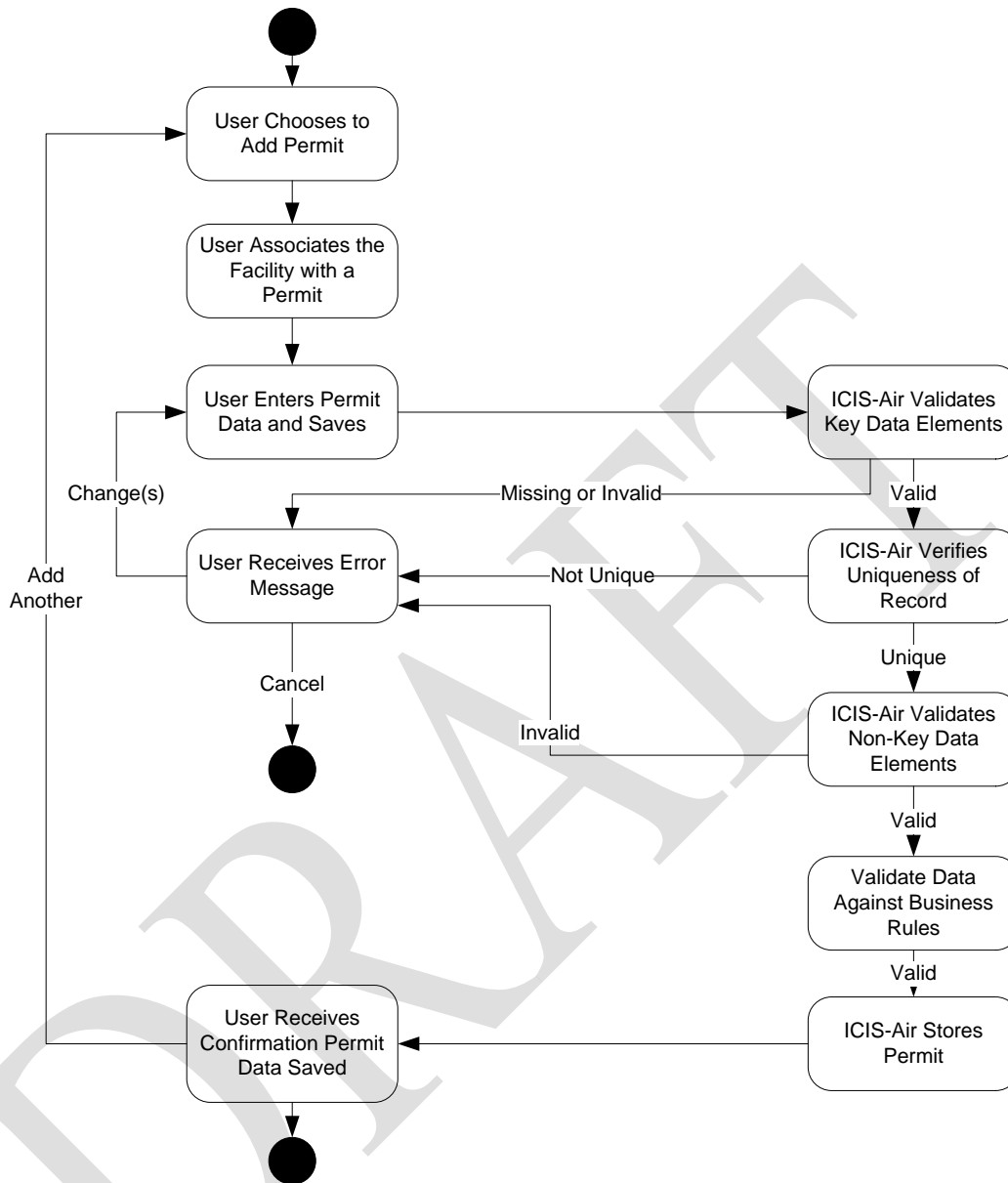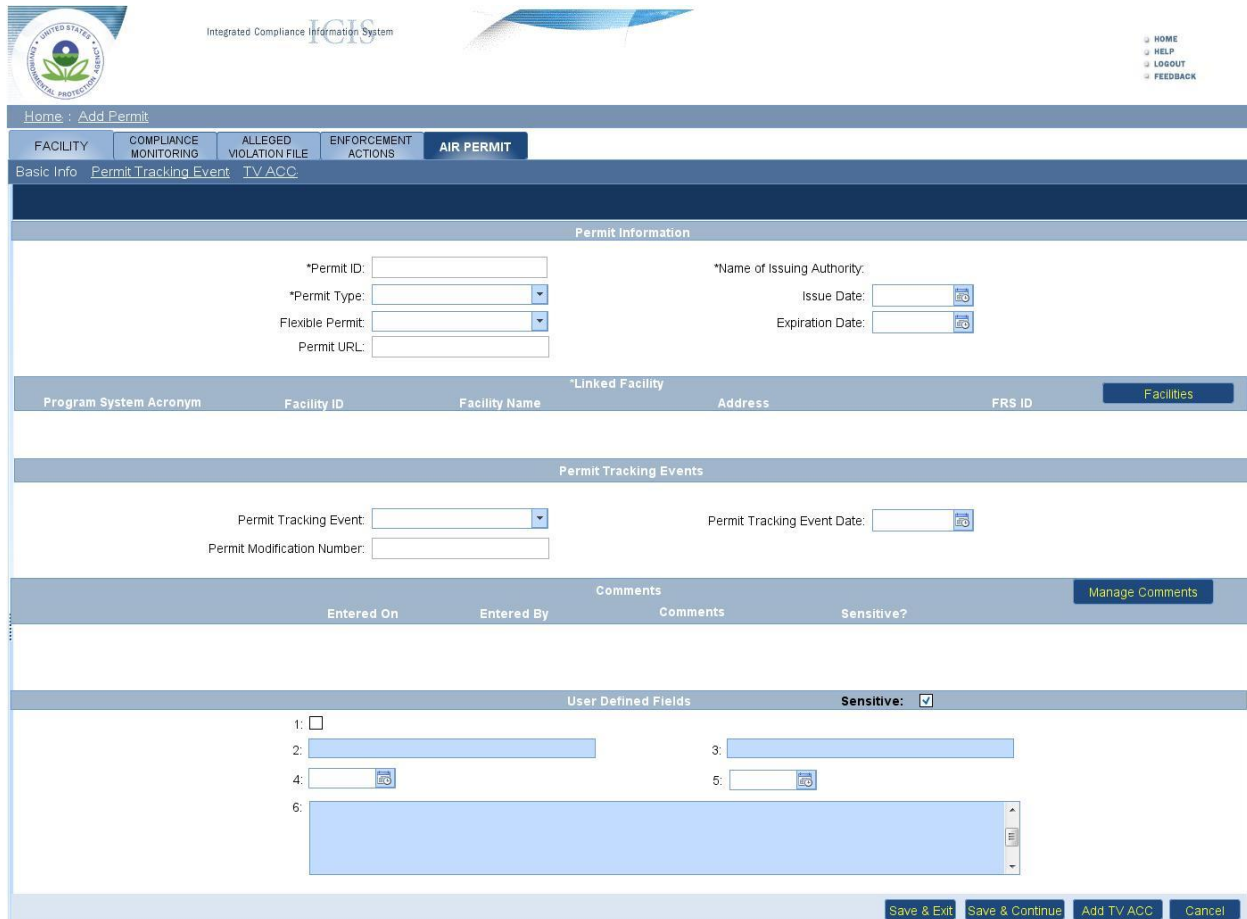
Figure 3.1-37 shows the Notional Add Permit screen.

Figure 3.1-37. Notional Screen: Add Permit (LCON user or State user entering State data)

3.1.3.6   Edit Permit

Users can edit a Permit within the current view of a Permit. The Edit Permit transaction allows users to change Permit data that are not system generated and are not key data elements.

Users can edit any Permit data elements except for the following:

- Permit Identifier
- Facility ID
- Name of Issuing Authority

Permit Identifier and Facility ID are the key data elements for a Permit and cannot be edited.

Batch

Batch users will have an Edit Permit transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.1.3.3 and business rules in Section 3.1.3.4 for more details on rejecting traditional Permit edit transactions.

Figure 3.1-38 illustrates the processing required for editing a Permit in ICIS-Air through a batch transaction.

Figure 3.1-38. Use Case: Edit Permit—Batch
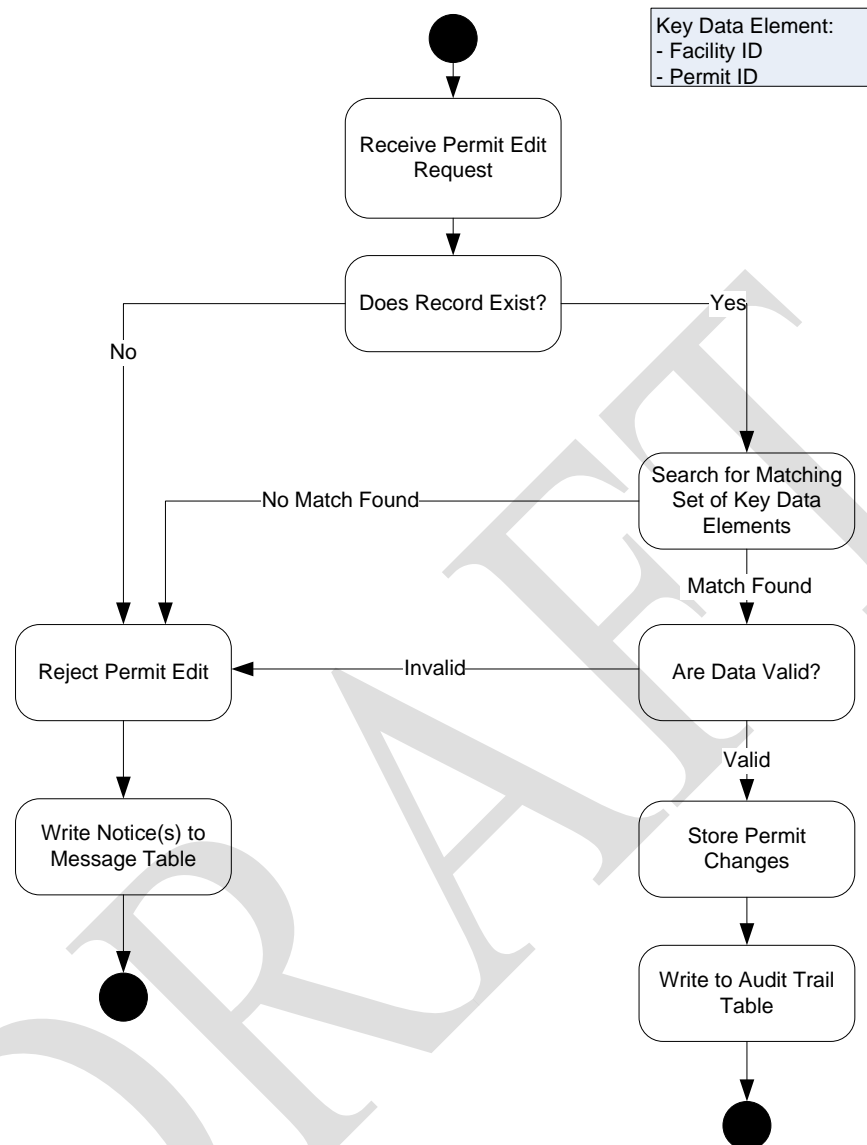
Key Data Element:
- Facility ID
- Permit ID

Receive Permit Edit Request

Does Record Exist?

No

Yes

Search for Matching Set of Key Data Elements

No Match Found

Match Found

Reject Permit Edit

Invalid

Are Data Valid?

Valid

Write Notice(s) to Message Table

Store Permit Changes

Write to Audit Trail Table

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.1.3.3, Permit Data Elements, and Section 3.1.3.4, Permit Business Rules, for more details.

Users may edit a traditional Permit by accessing the List Permit screen, selecting the radio button of the desired Permit, and clicking on the Edit button. ICIS-Air will display the Edit Permit screen for the selected traditional Permit.

Figure 3.1-39 illustrates the processing required for editing a Permit in ICIS-Air online.

Figure 3.1-39. Use Case: Edit Permit—Web
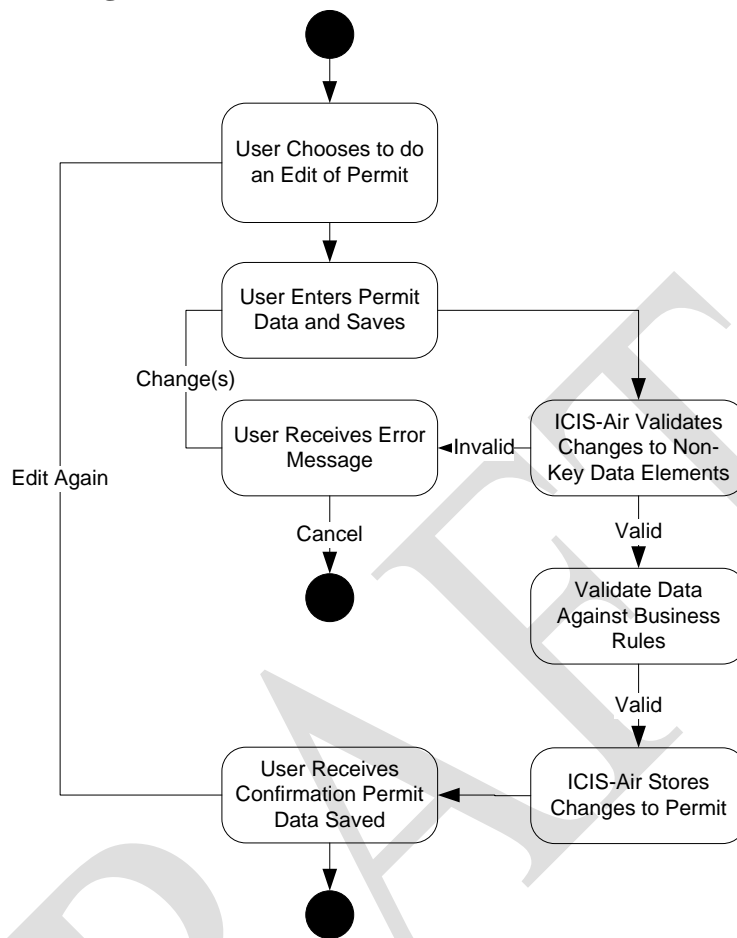
Figure 3.1-40 shows the Notional Edit Permit screen.

Figure 3.1-40. Notional Screen: Edit Permit

3.1.3.7   Delete Permit

When a user deletes a Permit, associated records will be deleted for that Permit. There are no restrictions on a user's ability to delete a permit except for the security permissions.

Batch

Batch users will have Delete Permit transactions rejected if the record does not exist, or the business rules are violated. Links to TVACC records will be deleted, but the TVACC records will not be deleted through the Delete Permit Batch transaction.

Figure 3.1-41 illustrates the processing required for deleting a Permit from ICIS-Air through a batch transaction.

Figure 3.1-41. Use Case: Delete Permit—Batch
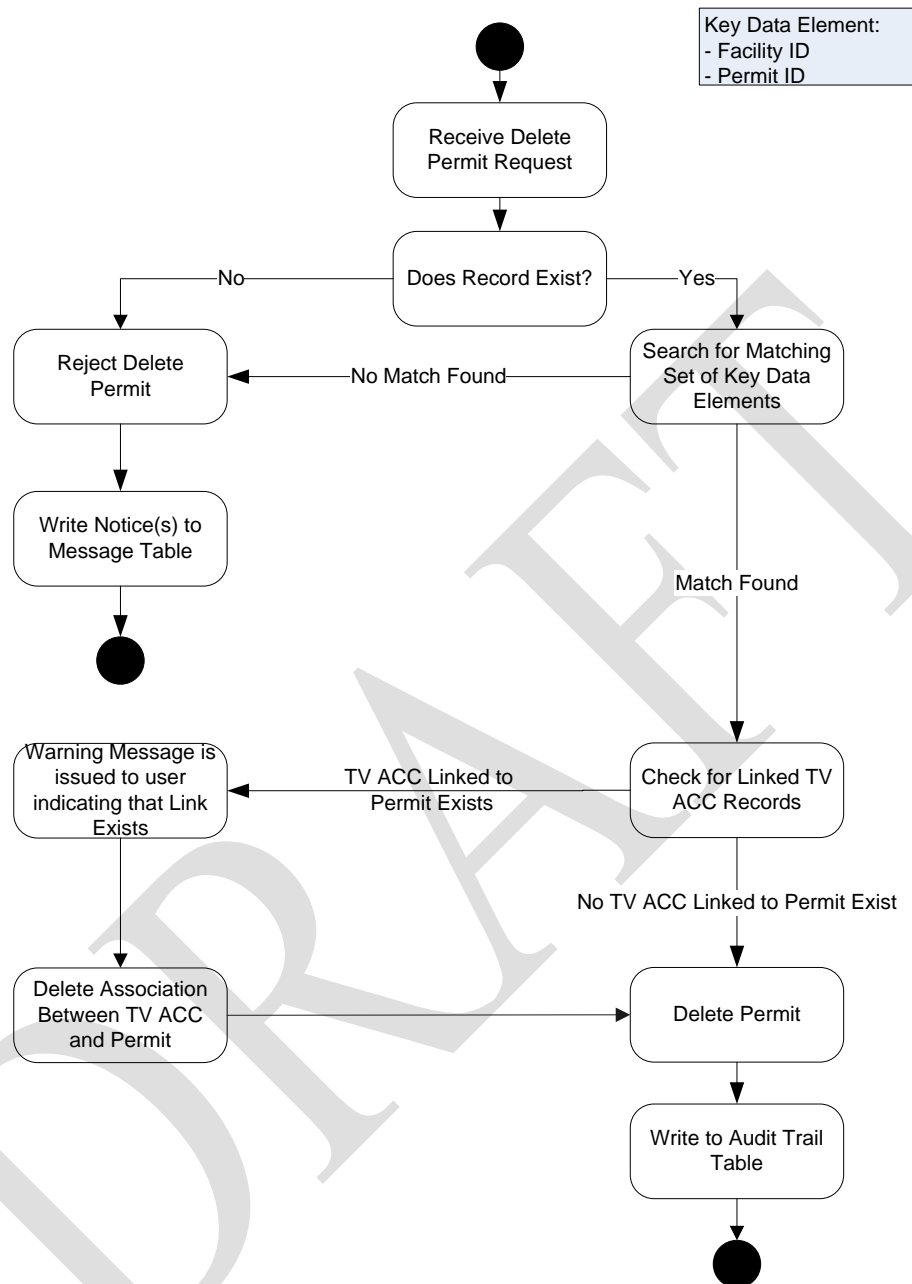
Web

Web users will receive an error message if the record does not exist or the business rules are violated. The user will be prompted to delete associated TVACC records or the only the links to those records.

Users may delete a Permit by searching for the permit, accessing the List Permit screen, selecting the radio button of the Permit they wish to delete, and clicking on the Delete button.

Figure 3.1-42 illustrates the processing required for deleting a Permit from ICIS-Air online.

Figure 3.1-42. Use Case: Delete Permit—Web
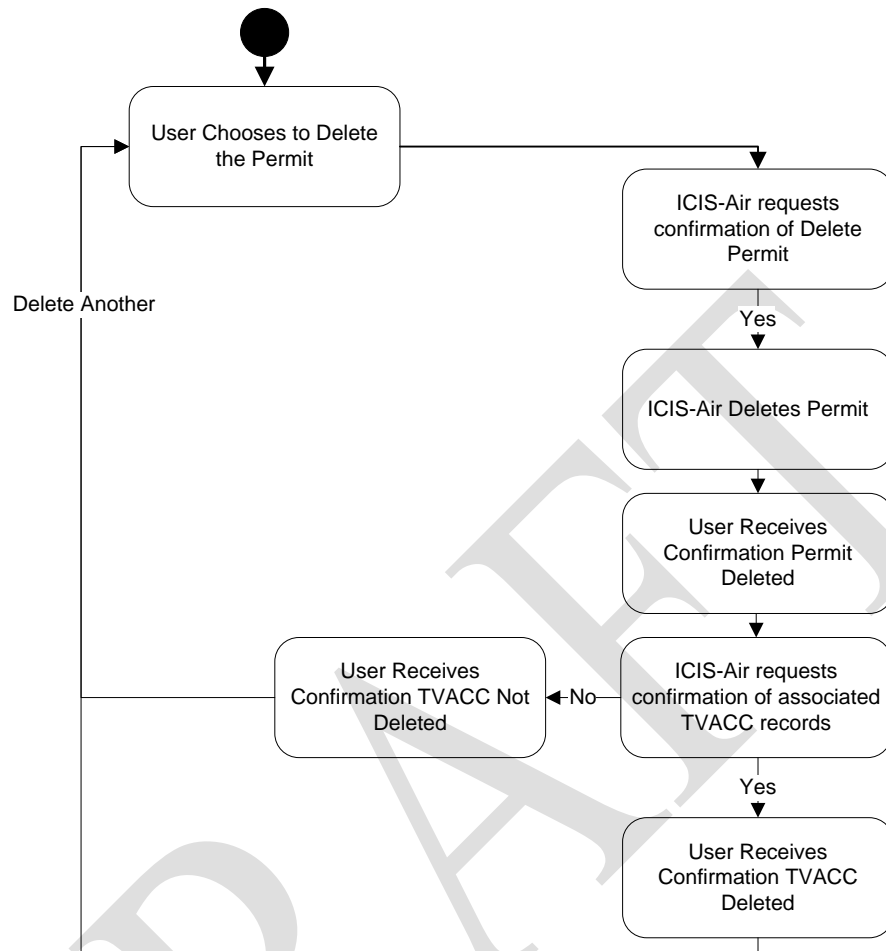
3.1.3.8   Search Permits—Web Only

Users will be able to view a list of all Permits. Users will access this screen by searching. ICIS-Air will then display the List Permit screen populated with a list of all Permits, in a predetermined sort order that meet the search criteria.

Note that the 'CAA Only' field will default to Air Permits if the user is a State air user without NPDES privileges or an LCON user.

Figure 3.1-43. Notional Screen: Search Permit: Air

From the Permit List screen, users can perform the following operations:

- Add Permit
- Edit Permit
- Delete Permit.

Figure 3.1-44 shows the user interface for viewing a list of all Permits.

Figure 3.1-44. Notional Screen: List Permits

3.1.4 Wood Stoves Reports

EPA regulates Wood Stoves particulate emissions, which contribute to significant air pollution, under 40 CFR Part 60, Subparts AAA, QQQQ, and RRRR. The certification process requires Wood Stove manufacturers to verify that each of the wood stove model lines meet a specific particulate emission limit by undergoing emission testing at an EPA accredited laboratory. The applications for certification and test reports are captured in the EPA's electronic reporting repository for review and reporting. The Wood Stove models that are in compliance with regulations are referred to as EPA-certified Wood Stoves.

The data flow process for the Wood Stove application process utilizing electronic reporting will be:

- Wood Stove Manufacturer Facilities will submit the Wood Stove certification applications to EPA through the Central Data Exchange (CDX) into the Electronic Reporting Tool (ERT). They will also submit documentation such as design drawings and operations manuals separately; as these may contain confidential business information (CBI), they will not be imported into ICIS-Air.
- EPA's electronic reporting repository, WebFIRE, will store the applications and metadata, and is the source from which ICIS-Air will receive the data.
- Testing Labs provide a Test Report to the Manufacturers, who then submit the Test Report to EPA. EPA then provides feedback to the Wood Stove Manufacturers on their status of certification.
- ICIS-Air will import the Wood Stove certification application, metadata, and review data from WebFIRE and link the record to the actual documents in WebFIRE.

Refer to the External Interface Systems Module for EPA's electronic reporting repository for additional information on the interface process and requirements.

This Wood Stove module section provides requirements for how the users will access Wood Stove data in ICIS-Air once the data have been imported from the electronic reporting repository. It also includes notional screens as examples of how users will view the Wood Stove data, as well as the ability for users to search on the data and link the data to Compliance Monitoring Activities, Enforcement Actions, and Alleged Violations.
The requirements, functionality, data elements, and business rules that support the processing of Wood Stoves are detailed in the following subsections.

Note that regulations pertaining to Wood Stoves electronic reporting have not yet been solidified, thus the requirements and data elements listed will need to be revisited when the regulations are finalized.

3.1.4.1 Summary of Wood Stoves Modernization in ICIS-Air

Wood Stoves are new functionality in ICIS-Air to better align the system with users' business needs. A summary follows.

- **Capturing Wood Stove Data**
  Legacy AFS does not capture Wood Stove data. ICIS-Air will store Wood Stove related information such as a list of EPA accredited Testing Laboratories, a list of 3rd Party ISO Accredited Laboratories, Certification Review Status, and Wood Stove Manufacturer Facilities data, and the ability to generate an approved list of EPA-certified Wood Stoves.

Manufacturers will report as individual Facilities in ICIS-Air. The Wood Stove data will be imported from the EPA's electronic reporting repository and users will be able to view the detailed data in addition to searching and reporting on the data.

- **Electronic data from the electronic reporting repository**

  Electronic Wood Stoves data are submitted by the Wood Stove Manufacturers via CDX, and data are loaded into the electronic reporting repository via ERT. Legacy AFS does not import electronic Wood Stove data from an external system. ICIS-Air will import electronic Wood Stove data and provide a link to the Wood Stove records in the electronic reporting repository.

- **Read-Only Wood Stoves Data**

  All Wood Stoves data in ICIS-Air will be read-only since they will be imported from EPA's electronic reporting repository. Therefore, users will not be able to add, edit, or delete any imported data via the web or batch.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Wood Stoves in ICIS-Air.

3.1.4.2   Wood Stoves Functional Requirements

Table 3.1-15 lists the requirements that apply to Wood Stoves. It includes functions that are allowed and business rules within a function.

Table 3.1-15. ICIS-Air Wood Stoves Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.34	SME Meeting	The system shall allow the user to access the Wood Stoves screen from the homepage and from the Facility screen.	ICIS-Air version 1.0
2.	5.34	Woodheater ERT requuirements OEI.docx	The system shall display the following data elements on the View Wood Stoves screen: • Unique Identifier • Model Number • Model Name • Wood Heater Type • Regulation Subpart • Certification Number • Certification Status • Link to Certification Application • Facility Name • Facility ID • Facility Address • Facility City • Facility State • Facility Zip Code • Facility Phone Number • Facility EIN Number • Non-Government Contacts and Addresses – Affiliation – First Name – Last Name	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			– Address – Phone – Fax – E-mail – Office – Organization • Permanent storage location and the measures taken to seal the unit against tampering • Describe any special operation instruction that were provided to the laboratory • Firebox Dimensions • Cross Sectional Area of Inlets, Outlets, and Location and Method of Control • Baffles - Dimensions and Location • Refractory, Insulation, Dimension, Location, and Materials • Catalyst - Dimensions and Location • Catalyst bypass mechanism and catalyst bypass gap tolerances: dimensions, cross sectional area and location • Flue Gas Exit - Location and Exit • Door and catalyst bypass gaskets: dimensions, fit and materials • Outer shielding and coverings: dimensions and location • Fuel feed system (if applicable) - fuel feed rate, auger motor design and power rating, and the angle of the auger to firebox • Forced air combustion system (if applicable) - location and horsepower of blower motors and fan blade size • Dimensions Tolerances greater than +/-.25" (or +/-5% for cross sectional areas) when all components are assembled • Tested Wood Heater Material if Different from Manufacturer • Link to Photographs • Link to Owner's Manual • Catalyst Brand and Model • Can the catalyst be visually inspected during normal heater operation or under typical installation conditions? Describe what the owner must do to make observation • Describe catalyst installation and removal procedures • Catalyst Warranty • Describe location, size, and design of ports for monitoring catalyst temperature. Identify commercially available monitoring devices which are compatible	

ID	Client Req ID	Source Reference	Requirement	Planned Release
3.	5.34	SME Meeting	The system shall display the following data elements on the View Test Report screen: • Unique Identifier • Facility ID • Model Number • Model Name • Laboratory Name • Laboratory Address • Altitude • Describe sampling location relative to wood heater • Analytical Methods • Test Fuel Properties • Link to Test Reports • Link to Firebox Configuration • Link to Sampling Location Drawings and Photographs • Link to Laboratory Certificate of Conformity • Date Received • Date of Test • Sampling Method • Number of Test Runs • Variations in Certification Test • Summary of Test Data • Process Operation During Test • Sampling Calculations and Results • Raw Field Data • Sampling and Operation Records • Sampling and Analytical Procedures • Analytical Data • Test Run Problems and Solution • Calibration procedures and results, certification procedures, sampling and analysis procedures • Test Method quality control procedures and results – leak checks, volume meter checks, stratification (velocity) checks, proportionality results • Additional Information • Test Participants Affiliation • Test Participants Contacts and Addresses – Affiliation – First Name – Last Name – Address – Phone – Fax – E-mail – Office – Organization	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
4.	5.34	SME Meeting	The system shall enforce the security model for the users to view, add, edit, and delete a Wood Stoves record. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
5.	5.34	SME Meeting	The system shall receive all Wood Stoves data, including calculated data, from the electronic reporting repository.	ICIS-Air version 1.0
6.	5.34	SME Meeting	The system shall notify the system administrator if errors occurred during the Wood Stoves data imports.	ICIS-Air version 1.0
7.	5.34	SME Meeting	The system shall notify contacts listed in an ICIS Wood Stoves Notification List reference table when Wood Stove data have been received from the electronic reporting repository and are available for viewing.	ICIS-Air version 1.0

3.1.4.3 Wood Stoves Data Requirements

Table 3.1-16 lists the data element requirements that apply to Wood Stoves. This table includes the system, minimum data requirements, and possible future data elements.

Table 3.1-16. ICIS-Air Wood Stoves Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
Wood Stove Information						
1.	Y	N	N	Y	N/A	Unique Identifier • System generated unique identifier • Alphanumeric (15)
2.	N	Y	Y	N	N/A	Facility ID • Foreign Key of Linked Facility • Identified as Wood Stove Facility
3.	N	Y	Y	N	N/A	Model Number • Alphanumeric (15)
4.	N	Y	Y	N	N/A	Model Name • Alphanumeric (50)

5.	N	N	N	N	N/A	Wood Heater Type
						• Valid Values:
						  – Catalytic
						  – Non-Catalytic
						  – Other

6.	N	N	N	N	N/A	Regulation • Valid Values: – 40 CFR Part 60

7.	N	N	N	N	N/A	Subpart
						• Valid Values:
						  – Subpart AAA
						  – Subpart QQQQ
						  – Subpart RRRR

8.	N	N	N	N	N/A	Certification Number • Alphanumeric (30)

ID	Key?	SR	PR	SG	Client Req ID	Requirement

9.	N	N	N	N	N/A	Certification Status
						• Valid Values:
						  – Approved
						  – Declined

10.	N	N	N	N	N/A	Link to Certification Application • URL to Report in electronic reporting repository
11.	N	N	N	N	N/A	Non-Government Contacts Affiliation Type • Valid Values: – Designated Representative
12.	N	N	N	N	N/A	Non-Government Contacts First Name • Alphanumeric (30) • Free-form text
13.	N	N	N	N	N/A	Non-Government Contacts Last Name • Alphanumeric (30) • Free-form text
14.	N	N	N	N	N/A	Non-Government Contacts Address • Alphanumeric (60) • Free-form text
15.	N	N	N	N	N/A	Non-Government Contacts City • Alphanumeric (60) • Free-form text
16.	N	N	N	N	N/A	Non-Government Contacts State • Alphanumeric (2)
17.	N	N	N	N	N/A	Non-Government Contacts Zip Code • Numeric (14)
18.	N	N	N	N	N/A	Non-Government Contacts Phone • Numeric (14) • Free-form text
19.	N	N	N	N	N/A	Non-Government Contacts Fax • Numeric (14) • Free-form text
20.	N	N	N	N	N/A	Non-Government Contacts E-mail • Alphanumeric (30) • Free-form text
21.	N	N	N	N	N/A	Non-Government Contacts Office • Alphanumeric (50)
22.	N	N	N	N	N/A	Non-Government Contacts Organization • Alphanumeric (50)
23.	N	N	N	N	N/A	Permanent storage location and the measures taken to seal the unit against tampering • Alphanumeric (100)
24.	N	N	N	N	N/A	Describe any special operation instruction that were provided to the laboratory • Alphanumeric (100)
25.	N	N	N	N	N/A	Firebox Dimensions • Alphanumeric (100)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
26.	N	N	N	N	N/A	Cross Sectional Area of Inlets, Outlets, and Location and Method of Control • Alphanumeric (100)
27.	N	N	N	N	N/A	Baffles - Dimensions and Location • Alphanumeric (100)
28.	N	N	N	N	N/A	Refractory, Insulation, Dimension, Location, and Materials • Alphanumeric (100)
29.	N	N	N	N	N/A	Catalyst - Dimensions and Location Alphanumeric (100)
30.	N	N	N	N	N/A	Catalyst bypass mechanism and catalyst bypass gap tolerances: dimensions, cross sectional area and location • Alphanumeric (100)
31.	N	N	N	N	N/A	Flue Gas Exit - Location and Exit • Alphanumeric (100)
32.	N	N	N	N	N/A	Door and catalyst bypass gaskets: dimensions, fit and materials • Alphanumeric (100)
33.	N	N	N	N	N/A	Outer shielding and coverings: dimensions and location • Alphanumeric (100)
34.	N	N	N	N	N/A	Fuel feed system (if applicable) - fuel feed rate, auger motor design and power rating, and the angle of the auger to firebox • Alphanumeric (100)
35.	N	N	N	N	N/A	Forced air combustion system (if applicable) - location and horsepower of blower motors and fan blade size • Alphanumeric (100)
36.	N	N	N	N	N/A	Dimensions Tolerances greater than +/-.25" (or +/-5% for cross sectional areas) when all components are assembled • Alphanumeric (100)
37.	N	N	N	N	N/A	Tested Wood Heater Material if Different from Manufacturer • Alphanumeric (100)
38.	N	N	N	N	N/A	Links to Photographs • URL to Report in electronic reporting repository • Multiple links
39.	N	N	N	N	N/A	Catalyst Brand and Model • Alphanumeric (50)
40.	N	N	N	N	N/A	Can the catalyst be visually inspected during normal heater operation or under typical installation conditions? Describe what the owner must do to make observation • Alphanumeric (100)
41.	N	N	N	N	N/A	Describe catalyst installation and removal procedures • Alphanumeric (100)
42.	N	N	N	N	N/A	Catalyst Warranty • URL to Report in electronic reporting repository
43.	N	N	N	N	N/A	Describe location, size, and design of ports for monitoring catalyst temperature. Identify commercially available monitoring devices which are compatible • Alphanumeric (100)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
Test Report						
44.	N	N	N	N	N/A	Laboratory Name • Alphanumeric (60)
45.	N	N	N	N	N/A	Laboratory Address • Alphanumeric (60) • Free-form text
46.	N	N	N	N	N/A	Laboratory City • Alphanumeric (60) • Free-form text
47.	N	N	N	N	N/A	Laboratory State • Alphanumeric (2)
48.	N	N	N	N	N/A	Laboratory Zip Code • Numeric (14)
49.	N	N	N	N	N/A	Altitude • Alphanumeric (100)
50.	N	N	N	N	N/A	Describe sampling location relative to wood heater • Alphanumeric (100)
51.	N	N	N	N	N/A	Analytical Methods • Alphanumeric (100)
52.	N	N	N	N	N/A	Test Fuel Properties • Alphanumeric (100)
53.	N	N	N	N	N/A	Link to Test Reports • URL to Report in electronic reporting repository • Multiple links
54.	N	N	N	N	N/A	Link to Firebox Configuration • URL to Report in electronic reporting repository • Multiple links
55.	N	N	N	N	N/A	Link to Sampling Location Drawings and Photographs • URL to Report in electronic reporting repository • Multiple links
56.	N	N	N	N	N/A	Link Laboratory Certificate of Conformity • URL to Report in electronic reporting repository • Multiple links
57.	N	N	N	N	N/A	Date Received • Date
58.	N	N	N	N	N/A	Date of Test • Date

59.	N	N	N	N	N/A	Sampling Method
						• When Subpart is AAA, the values are-
						  – RM 28R (4 run)/ASTM 2515
						  – RM28R (1 run)/ASTM 2515
						  – ASTM E 2779-10/ASTM 2515
						• When Subpart is QQQQ, the values are-
						  – RM 28HH/ASTM 2515
						  – CSA B415.1/ASTM 2515
						• When Subpart is RRRR, the values are-
						  – ASTM WK26057/ASTM 2515

60.	N	N	N	N	N/A	Number of Test Runs • Numeric (10)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
61.	N	N	N	N	N/A	Variations in Certification Test • Alphanumeric (50)
62.	N	N	N	N	N/A	Summary of Test Data • Alphanumeric (200)
63.	N	N	N	N	N/A	Process Operation During Test • Alphanumeric (200)
64.	N	N	N	N	N/A	Sampling Calculations and Results • Alphanumeric (200)
65.	N	N	N	N	N/A	Raw Field Data • Alphanumeric (200)
66.	N	N	N	N	N/A	Sampling and Operation Records • Alphanumeric (200)
67.	N	N	N	N	N/A	Sampling and Analytical Procedures • Alphanumeric (200)
68.	N	N	N	N	N/A	Analytical Data • Alphanumeric (200)
69.	N	N	N	N	N/A	Test Run Problems and Solution • Alphanumeric (200)
70.	N	N	N	N	N/A	Calibration procedures and results, certification procedures, sampling and analysis procedures • URL to Report in electronic reporting repository • Multiple links
71.	N	N	N	N	N/A	Test Method quality control procedures and results – leak checks, volume meter checks, stratification (velocity) checks, proportionality results • URL to Report in electronic reporting repository • Multiple links
72.	N	N	N	N	N/A	Additional Information • Alphanumeric (250)
73.	N	N	N	N	N/A	Test Participants Contacts Affiliation Type • Valid Values: – Designated Representative
74.	N	N	N	N	N/A	Test Participants Contacts First Name • Alphanumeric (30) • Free-form text
75.	N	N	N	N	N/A	Test Participants Contacts Last Name • Alphanumeric (30) • Free-form text
76.	N	N	N	N	N/A	Test Participants Contacts Phone • Alphanumeric (14) • Free-form text
77.	N	N	N	N	N/A	Test Participants Contacts Fax • Alphanumeric (14) • Free-form text
78.	N	N	N	N	N/A	Test Participants Contacts E-mail • Alphanumeric (30) • Free-form text
79.	N	N	N	N	N/A	Test Participants Contacts Office • Alphanumeric (50)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
80.	N	N	N	N	N/A	Test Participants Contacts Organization • Alphanumeric (50)
81.	N	N	N	N	N/A	Wood Stoves Notification E-mail • Must be validated against ICIS Wood Stoves Government Contact Notification List REF table

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.1.4.4 Wood Stoves Business Rule Requirements

Table 3.1-17 lists the business requirements that apply to Wood Stoves. This table includes the business rules for data elements and error handling.

Table 3.1-17. ICIS-Air Wood Stoves Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.34	The system shall ensure that the Wood Stove record is associated to an existing Facility.	ICIS-Air version 1.0
2.	5.34	The system shall ensure that zero to many Wood Stove records can be associated to a Facility.	ICIS-Air version 1.0
3.	5.34	The system shall ensure that one or many Test Reports can be associated to a Wood Stove record.	ICIS-Air version 1.0
4.	5.34	The system shall ensure that zero or many Non-Government Contacts can be associated to a Wood Stove record.	ICIS-Air version 1.0
5.	5.34	The system shall ensure that zero or many Test Participants Contacts can be associated to a Test Report record.	ICIS-Air version 1.0
6.	5.34	The system shall update the audit table with the system name of where the Wood Stove data came from and the date of when the data was imported into ICIS-Air for all new Wood Stove data.	ICIS-Air version 1.0
7.	5.34	The system shall update the audit table with the system name of where the Wood Stove data came from and the date of when the data was updated in ICIS-Air for all existing Wood Stove data.	ICIS-Air version 1.0

3.1.4.5 View Wood Stoves Data

Users will be able to view Wood Stoves data that have been imported from the electronic reporting repository. All imported data will be read-only; users will not be able to add, edit or delete Wood Stoves data in ICIS-Air.

The following data elements are key data elements that uniquely identify a Wood Stoves record:

• Unique Identifier
• Facility ID

Model Number

Figure 3.1-45 shows the user interface for viewing a Wood Stoves record. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.1-45. Notional Screen: View Wood Stoves Data

Users will be able to view the Test Reports that are associated with the Wood Stove record and linked Test Reports that reside in the electronic reporting repository. A Wood Stove record may be associated to multiple Test Reports. Figure 3.1-46 shows the list screen for the user interface to view and select the Test Report to view, and Figure 3.1-47 shows the user interface for viewing a Test Report record. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.1-46. Notional Screen: List Test Reports

Figure 3.1-47. Notional Screen: View Test Report

3.1.5 Incidents

3.1.5.1 Summary of Incidents in ICIS-Air

The purpose of the Incidents module is to record and track information about unplanned events that occur at a Facility or other location that may have an impact on operations or enforcement at the Facility, such as a fire or bankruptcy. Incident information can be obtained through a citizen tip/complaint or through required notification, and the source of the information can be tracked in the system through Incident Contacts.

3.1.5.2 Incident Functional Requirements

Table 3.1-18 lists the requirements that apply to Incidents. It includes functions that are allowed and business rules within a function.

Table 3.1-18. ICIS-Air Incident Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.4.6, 5.9.12	EPA SRS	The system shall allow the user to add a new Incident record.	ICIS-Air version 1.0
2.	5.4.6, 5.9.12	EPA SRS	The system shall allow the user to edit an existing Incident record.	ICIS-Air version 1.0
3.	5.4.6, 5.9.12	EPA SRS	The system shall allow the user to delete an existing Incident record.	ICIS-Air version 1.0
4.	5.1.1, 5.1.5	EPA SRS	The system shall allow the user to search for an Incident by populating any one of the following fields or combination of fields: • Incident Unique Identifier • Incident Name • Incident Type • Location • Date • Facility Name • Facility ID • FRS ID • Registration Number • Name of Issuing Authority • Region • LCON • Government Ownership Flag • Federal Facility Ownership Flag • Tribal Ownership Flag • Tribal Land • Facility Address • Facility State • Facility County • Facility City • Facility Zip Code • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6	ICIS-Air version 1.0
5.	5.1.3	EPA SRS	The system shall allow the user to sort the incidents presented in a search results list.	ICIS-Air version 1.0
6.	5.1.3	EPA SRS	The system shall provide up to 500 responses in an Incident search.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
7.	5.1.3	EPA SRS	The system shall display a message to the user to refine search criteria if the incident search yields more than 500 responses.	ICIS-Air version 1.0
8.	N/A		The system shall enforce the security model for the users to view, add, edit, and delete an Incident. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
9.	5.6.1	EPA SRS	The system shall display the following data elements on the Incident screen: • Facility ID • Facility Site Name • Incident Unique Identifier • Incident Date • Incident Type • Incident Name • Incident Description • Air Programs • Pollutants • Confidential Flag • Incident Contact and Address Information (e.g., owners and operators) • User Defined Field Enforcement Sensitive Flag • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6 • Created Date • Created By • Updated Date • Updated By	ICIS-Air version 1.0
10.	N/A		The system shall require the user to enter data into the following fields to add a new Incident: • Facility ID • Incident Unique Identifier	ICIS-Air version 1.0
11.	N/A		The system shall allow the user to add an Air Program on an Incident record.	ICIS-Air version 1.0
12.	N/A		The system shall allow the user to edit an Air Program on an Incident record.	ICIS-Air version 1.0
13.	N/A		The system shall allow the user to delete an Air Program on an Incident record.	ICIS-Air version 1.0
14.	N/A		The system shall allow the user to add a Pollutant to an Incident Record.	ICIS-Air version 1.0
15.	N/A		The system shall allow the user to edit a Pollutant on an Incident Record.	ICIS-Air version 1.0
16.	N/A		The system shall allow the user to delete a Pollutant from an Incident Record.	ICIS-Air version 1.0
17.	5.6.3		The system shall require the user to enter data into of the following fields to add a new Pollutant record: • Pollutant Code or Chemical Abstract Service Number	ICIS-Air version 1.0
18.	N/A		The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Facility data.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
19.	N/A		The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all new Facility data.	ICIS-Air version 1.0

3.1.5.3 Incident Data Requirements

Table 3.1-19 lists the data element requirements that apply to Incidents. This table includes the system, minimum data requirements, and possible future data elements.

Table 3.1-19. ICIS-Air Incident Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
1.	N	N	N	Y		Facility Identifier • Alphanumeric (15)
2.	N	Y	N	Y	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Unique Identifier • User Defined or System Generated • Alphanumeric (15)
3.	N	Y	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
4.	N	Y	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Type • Must be validated against Ref Table.
5.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Name • Alphanumeric (50) • Free-form text
6.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Description • Alphanumeric (200) • Free-form text
7.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Location • Alphanumeric (60) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Requirement

8.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Air Programs
						• Allow multiples
						• Must be validated against Ref Table.
						• Valid Values:
						  – State Implementation Plan (SIP) (0)
						  – SIP Source under Federal Jurisdiction (1)
						  – Non-Federally Reportable Source (3)
						  – Chlorofluorocarbons (CFC) Tracking (4)
						  – Prevention of Significant Deterioration (PSD) (6)
						  – New Source Review (NSR) (7)
						  – National Emission Standards for Hazardous Air Pollutants (NESHAP) (8)
						  – New Source Performance Standards (NSPS) (9)
						  – Acid Precipitation (A)
						  – Federally Enforceable State Operating Permit – Non Title V (FESOP) (F)
						  – Part 98, The Mandatory Greenhouse Gas (GHG) Reporting Rule (G)
						  – Native American (I)
						  – Maximum Achievable Control Technology (MACT) Section 63 NESHAP (M)
						  – Tribal Implementation Plan (TIP) (T)
						  – Title V Permits (V)
						  – Other

9.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 8/10/2012	Other Air Program • Alphanumeric (50) • Free-form text
10.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident Pollutant Code • Allow multiples • Must be validated against Ref Table. • 5 digit code from Legacy AFS • OR Pollutant ID
11.	N	Y	Y	Y	5.6.3 MDR	Chemical Abstract Service Number • Must be validated against Ref Table • 9 digit Numeric code

12.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Confidential
						• Alphanumeric (1)
						• Valid Values:
						  – N(default)
						  – Y

13.	N	N	N	N		Contacts Role Type • Must be validated against Contacts table
14.	N	N	N	N		Contacts ID • Must be validated against Contacts table

ID	Key?	SR	PR	SG	Client Req ID	Requirement
15.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
16.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident User Defined Field 2 • Alphanumeric (100) • Free-form text
17.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident User Defined Field 3 • Alphanumeric (100) • Free-form text
18.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident User Defined Field 4 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
19.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident User Defined Field 5 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
20.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Incident User Defined Field 6 • Alphanumeric (500) • Free-form text
21.	N	N	N	Y	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	User Defined Field Enforcement Sensitive Flag • Alphanumeric (1) • Valid Values: – Y (default) – N
22.	N	N	N	Y		Created By • System Generated based upon User ID
23.	N	N	N	Y		Created Date • System Generated • Date
24.	N	N	N	Y		Last Modified By • System Generated based upon User ID

ID	Key?	SR	PR	SG	Client Req ID	Requirement
25.	N	N	N	Y		Last Modified Date • System Generated • Date

3.1.5.4   Incident Business Rule Requirements

Table 3.1-20 lists the business rules requirements that apply to Incidents. This table includes the business rules for data elements and error handling.

Table 3.1-20. ICIS-Air Incident Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.4.6	The Incident must be unique within the system. An Incident is uniquely defined by the Incident Unique Identifier.	ICIS-Air version 1.0
2.	N/A	An Incident may be associated with multiple Air Programs.	ICIS-Air version 1.0
3.	Comment Adjudication meeting 8/24/2012	When an Air Program 'Other' is selected, Air Program Other Description must be populated.	ICIS-Air version 1.0
4.	Comment Adjudication meeting 8/24/2012	When an Air Program 'Other' is selected, a Federal Air Program must also be selected.	ICIS-Air version 1.0
5.	N/A	An Incident may be associated with multiple Pollutants.	ICIS-Air version 1.0
6.	N/A	A pollutant may only be associated with an Incident once.	ICIS-Air version 1.0
7.	5.6.3	If the Pollutant Code is provided, the system will populate the CASN.	ICIS-Air version 1.0
8.	5.6.3	If the CASN field is provided, the system will populate the Pollutant Code.	ICIS-Air version 1.0
9.	N/A	Multiple Contacts may be associated with an Incident.	ICIS-Air version 1.0
10.	N/A	One Address may be associated with a Contact Record.	ICIS-Air version 1.0

3.1.5.5   Add Incident

An Incident is uniquely identified by the following key data elements:

- Facility ID
- Incident Unique Identifier.

Batch

Batch users will have an Add Incident transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements and business rules sections for more details on rejecting Incident add transactions.

Figure 3.1-48. Use Case: Add Incident—Batch illustrates the processing required for adding an Incident to ICIS-Air through a batch transaction.

Figure 3.1-48. Use Case: Add Incident—Batch
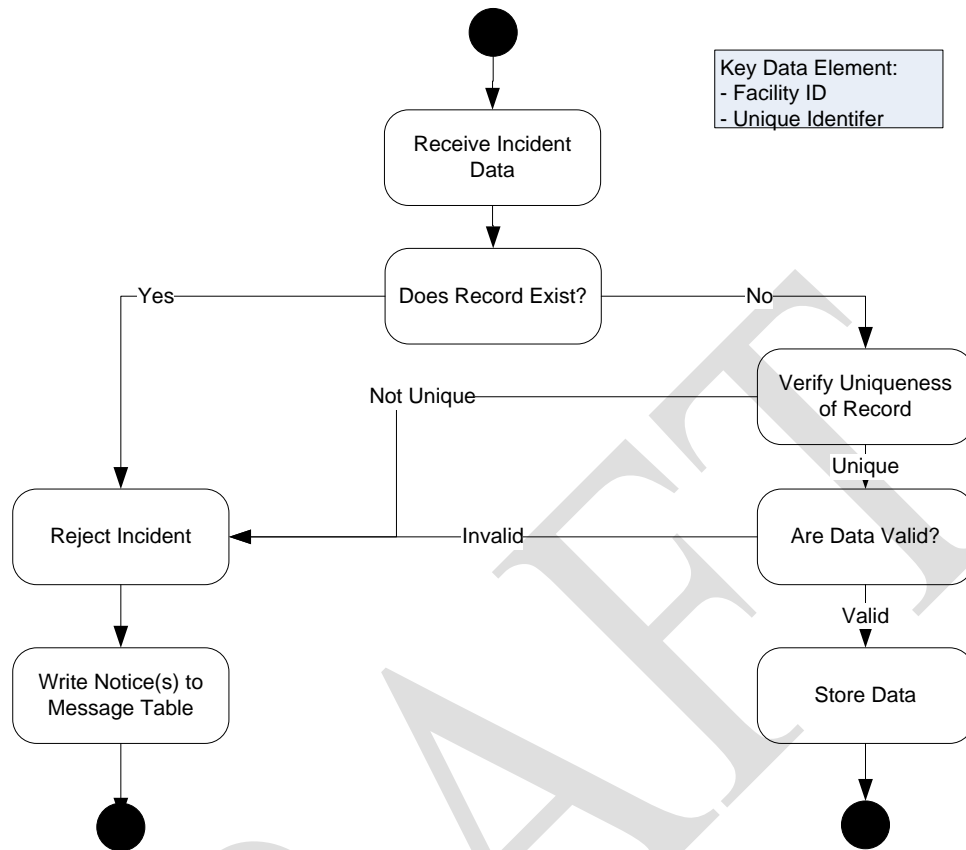
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.1.5.3, Incident Data Requirements, and Section 3.1.5.4, Incident Business Rules, for more details.

Figure 3.1-49 illustrates the processing required for adding an Incident in ICIS-Air online.

Figure 3.1-49. Use Case: Add Incident - Web
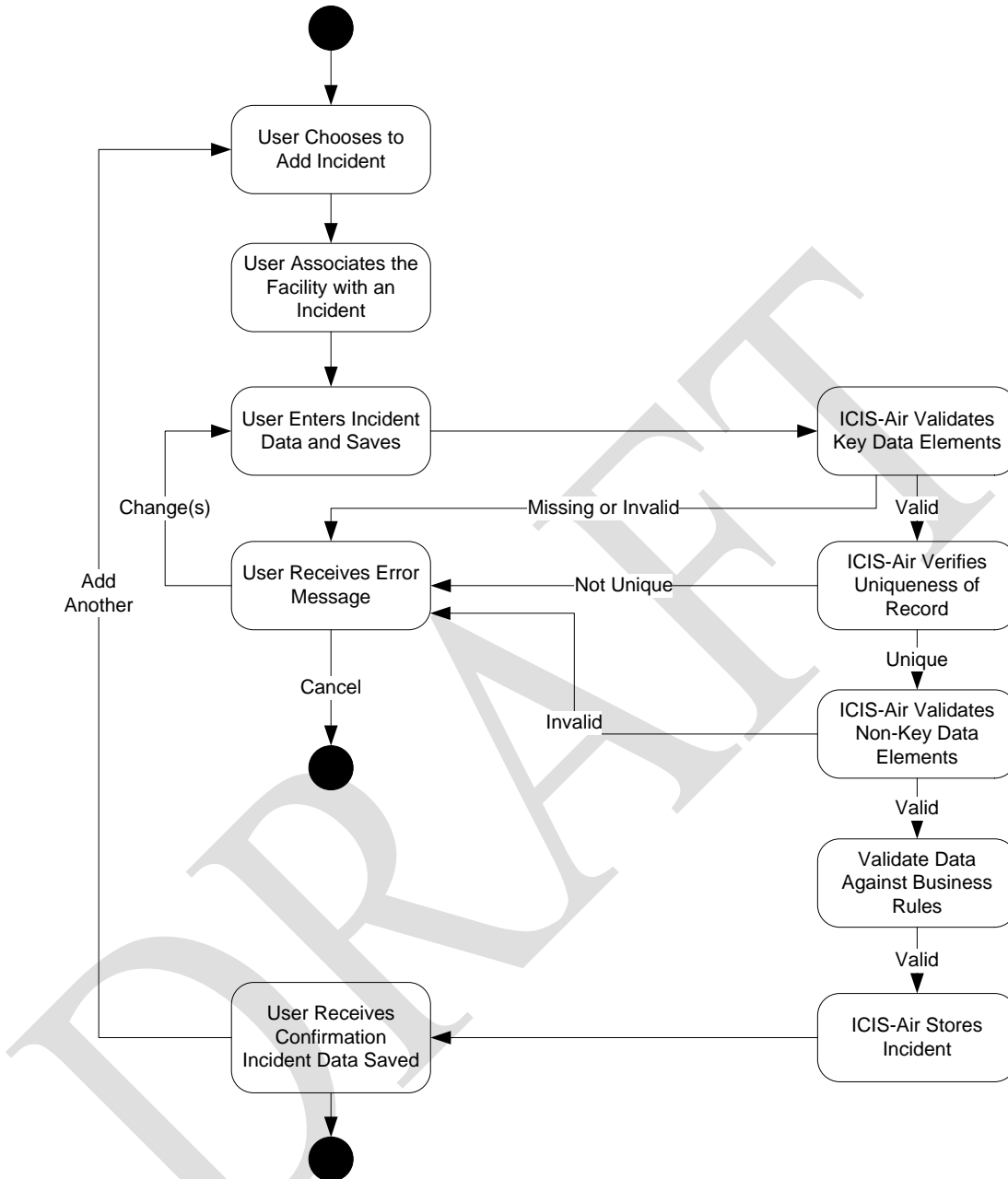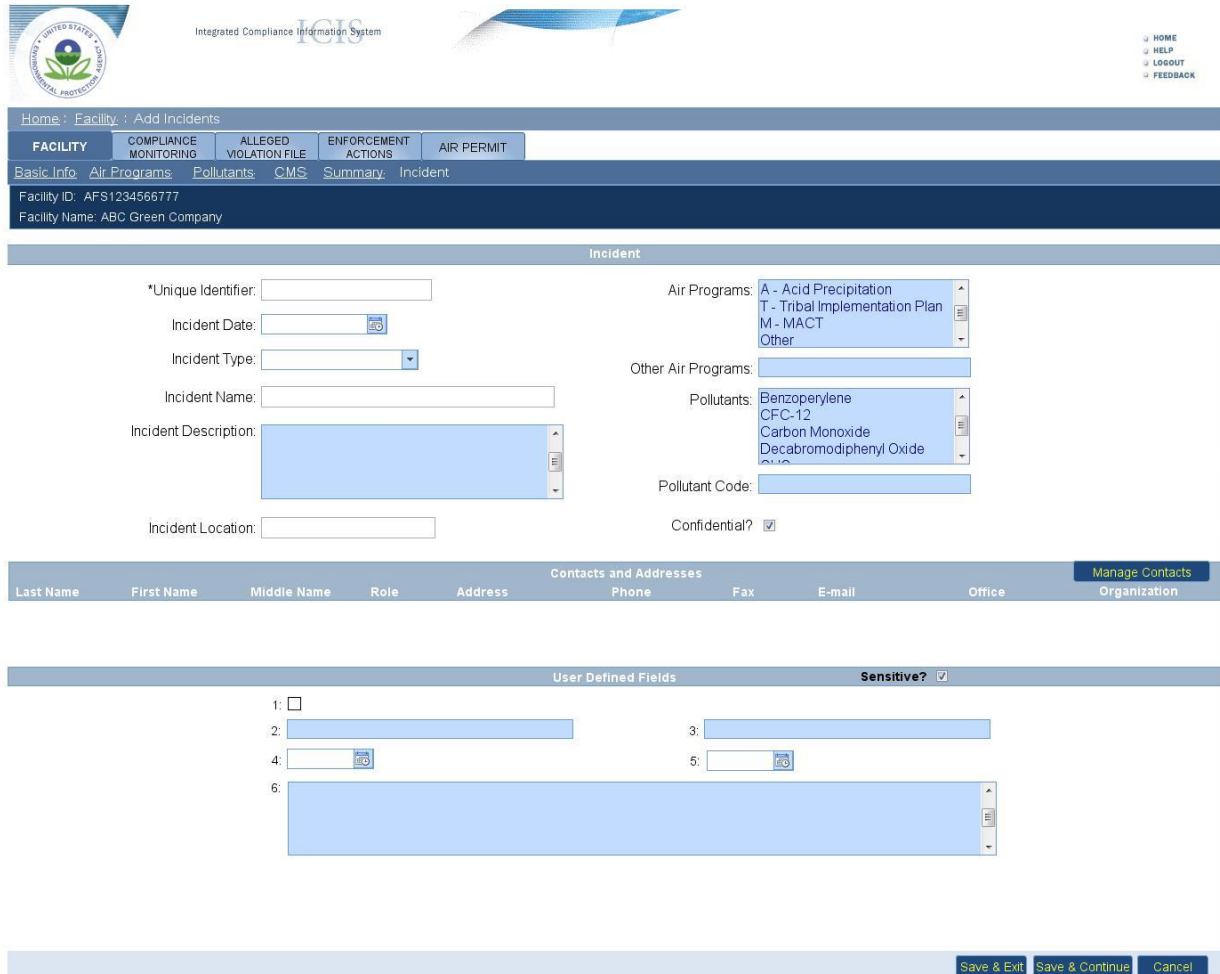
Figure 3.1-50 shows the Notional Add Incident screen.

Figure 3.1-50. Notional Screen: Add Incident

3.1.5.6   Edit Incident

Users can edit an Incident within the current view of an Incident. The Edit Incident transaction allows users to change Incident data that are not system generated and are not key data elements.

Users can edit any Incident data elements except for the following:

- Incident Unique Identifier
- Facility ID

Incident Identifier and Facility ID are the key data elements for an Incident and cannot be edited.

Batch

Batch users will have an Edit Incident transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.1.5.3 and business rules in Section 3.1.5.4 for more details on rejecting traditional Incident edit transactions.

Figure 3.1-51. Use Case: Edit Incident—Batch illustrates the processing required for editing an Incident in ICIS-Air through a batch transaction.

Figure 3.1-51. Use Case: Edit Incident—Batch
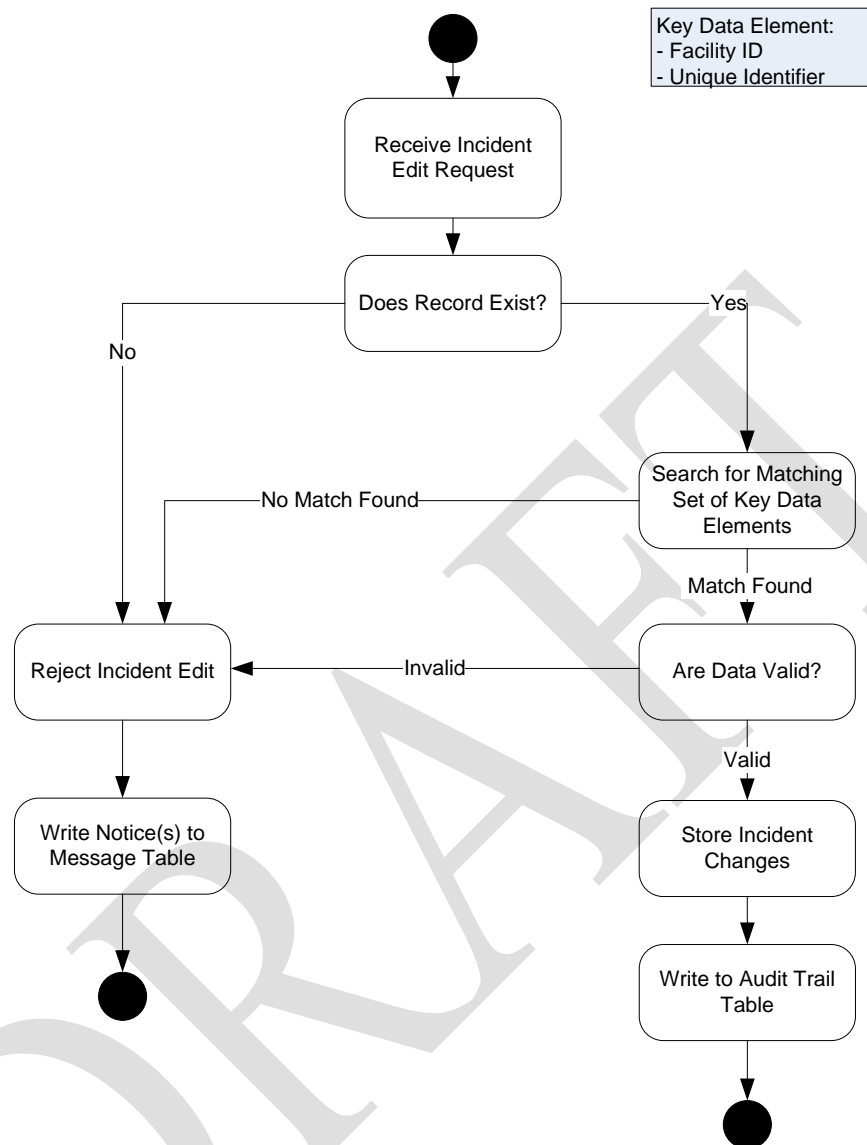
Key Data Element:
- Facility ID
- Unique Identifier

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.1.5.3, Incident Data Elements, and Section 3.1.5.4, Incident Business Rules, for more details.

Users may edit an Incident by accessing the List Incident screen, selecting the radio button of the desired Incident, and clicking on the Edit button. ICIS-Air will display the Edit Incident screen for the selected Incident.

Figure 3.1-52. Use Case: Edit Incident—Web illustrates the processing required for editing an Incident in ICIS-Air online.

Figure 3.1-52. Use Case: Edit Incident—Web
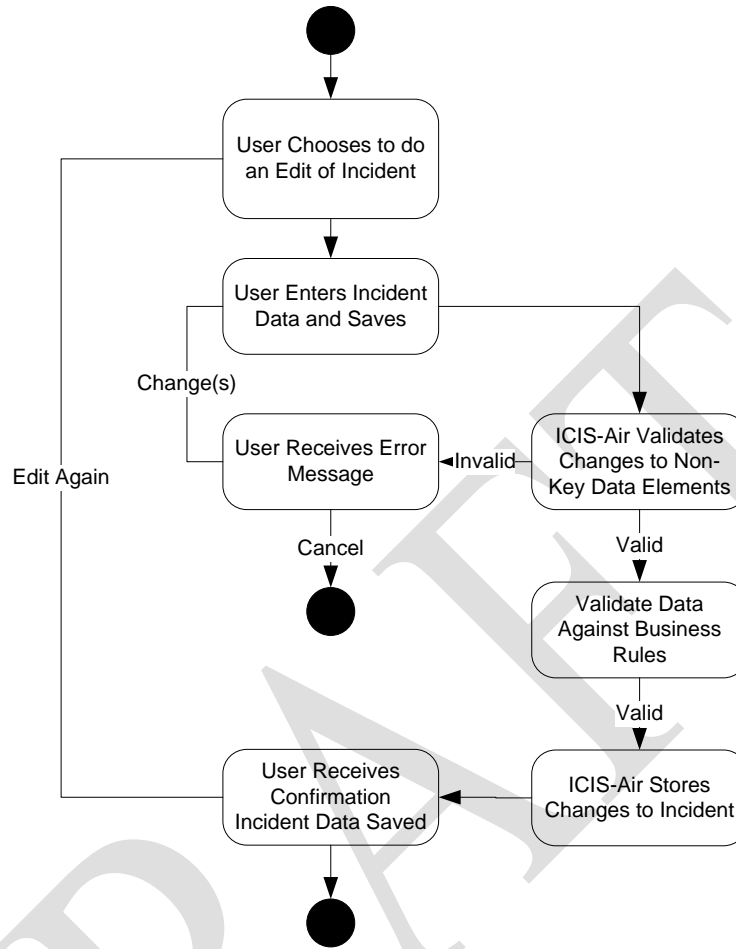
Figure 3.1-53. Notional Screen: Edit Incident shows the Notional Edit Incident screen.

Figure 3.1-53. Notional Screen: Edit Incident

3.1.5.7   Delete Incident

When a user deletes an Incident, all linkages to associated records will be deleted for that Incident. There are no restrictions on a user's ability to delete an Incident except for the security permissions.

Batch

Batch users will have Delete Incident transactions rejected if the record does not exist, or the business rules are violated.

Figure 3.1-54 illustrates the processing required for deleting an Incident from ICIS-Air through a batch transaction.

Figure 3.1-54. Use Case: Delete Incident—Batch
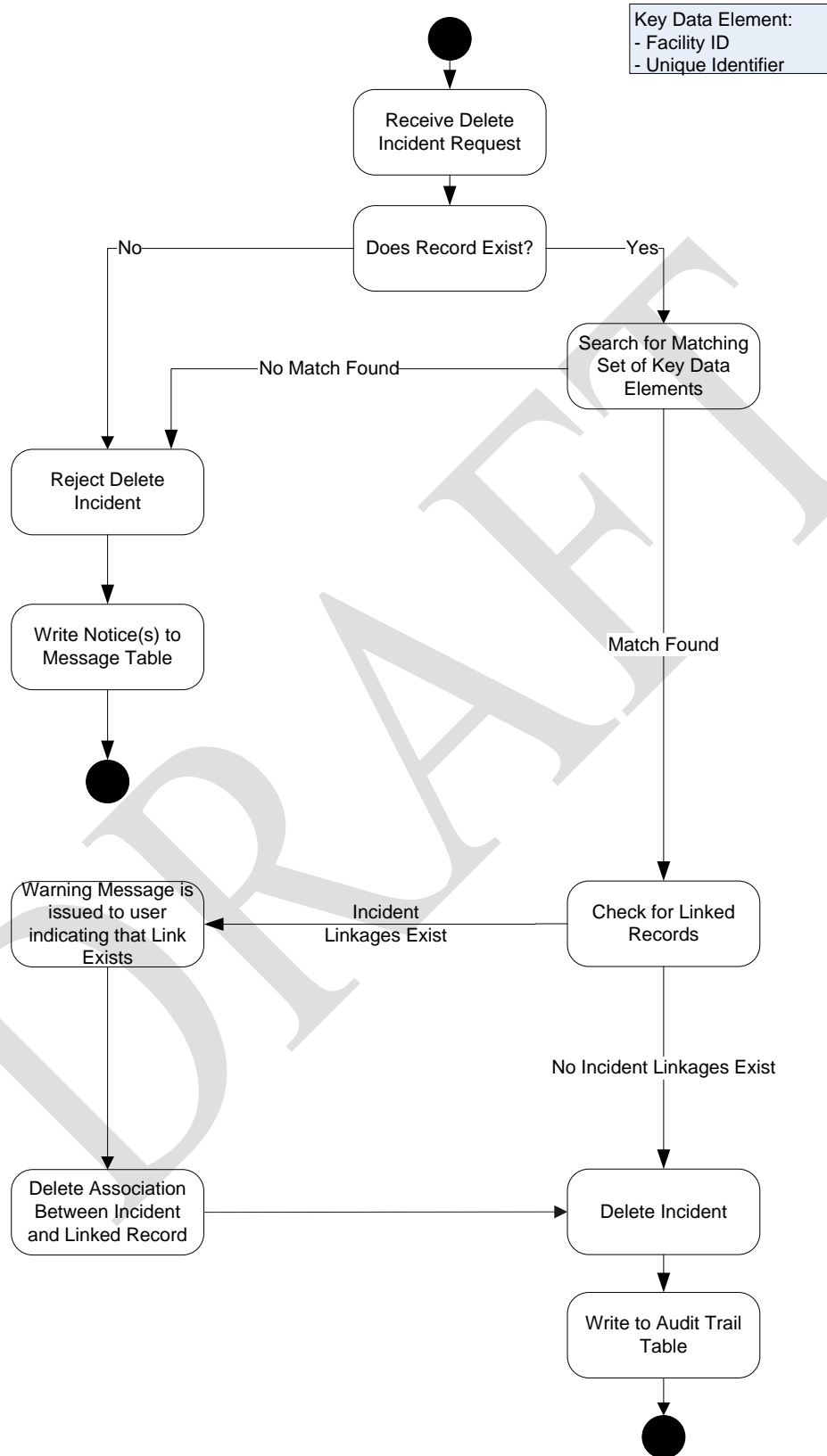
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Users may delete an Incident by searching for the Incident, accessing the List Incident screen, selecting the radio button of the Incident they wish to delete, and clicking on the Delete button.

Figure 3.1-55 illustrates the processing required for deleting an Incident from ICIS-Air online.

Figure 3.1-55. Use Case: Delete Incident—Web
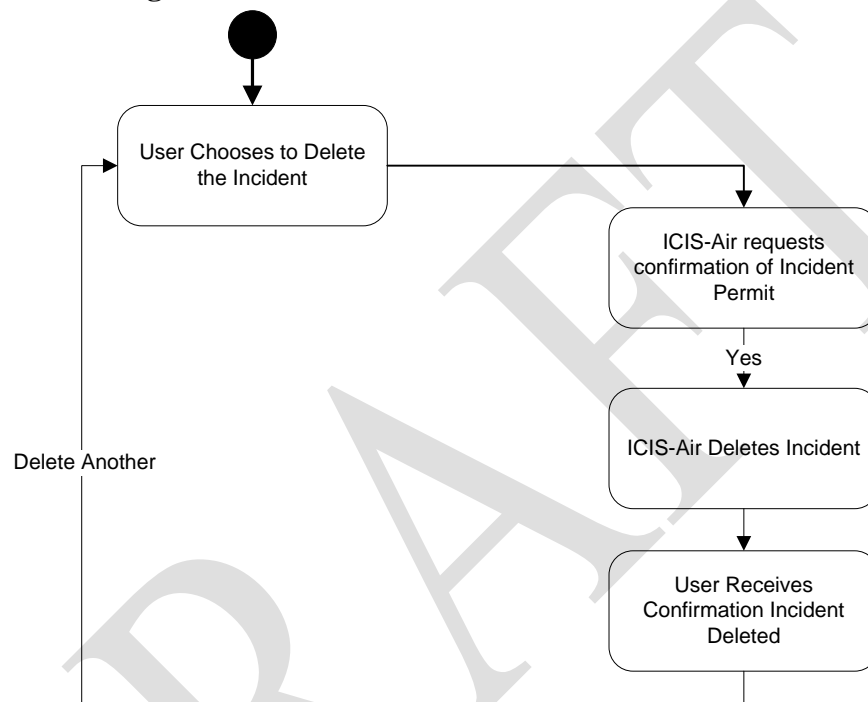
3.1.5.8   Search Incidents

Users will be able to view a list of all Incidents. Users will access this screen by searching. ICIS-Air will then display the List Incident screen populated with a list of all Incidents, in a predetermined sort order that meet the search criteria.

Note that the 'CAA Only' field will default to Air Incidents if the user is a State air user without NPDES privileges or an LCON user.

Figure 3.1-56. Notional Screen: Search Incident: Air

From the Incidents List screen, users can perform the following operations:

- Add Incident
- Edit Incident
- Delete Incident.

Figure 3.1-57 shows the user interface for viewing a list of all Incidents.

Figure 3.1-57. Notional Screen: List Incidents

3.2   COMPLIANCE MONITORING OVERVIEW

Compliance Monitoring is one of the key components the Agencies use to ensure that the regulated community conforms to environment laws and regulations through evaluations, investigations, or reviews of information required by EPA.

The following Compliance Monitoring activities will be included in ICIS-Air:

- Full Compliance Evaluations (FCE)
- Partial Compliance Evaluations (PCE)
- Investigations
- Information Requests
- Stack Tests
- Title V Annual Compliance Certifications (TV ACC)
- Continuous Emissions Monitoring (CEM) and Excess Emissions Reports (EER).

Requirements for each of the Compliance Monitoring activities will be discussed in detail in subsequent sections.

3.2.1   General Compliance Monitoring

This section provides the summary of modernization, functional requirements, and notional screens of the modernized system's functionalities that are common for all Compliance Monitoring activities.

3.2.1.1   *Summary of Compliance Monitoring Modernization in ICIS-Air*

Some Compliance Monitoring functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Different Screens and XML Schemas Based on Compliance Monitoring Activity Type**
  In mainframe AFS, users record all Compliance Monitoring data on the Plan Action screen. For the modernized system, users will enter data via different screens and XML schemas based on the type of Compliance Monitoring activity. A common set of screens and XML schema will be shared amongst the following list of Compliance Monitoring activities:
  – FCEs, PCEs, Investigations, and Information Requests
  – Stack Tests
  – TV ACCs
  – CEMs/EERs
- **Multiple Paths to Access Activities**
  In legacy AFS, Users must add, edit, or view Compliance Monitoring activities selecting the Facility and accessing the Facility screen prior to entering the Compliance Monitoring screens. In ICIS-Air, there will be multiple paths where users can view, edit, or add a Compliance Monitoring Activity. Users will be able to access the Compliance Monitoring Activity screen from:
  – Home Page
  – Facility screen

      −   List Compliance Monitoring Activity search results screen

      −   Add and Edit screens using the Add/Link Another option.

- **Import Electronic Data**

  ICIS-Air will import Compliance Monitoring data available electronically from the EPA's electronic reporting repository, assumed to be WebFIRE. The system will link the records to the electronic reports stored in the electronic reporting repository. Users will be able to edit the fields that were not electronically imported. ICIS-Air will notify specific Delegated Agencies when electronic data have been imported for their facilities

- **Standard Search Screen and Results**

  All Compliance Monitoring activities will share a Search screen with common search criteria to find existing records in the modernized system. The common List Compliance Monitoring Activities screen will display Compliance Monitoring search results based on the search criteria.

- **Linking/Unlinking to Other Activities**

  ICIS-Air will allow users to link Compliance Monitoring activities to other Compliance Monitoring activities, Alleged Violation Files, and Enforcement Actions as long as they are for the same Facility. The linking function will allow users to show that an Alleged Violation or Enforcement Action resulted from an FCE or that multiple related Compliance Monitoring activities were conducted against a single Facility. For example, several PCEs may be conducted against the same Facility on the same day. Alternatively, an Investigation may be conducted as a follow-up to a previous FCE or PCE. ICIS-Air will also allow users to unlink an activity from another Compliance Monitoring activity if necessary.

3.2.1.2   *General Compliance Monitoring Functional Requirements*

Table 3.2-1 lists the requirements that apply to general functions that are common for all Compliance Monitoring activities. It includes functions that are allowed and business rules within a function.

Table 3.2-1. ICIS-Air General Compliance Monitoring Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.1.5, 5.9.3, 5.10.3	EPA SRS	The system shall allow the user to search for Compliance Monitoring activities based on predefined search data elements: • Facility Information • Unique Identifier • All Activity Types • Individual Activity Types • Dates From • Dates To • Pollutants • Include Sensitive Data? • Stack Test – Test Results	ICIS-Air version 1.0
2.	5.1.5	EPA SRS	The system shall search on the Actual Start Date and Actual End Date for FCEs, PCEs, Investigations, and Information Requests based on the criteria entered for the From and To Dates on the Search screen.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
3.	5.1.5	EPA SRS	The system shall search on the Certification Period Start Date and End Date for TV ACCs based on the criteria entered for the From and To Dates on the Search screen.	ICIS-Air version 1.0
4.	5.1.5	EPA SRS	The system shall search on the Date Test Completed for Stack Tests based on the criteria entered for the From and To Dates on the Search screen.	ICIS-Air version 1.0
5.	5.1.5	EPA SRS	The system shall search on the Certification Date for CEMs based on the criteria entered for the From and To Dates on the Search screen.	ICIS-Air version 1.0
6.	5.1.5	EPA SRS	The system shall search on the Reporting Period Start Date and End Date for EERs based on the criteria entered for the From and To Dates on the Search screen.	ICIS-Air version 1.0
7.	5.9.3	EPA SRS	The system shall provide the user a list of search results that matches the search criteria for Compliance Monitoring activities.	ICIS-Air version 1.0
8.	N/A	N/A	The system shall allow the user to link a Compliance Monitoring record to one or more Compliance Monitoring record for the same Facility.	ICIS-Air version 1.0
9.	N/A	N/A	The system shall allow the user to unlink a Compliance Monitoring record from other Compliance Monitoring records.	ICIS-Air version 1.0
10.	N/A	N/A	The system shall allow the user to link a Compliance Monitoring record to one or more Enforcement Action records for the same Facility.	ICIS-Air version 1.0
11.	N/A	N/A	The system shall allow the user to unlink a Compliance Monitoring record from Enforcement Action records.	ICIS-Air version 1.0
12.	N/A	N/A	The system shall allow the user to link a Compliance Monitoring record to one or more Alleged Violation File records for the same Facility.	ICIS-Air version 1.0
13.	N/A	N/A	The system shall allow the user to unlink a Compliance Monitoring record from Alleged Violation File records.	ICIS-Air version 1.0

3.2.1.3   Search Compliance Monitoring—Web Only

Users will be able to view a list of all Compliance Monitoring records. Users will access this screen by clicking on the Search Compliance Monitoring Activities link from the Home Page. ICIS-Air will then display the List Compliance Monitoring Activities screen populated with a list of all Compliance Monitoring activities that matched the search criteria. Users will be able to sort the list by clicking on the column headings.

From the Compliance Monitoring Search Results screen, users will be able to perform the following operations:

- Add Compliance Monitoring
- View Compliance Monitoring
- Edit Compliance Monitoring
- Copy Compliance Monitoring
- Delete Compliance Monitoring.

Figure 3.2-1 shows the user interface for the Compliance Monitoring search screen.

Figure 3.2-1. Notional Screen: Search Compliance Monitoring

Figure 3.2-2 shows the user interface for viewing a list of all Compliance Monitoring activities that matched the search criteria.

Figure 3.2-2. Notional Screen: List Compliance Monitoring

3.2.1.4   Linking and Unlinking Activities

Users will have the ability to link and unlink the Compliance Monitoring activities, Alleged Violation Files, and Enforcement Actions together to show that the records are related. Once users have linked the activities, they can view a list of related activities that have already been linked. The List of Linked Activities screen will be blank for new Compliance Monitoring records. Figure 3.2-3 shows the related activities that have already been linked.

Figure 3.2-3. Notional Screen: List of Linked Activities

Users can click on the List More Eligible to Link button from the Related Compliance Monitoring activities screen to link Compliance Monitoring activities. Figure 3.2-4 shows the list of Compliance Monitoring activities eligible to be linked to a Compliance Monitoring record.

Figure 3.2-4. Notional Screen: List of Activities for Linking

3.2.2 Full Compliance Evaluations, Partial Compliance Evaluations, Investigations, and Information Requests

FCEs, PCEs, Investigations, and Information Requests are types of compliance monitoring activities performed to ensure a Facility's compliance to regulatory requirements. The functional, data, and business rules requirements are detailed in the subsequent sections for FCEs, PCEs, Investigations, and Information Requests.

An FCE is a comprehensive evaluation conducted by a regulatory authority to ensure the Facility meets its compliance requirements. It includes all regulated pollutants at all regulated emission units, and it addresses the compliance status of each unit, as well as the Facility's continuing ability to maintain compliance at each emission unit. An FCE includes reviews of required reports and the underlying records; assessments of air pollution control devices and operating conditions; observing visible emissions; a review of facility records and operating logs; assessments of process parameters, such as feed rates, raw material compositions, and process rates; and stack tests if there is no other way to determine compliance with the emission limits. An FCE can only occur once per day.

A PCE focuses on a subset of regulated pollutants, regulatory requirements, and/or emission units at a Facility to ensure compliance. The PCE activities result in a compliance determination. Multiple PCEs can occur on the same day to evaluate specific aspects of a Facility.

An Investigation is limited to a portion of a Facility, involving a more in-depth assessment of a particular issue. It usually is based on information discovered during an FCE, or as the result of a targeted industry, regulatory, or statutory initiative. An investigation may be for one or more than one Facility.

Section 114 letters or Information Requests serve as means for EPA to request information such as records, data, or sampling from any person who owns or operates any emission source or who is subject to any requirement of the CAA. Purposes of Section 114 letters are to provide advance notification of an inspection, to obtain information when a full-scale, on-site evaluation is not cost effective, or to facilitate the effectiveness of an evaluation, and in some cases to eliminate the need for an evaluation. Entering Information Requests records will be a new data entry requirement for Federal users only. The Information Requests functionalities will be available for optional data entry for Delegated Agency users.

The requirements, functionality, data elements, and business rules that support the processing of FCEs, PCEs, Investigations, and Information Requests are detailed in the following subsections.

3.2.2.1 Summary of FCEs, PCEs, Investigations, and Information Requests Modernization in ICIS-Air

Some Compliance Monitoring functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Different Screens for Federal and Delegated Agency Users**
  - Federal Users

    Federal ICIS-Air users will enter FCEs, PCEs, Investigations, and Information Requests using the existing FE&C screens with additional AFS data elements. FE&C pick list values that are related to the Air Program will be updated with the Air

Program values. Optional data elements on the FE&C screen that are not related to the Air Program will not need to be entered.

– Delegated Agency Users

Delegated Agency ICIS-Air users will enter the FCEs, PCEs, Investigations, and Information Requests using the screens specific to the Air Program.

- **Data Elements Mapping**

Some AFS data elements will be mapped to existing FE&C data elements. The table below indicates any updated nomenclature for data elements in AFS mapped to the FE&C data elements, which follow the EPA data standards. System required data elements are marked with an asterisk (*).

Table 3.2-2. Legacy AFS Data Elements Mapped to ICIS-Air Data Elements

Legacy AFS Data Elements	ICIS-Air Data Elements
*Compliance Monitoring Activity Type Valid values: – Full Compliance Evaluations (FCEs) – Partial Compliance Evaluations (PCEs) – Investigations – Section 114 Letter	Compliance Monitoring Activity Type Valid values: – Inspection/Evaluation (For Federal users) – Evaluation (For Delegated Agency users) – Investigation – Information Request
*PCE Action Description: – Complaint Partial Compliance Evaluation – Permit Partial Compliance Evaluation – Process Partial Compliance Evaluation – Partial Compliance Evaluation On-Site Observation *FCE Action Description: – Full Compliance Evaluation	*Compliance Monitoring Type If Federal Statutes is CAA, then CM Type: – Full Compliance Evaluation On-Site – Full Compliance Evaluation Off-Site – Partial Compliance Evaluation On-Site – Partial Compliance Evaluation Off-Site – Case Development – Citizen Compliant – Field Screening Sample – Follow-Up – Motor Vehicle/Engine – Non-Financial Record Review – Oversight – Wood Heater Evaluation
PCE Type: – Site Visits – Conferences – Review of Required Reports – Compliance Reviews of Individual Air Programs – Emission Inventory reviews – RATA Review – Other activities	PCE Type: – Site Visits – Conferences – Review of Required Reports – Compliance Reviews of Individual Air Programs – Emission Inventory reviews – RATA Review – Other activities
Compliance Monitoring Activity Name	*Compliance Monitoring Activity Name (Required for Federal users only)
*Facility ID	*Facility ID
Lead Agency – State – EPA – Tribe – Local Government	Which party had the lead? – U.S. EPA – State – Tribe – Local Government –

Legacy AFS Data Elements	ICIS-Air Data Elements
*On or Off Site	(See Compliance Monitoring Type)
*Air Programs Reviewed	*Air Programs
*Initiated Date (Enforcement Sensitive for Investigations)	Actual Start Date (Enforcement Sensitive for the Air Program's Investigations on both Federal and State screens)
*Date of Evaluation	Actual Start Date & Actual End Date
Date Scheduled	Planned Start Date
*Date Achieved	Actual End Date
Pollutants Involved	Pollutants Involved
Part of National Initiatives	National Priority
State Priority	State Priority will be a new data element
Link to Report	Link to Report will be a new data element

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Compliance Monitoring in ICIS-Air.

3.2.2.2   FCEs, PCEs, Investigations, and Information Requests Functional Requirements

Table 3.2-3 lists the requirements that apply to FCEs, PCEs, Investigations, and Information Requests. It includes functions that are allowed and business rules within a function.

Table 3.2-3. ICIS-Air FCEs, PCEs, Investigations, and Information Requests Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.1, 5.5.4, 5.9.1, 5.9.5, 5.9.6	EPA SRS	The system shall allow the user to view the following Inspection/Evaluation Compliance Monitoring data: • Full Compliance Evaluation On-Site • Full Compliance Evaluation Off-Site • Partial Compliance Evaluation On-Site • Partial Compliance Evaluation Off-Site	ICIS-Air version 1.0
2.	5.5.1, 5.5.4, 5.9.1, 5.9.10	EPA SRS	The system shall allow the user to view Investigation Compliance Monitoring data.	ICIS-Air version 1.0
3.	5.5.1, 5.5.4, 5.9.1	EPA SRS	The system shall allow the user to view Information Request Compliance Monitoring data.	ICIS-Air version 1.0
4.	5.9.1, 5.9.5, 5.9.6	EPA SRS	The system shall allow the user to add the following Inspection/Evaluation Compliance Monitoring data: • Full Compliance Evaluation On-Site • Full Compliance Evaluation Off-Site • Partial Compliance Evaluation On-Site • Partial Compliance Evaluation Off-Site	ICIS-Air version 1.0
5.	5.9.1, 5.9.10	EPA SRS	The system shall allow the user to add Investigation Compliance Monitoring data.	ICIS-Air version 1.0
6.	5.9.1, 5.9.10	EPA SRS	The system shall allow the user to add Information Request Compliance Monitoring data.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
7.	5.9.1, 5.9.5, 5.9.6	EPA SRS	The system shall allow the user to edit the following Inspection/Evaluation Compliance Monitoring data: • Full Compliance Evaluation On-Site • Full Compliance Evaluation Off-Site • Partial Compliance Evaluation On-Site • Partial Compliance Evaluation Off-Site	ICIS-Air version 1.0
8.	5.9.1, 5.9.10	EPA SRS	The system shall allow the user to edit Investigation Compliance Monitoring data.	ICIS-Air version 1.0
9.	5.9.1, 5.9.10	EPA SRS	The system shall allow the user to edit Information Request Compliance Monitoring data.	ICIS-Air version 1.0
10.	5.9.1, 5.9.5, 5.9.6	EPA SRS	The system shall allow the user to delete the following Inspection/Evaluation Compliance Monitoring data: • Full Compliance Evaluation On-Site • Full Compliance Evaluation Off-Site • Partial Compliance Evaluation On-Site • Partial Compliance Evaluation Off-Site	ICIS-Air version 1.0
11.	5.9.11	EPA SRS	The system shall allow the user to delete Investigation Compliance Monitoring data.	ICIS-Air version 1.0
12.	5.9.11	EPA SRS	The system shall allow the user to delete Information Request Compliance Monitoring data.	ICIS-Air version 1.0
13.	5.4.1, 5.4.4, 5.9.5, 5.9.6, 5.9.10, 5.32.1	EPA SRS, SME Meeting	The system shall display the following data elements on the Inspection/Evaluation, Investigation, and Information Request screens for Federal Users: • Compliance Monitoring Activity Type • Compliance Monitoring Activity Name • Region • Facility ID • Planned Start Date • Planned End Date • Actual Start Date • Actual End Date • Federal Statutes • Law Sections • Programs • Compliance Monitoring Types • Compliance Monitoring Action Reason • Compliance Monitoring Agency Type • Compliance Monitoring Agency Name • If State, Local or Tribal lead, did EPA Assist? • Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? • If Joint, what was the purpose of the participation of the other party? • Which party had the lead? • Did you observe deficiencies (potential violations) during the on-site Inspection? If yes, Deficiencies observed • If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? • Did you observe the Facility take any actions during	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			the inspection to address the deficiencies noted? If yes, Actions taken	
			• Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during inspections?	
			• Air Pollutant	
			• Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the Inspection?	
			• Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the Inspection?	
			• Link to Document	
			• Contacts:	
			– Role	
			– First Name	
			– Last Name	
			– Middle Name	
			– Address	
			– City	
			– State	
			– Zip Code	
			– Phone	
			– Fax	
			– E-mail	
			– Office	
			– Organization	
			• NAICS Codes	
			• SIC Codes	
			• OECA National Priority	
			• Regional Priority	
			• Multimedia Indicator	
			• Compliance Monitoring Action Outcome	
			• Compliance Monitoring Rating Code	
			• Comments	
			– Comment	
			– Entered On	
			– Entered By	
			– Sensitive?	
			• Federal Facility Activity	
			• Federal Facility Activity Comment	
			• User Defined Field 1	
			• User Defined Field 2	
			• User Defined Field 3	
			• User Defined Field 4	
			• User Defined Field 5	
			• User Defined Field 6	

ID	Client Req ID	Source Reference	Requirement	Planned Release
			Additional optional FE&C data elements displayed are: If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method • Water Pollutants • Media Monitored • Number of Days Physically Conducting Activity • Number of Hours Physically Conducting Activity	

14.	5.4.1,
	5.4.4,
	5.9.5,
	5.9.6,
	5.9.10,
	5.15.1,
	5.15.2
		EPA SRS,
		SME
		Meeting
			The system shall display the following data elements on the Inspection/Evaluation, Investigation, and Information Request screens for Delegated Agency users:
			• Compliance Monitoring Activity Type
			• State/LCON
			• Compliance Monitoring Activity Name
			• Compliance Monitoring Type
			• Partial Compliance Evaluation Type
			• Facility ID
			• Planned Start Date
			• Planned End Date
			• Actual Start Date
			• Actual End Date
			• Federal Statutes
			• Air Programs
			• Other Air Programs
			• Pollutants Involved
			• Were deficiencies found?
			• Link to Document
			• Contacts:
			  – Role
			  – First Name
			  – Last Name
			  – Middle Name
			  – Address
			  – Phone
			  – Fax
			  – E-mail
			  – Office
			  – Organization
			• Who Conducted?
			• Multimedia Indicator
			• National Priority
			• Regional Priority
			• State Priority
			• Compliance Monitoring Comments
			• User Defined Field 1
			• User Defined Field 2
			• User Defined Field 3
			• User Defined Field 4
			• User Defined Field 5
			• User Defined Field 6
				ICIS-Air version 1.0

15.	5.4.1,	EPA SRS	The system shall not display the following data elements on	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
	5.32.1		the Investigation screen for Federal users: • Did you observe deficiencies (potential violations) during the on-site Inspection • Deficiencies observed • If you observed deficiencies, did you communicate the deficiencies to the Facility during the Inspection? • Did you observe the Facility take any actions during the inspection to address the deficiencies noted? • If yes, what actions were taken? • Water Pollutants • Air Pollutants • Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during inspections? • Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the Inspection?	
16.	N/A	N/A	The system shall enforce the security model for the users to view, add, edit, and delete an FCE, PCE, Investigation, or Information Request. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
17.	5.9.10	EPA SRS	The system shall enforce the security model for users with enforcement sensitive privileges to view and edit data elements listed below. Refer to ICIS-Air Security Requirements. • Investigation Planned Start Date • Investigation Actual State Date • FCE/PCE Planned Start and End Dates if Actual Start and End Dates are not present	ICIS-Air version 1.0
18.	N/A	SME Meeting	The system shall allow the user to enter multiple comments for a FCE, PCE, Investigation, and Information Request record.	ICIS-Air version 1.0
19.	N/A	SME Meeting	The system shall allow the user to unlink a FCE, PCE, Investigation, or Information Request from one or more Alleged Violations.	ICIS-Air version 1.0
20.	5.9.5, 5.9.6, 5.9.10	EPA SRS	The system shall allow the user to enter zero to many government contacts and addresses information.	ICIS-Air version 1.0
21.	N/A	N/A	The system shall display the Federal, LCON, and State label dynamically on the Delegated Agency screen based on the user's profile.	ICIS-Air version 1.0
22.	N/A	N/A	The system shall display the values for Federal, LCON, and State dynamically on the Delegated Agency screen based on the user's profile.	ICIS-Air version 1.0

3.2.2.3 *FCEs, PCEs, Investigations, and Information Requests Data Requirements*

Table 3.2-4 lists the data element requirements that apply to Compliance Monitoring. This table includes the system, minimum data requirements, and possible future data elements. The AFS or FE&C column indicates whether the data element applies to AFS or FE&C or both AFS and FE&C. The AFS Federal or Delegated Agency column indicates whether the data element will be available to the AFS federal users or the AFS Delegated Agency users or both federal and Delegated Agency users. Note: References to REF tables are place holders and values for the REF tables will be reviewed during the Design phase.

Table 3.2-4. ICIS-Air FCEs, PCEs, Investigations, and Information Requests Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
1.	Y	Y	Y	N	5.9.1	AFS/FE&C	Federal/ Delegated Agency	Unique Identifier • User Defined or System Generated • Alphanumeric (15)
2.	N	Y	Y	Y	5.9.1	AFS/FE&C	Federal/ Delegated Agency	Compliance Activity Type • Valid Values: • Inspection/Evaluation • Investigation • Information Request
3.	N	F	N	N	N/A	AFS/FE&C	Federal/ Delegated Agency	Compliance Monitoring Activity Name • Alphanumeric (100) • Free-form text • Required for Federal, not required for Delegated Agency
4.	N	Y	Y	Y	N/A	AFS/FE&C	Federal	Region • Pick List • Must be validated against REF_REGION table
5.	N	N	Y	Y	N/A	AFS	Federal/Delegated Agency	Federal, LCON, or State • Defaults to EPA, LCON, State values based on user's profile (Delegated Agency) • If State User with LCON Access enters LCON record, LCON is required if more than one LCON exists for that State
6.	N	Y	Y	N	N/A	AFS/FE&C	Federal/ Delegated Agency	Facility ID • Foreign Key of Linked Facility

7.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Planned Start Date
								• Date
								  – Batch: Must be valid date in yyyy-mm-dd format
								  – Web: Must be valid date in mm/dd/yyyy format

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement

8.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Planned End Date
								• Date
								  – Batch: Must be valid date in yyyy-mm-dd format
								  – Web: Must be valid date in mm/dd/yyyy format

9.	N	N	F(Inv)	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Actual Start Date
								• Date
								  – Batch: Must be valid date in yyyy-mm-dd format
								  – Web: Must be valid date in mm/dd/yyyy format

10.	N	N	Y	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Actual End Date
								• Date
								  – Batch: Must be valid date in yyyy-mm-dd format
								  – Web: Must be valid date in mm/dd/yyyy format

11.	N	Y	F	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Federal Statutes: • Pick list • Must be validated against REF table • System Generated to CAA (for Delegated Agency users, or Federal users entering Delegated Agency records)
12.	N	Y	F	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal	Law Sections: • Multiselect • Dynamically populated based on Federal Statutes selected • Must be validated against REF_LAW_SECTION table
13.	N	Y	Y	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Programs/Air Programs • Multiselect • Dynamically populated based on Federal Law Sections (Federal) • Defaults to Clean Air Act programs (for Delegated Agency users, or Federal users entering Delegated Agency records) • Must be validated against REF_PROGRAM table

14.	N	Y	Y	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Compliance Monitoring Type
								• When Compliance Activity Type is Inspection/Evaluation and Federal Statute is CAA, the values are-
								  – Full Compliance Evaluation On-Site
								  – Full Compliance Evaluation

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
								Off-Site – Partial Compliance Evaluation On-Site – Partial Compliance Evaluation Off-Site – Case Development – Citizen Complaint – Field Screening Sample – Follow-Up – Motor Vehicle/Engine – Non-Financial Record Review – Oversight – Wood Heater Evaluation • When Compliance Activity Type is Investigation and Federal Statute is CAA, the value is- – Investigation • When Compliance Activity Type is Information Request and Federal Statute is CAA, the value is- – Information Request Letter (114 Letter)
15.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS	Federal/ Delegated Agency	PCE Type • Multiselect • When any Partial Compliance Evaluation is selected under Compliance Monitoring Type, the values are- – Site Visits – Review of Required Reports – Compliance Reviews of individual Air Programs – Emission Inventory reviews – Other activities
16.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS	Federal/ Delegated Agency	Pollutants Involved • Multiselect • Must be validated against REF_POLLUTANT table for Air Pollutants
17.	N	N	N	N	N/A	AFS/FE&C	Federal	If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method • Valid Values: – Discrete Acute – Discrete Chronic – Discrete Method – Flow-Through Method – Flow-Through Acute

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
								– Flow-Through Chronic

18.	N	F	N	N	N/A	AFS/FE&C	Federal	Compliance Monitoring Action Reason
								• Valid Values:
								  – Agency Priority
								  – Citizen Complaint/Tip
								  – Core Program
								  – Selected Monitoring Action
								• Required for Federal users, not required for Delegated Agency users

19.	N	F	N	N	N/A	AFS/FE&C	Federal	Compliance Monitoring Agency Type:
								• Valid Values:
								  – U.S. EPA
								  – State
								  – Tribe
								  – Local Government
								• Default value based on User Profile

20.	N	N	N	N	N/A	AFS/FE&C	Federal	Compliance Monitoring Agency Name: • Must be validated against REF_AGENCY table

21.	N	N	N	N	N/A	AFS/FE&C	Federal	If State, Local or Tribal lead, did EPA Assist?
								• Alphanumeric (1)
								• Valid Values:
								  – N (Default)
								  – Y
								• Cannot be blank if any value except EPA is selected under CM Agency Type

22.	N	N	N	N	N/A	AFS/FE&C	Federal	Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity?
								• Valid Values:
								  – State
								  – Federal
								  – Joint (State/Federal)

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
23.	N	N	N	N	N/A	AFS/FE&C	Federal	If Joint, what was the purpose of the participation of the other party? • Valid Values: – True joint inspection, with EPA and the State – Oversight Purposes – Training Purposes – Assist the State • Must be entered if Joint is selected for the question, Was this a State, Federal, or Joint (State/Federal) Inspection?
24.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal	Which party had the lead? • Valid Values: – U.S. EPA – State – Tribe – Local Government • Must be entered if Joint is selected for the question, Was this a State, Federal, or Joint (State/Federal) Inspection?
25.	N	N	N	N	N/A	AFS/FE&C	Federal	Did you observe deficiencies (potential violations) during the on-site Inspection? If yes, Deficiencies observed • Alphanumeric (1) • Valid Values: – N (Default) – Y • Not applicable for Investigations
26.	N	N	N	N	N/A	AFS/FE&C	Federal	Deficiencies • Multiselect • Must be validated against REF_DEFICIENCY table • Must be entered if Yes was selected for Question 1 • Cannot be entered if No was selected for Question 1 • Not applicable for Investigations

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement

27.	N	N	N	N	N/A	AFS/FE&C	Federal	If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection?
								• Valid Values:
								  – Yes
								  – No
								• Must be entered if Yes was selected for Question 1
								• Cannot be entered if No was selected for Question 1
								• Not applicable for Investigations

28.	N	N	N	N	N/A	AFS/FE&C	Federal	Did you observe the Facility take any actions during the inspection to address the deficiencies noted?
								• Valid Values:
								  – Yes (i.e., the Facility took actions or was observed to have taken action)
								  – No (i.e., the Facility did not take action or was not observed to have taken action)
								• Must be entered if Yes was selected for Question 2
								• Cannot be entered if No was selected for Question 2
								• Not applicable for Investigations

29.	N	N	N	N	N/A	AFS/FE&C	Federal	If yes, corrective action taken? • Multiselect • Must be validated against REF_CORRECTIVE_ACTION table • Must be entered if Yes was selected for Question 3 • Cannot be entered if No was selected for Question 3 • Not applicable for Investigations
30.	N	N	N	N	N/A	AFS/FE&C	Federal	Water Pollutants • Multiselect • Must be validated against REF_POLLUTANT table • Must be entered if Federal Statute selected is CWA-Clean Water Act and one of the corrective actions selected is Reduced Pollution • Not applicable for Investigations

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
31.	N	N	N	N	5.9.6, 5.9.10	AFS/FE&C	Federal	Air Pollutants • Multiselect • Must be validated against REF_POLLUTANT table • Must be entered if Federal Statute selected is CAA-Clean Air Act and one of the corrective actions selected is Reduced Pollution
32.	N	N	N	N	N/A	AFS/FE&C	Federal	Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during inspections? • Alphanumeric (1) • Valid Values: – N (Default) – Y
33.	N	N	N	N	N/A	AFS/FE&C	Federal	Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the Inspection? • Alphanumeric (1) • Valid Values: – N (Default) – Y
34.	N	N	N	N	N/A	AFS	Delegated Agency	Were deficiencies found? • Alphanumeric (1) • Valid Values: – Blank (Default) – N – Y
35.	N	N	N	N	N/A	AFS	Delegated Agency	Who Conducted? • Valid Values: – U.S. EPA – State – LCON – Tribe – Local Government • Defaults based on user's profile
36.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS	Federal/ Delegated Agency	Link to Document • URL to Document

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement

37.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Contacts Role Type
								• Valid Values:
								  – Case Developer
								  – Inspector
								  – Paralegal
								  – Tenant

38.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Contacts ID • Must be validated against Contacts table
39.	N	N	N	N	N/A	AFS/FE&C	Federal	NAICS Codes • Multiselect • Must be validated against REF_NAICS table
40.	N	N	N	N	N/A	AFS/FE&C	Federal	SIC Codes • Multiselect • Must be validated against REF_SIC table
41.	N	N	N	N	N/A	AFS/FE&C	Federal/ Delegated Agency	OECA National Priority • Multiselect • Must be validated against REF_PRIORITY table •
42.	N	N	N	N	N/A	AFS/FE&C	Federal/ Delegated Agency	Regional Priority • Multiselect • Must be validated against REF_PRIORITY table • Dynamic based on current fiscal year priorities affiliated with that region (Region or State field)
43.	N	N	N	N	N/A	AFS	Delegated Agency	State Priority • Alphanumeric (200) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
44.	N	N	N	N	N/A	AFS/FE&C	Federal	Media Monitored • Valid Values: – Air – Animals – Human – Land – Plants – Schools/Housing – Soil – Water (drinking) – Water (ground) – Water (sediment) – Water (biosolids and other sludges) – Water (navigable) – Water (wastewater to or from POTW) – Water (wetlands)
45.	N	N	N	N	N/A	AFS/FE&C	Federal/ Delegated Agency	Multimedia Indicator • Alphanumeric (1) • Valid Values: – N (Default) – Y
46.	N	N	N	N	N/A	AFS/FE&C	Federal	Number of Days Physically Conducting Activity • Numeric (15) • Must be a whole number
47.	N	N	N	N	N/A	AFS/FE&C	Federal	Number of Hours Physically Conducting Activity • Numeric (15) • Must be a whole number
48.	N	N	N	N	N/A	AFS/FE&C	Federal	Compliance Monitoring Action Outcome • Valid Values: – Administrative – Immediately Corrected – Judicial – No Compliance Monitoring (Access Denied) – No Compliance Monitoring (Facility Shut Down) – No Violation – Not Immediately Corrected – Notice of Determination – Under Review

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement
49.	N	N	N	N	N/A	AFS/FE&C	Federal	Compliance Monitoring Rating Code • Valid Values: – Satisfactory – Marginal – Unsatisfactory – Unrated
50.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	Comments • Multiple for a Compliance Monitoring record • Alphanumeric (500) • Free-form text
51.	N	N	N	Y	N/A	AFS/FE&C	Federal/ Delegated Agency	Comment Entered On • Date • System generated
52.	N	N	N	Y	N/A	AFS/FE&C	Federal/ Delegated Agency	Comment Entered By • Alphanumeric (50) • System generated
53.	N	N	N	N	N/A	AFS	Delegated Agency	Sensitive Comment • Alphanumeric (1) • Valid Values: – N – Y (Default)
54.	N	N	N	N	N/A	AFS/FE&C	Federal	Federal Facility Activity • Valid Values: – Federal Facility – No Federal Facility Involvement – Non-Federal Party Impacting Federal Property
55.	N	N	N	N	N/A	AFS/FE&C	Federal	Federal Facility Activity Comment • Alphanumeric (250) • Free-form text
56.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
57.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	User Defined Field 2 • Alphanumeric (100) • Free-form text
58.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	User Defined Field 3 • Alphanumeric (100) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	AFS or FE&C	Federal or Delegated Agency	Requirement

59.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	User Defined Field 4
								• Date
								  – Batch: Must be valid date in yyyy-mm-dd format
								  – Web: Must be valid date in mm/dd/yyyy format

60.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	User Defined Field 5
								• Date
								  – Batch: Must be valid date in yyyy-mm-dd format
								  – Web: Must be valid date in mm/dd/yyyy format

61.	N	N	N	N	5.9.5, 5.9.6, 5.9.10	AFS/FE&C	Federal/ Delegated Agency	User Defined Field 6 • Alphanumeric (500) • Free-form text
62.	N	N	N	N	N/A	AFS	Delegated Agency	Other Air Programs • Alphanumeric (100) Free-form text

63.	N	N	N	N	N/A	AFS	Delegated Agency	UDF Sensitive Flag
								• Alphanumeric (1)
								• Valid Values:
								  – N
								  – Y (Default)

64.	N	N	N	Y	N/A	AFS/FE&C	Federal/ Delegated Agency	Created By System Generated based upon User ID
65.	N	N	N	Y	N/A	AFS/FE&C	Federal/ Delegated Agency	Created Date • System Generated Date
66.	N	N	N	Y	N/A	AFS/FE&C	Federal/ Delegated Agency	Last Modified By System Generated based upon User ID
67.	N	N	N	Y	N/A	AFS/FE&C	Federal/ Delegated Agency	Last Modified Date • System Generated Date

SR = System Required (Yes/Federal/No); PR = Programmatically Required (Yes/Federal/No); SG = System Generated (Yes/No).

3.2.2.4 *FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements*

Table 3.2-5 lists the business rules requirements that apply to FCEs, PCEs, Investigations, and Information Requests. This table includes the business rules for data elements and error handling.

Table 3.2-5. ICIS-Air FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.9.5	The system shall not allow a Facility to have more than one FCE on the same day.	ICIS-Air version 1.0
2.	5.9.6	The system shall allow a Facility to have more than one PCE on the same day.	ICIS-Air version 1.0
3.	5.9.10	The system shall allow a Facility to have more than one Investigation on the same day.	ICIS-Air version 1.0
4.	N/A	The system shall allow a Facility to have more than one Information Request on the same day.	ICIS-Air version 1.0
5.	N/A	The system shall highlight the pollutants that are not on the Facility record on Pollutants Involved list	ICIS-Air version 1.0
6.	5.9.5, 5.9.6, 5.9,10	The system shall ensure that the FCE, PCE, Investigation, or Information Request is associated to an existing Facility ID.	ICIS-Air version 1.0
7.	5.9.5, 5.9.6, 5.9,10	The system shall ensure that an FCE, PCE, or Information Request is associated to only one Facility.	ICIS-Air version 1.0
8.	N/A	The system shall ensure that an Investigation can be associated to one or many Facilities.	ICIS-Air version 1.0
9.	N/A	The system shall run the background processes: Generate CMS Record Data and Generate Current CMS Status when a new FCE is added.	ICIS-Air version 1.0
10.	N/A	The system shall run the background processes: Generate CMS Record Data and Generate Current CMS Status when an FCE is edited.	ICIS-Air version 1.0
11.	N/A	The system shall run the background processes: Generate CMS Record Data and Generate Current CMS Status when an FCE is deleted.	ICIS-Air version 1.0
12.	N/A	The system shall default the "Did EPA Assist?" data element to blank if the user selects EPA for Agency.	ICIS-Air version 1.0
13.	N/A	The system shall require the user to enter the "Did EPA Assist?" data element if any value except U.S. EPA exists for Compliance Monitoring Agency Type.	ICIS-Air version 1.0
14.	N/A	The system shall require the user to enter the "Did EPA Assist?" data element if the user selects any value other than EPA for Agency.	ICIS-Air version 1.0
15.	N/A	The system shall ensure that a Delegated Agency user can only select one Federal Statute for an FCE, PCE, Investigation, or Information Request.	ICIS-Air version 1.0
16.	N/A	The system shall ensure that the Planned Start Date is less than or equal to the Planned End Date.	ICIS-Air version 1.0
17.	N/A	The system shall ensure that the Planned End Date must be less than or equal to the current date.	ICIS-Air version 1.0
18.	N/A	The system shall require the user to enter one of the following dates: Planned Start Date, Planned End Date, Actual Start Date, or Actual End Date.	ICIS-Air version 1.0
19.	N/A	The system shall ensure that the Actual Start Date is less than or equal to the Actual End Date.	ICIS-Air version 1.0
20.	N/A	The system shall ensure that the Actual End Date must be less than or equal to the current date.	ICIS-Air version 1.0
21.	N/A	The system shall require the user to enter a value for "What was the purpose of the participation of the other party?" if "Was this a State, Federal, or Joint (State/Federal) Compliance Monitoring Activity?" = Joint.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
22.	N/A	The system shall require the user to enter a value for "Which party had the lead?" if "Was this a State, Federal, or Joint (State/Federal) Compliance Monitoring Activity?" = Joint.	ICIS-Air version 1.0
23.	N/A	The system shall ensure that the users do not enter values for following data elements if "Did you observe deficiencies (potential violations) during the on-site Inspection" = No, • Deficiencies observed • If you observed deficiencies, did you communicate the deficiencies to the Facility during the Inspection? • Did you observe the Facility take any actions during the inspection to address the deficiencies noted? • If yes, what actions were taken? • Water Pollutants • Air Pollutants	ICIS-Air version 1.0
24.	N/A	The system shall require the user to enter a value for "Did you observe the Facility take any actions during the inspection to address the deficiencies noted?" if "If you observed deficiencies, did you communicate the deficiencies to the Facility during the Inspection?" = Yes.	ICIS-Air version 1.0
25.	N/A	The system shall require the user to enter a value for "If yes, what actions were taken" if "Did you observe the Facility take any actions during the inspection to address the deficiencies noted?" = Yes.	ICIS-Air version 1.0
26.	N/A	The system shall ensure that the users do not enter values for the following data elements if "Did you observe the Facility take any actions during the inspection to address the deficiencies noted?" = No: • If yes, what actions were taken? • Water Pollutants • Air Pollutants	ICIS-Air version 1.0
27.	N/A	The system shall allow the user to enter a value for Partial Compliance Evaluation Type if the Compliance Monitoring Type is Partial Compliance Evaluation On-Site or Partial Compliance Evaluation Off-Site.	ICIS-Air version 1.0
28.	N/A	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new FCE, PCE, Investigation, and Information Request data.	ICIS-Air version 1.0
29.	5.9.2	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all new FCE, PCE, Investigation, and Information Request data.	ICIS-Air version 1.0
30.	5.1.7	The system shall require the user to select at least one additional value for Programs or Air Programs if "Other" has been selected for Programs or Air Programs field.	ICIS-Air version 1.0
31.	N/A	The system shall require the user to enter the Other Air Programs field if the "Other" value has been selected for Programs or Air Programs.	ICIS-Air version 1.0

3.2.2.5   *Add FCE, PCE, Investigation, or Information Request*

Users must enter an FCE, PCE, Investigation, or Information Request against an existing Facility. Data for FCEs, PCEs, Investigations, and Information Requests will be captured in ICIS-Air under Compliance Monitoring. Users must have the Add Evaluations privileges to add a new FCE, PCE, Investigation, or Information Request. Only users with enforcement sensitive privileges will be allowed to view and add enforcement sensitive Investigation Planned Start

Date and Actual Start Date and FCE/PCE Planned Start and End Dates if the Actual Start and End Dates do not exist.

An FCE, PCE, Investigation, or Information Request is uniquely identified by the following key data elements:

- Unique Identifier

The following data elements are required to add a new FCE, PCE, Investigation, or Information Request in ICIS-Air:

- Compliance Monitoring Type
- Facility
- Compliance Monitoring Activity Name (Federal only)
- Region (Federal only)
- Federal Statutes (System generated for Delegated Agency)
- Law Sections (Federal only)
- Programs or Air Programs
- Compliance Monitoring Reason (Federal only)
- Compliance Monitoring Agency Type (Federal only)

Batch

Batch users will have an Add Compliance Monitoring transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.2.3, FCEs, PCEs, Investigations, and Information Requests Data Elements, and Section 3.2.2.4, FCEs, PCEs, Investigations, and Information Requests Business Rules, for more details.

Figure 3.2-5 illustrates the processing required for adding an FCE, PCE, Investigation, or Information Request to ICIS-Air through a batch transaction.

Figure 3.2-5. Use Case: Add FCE, PCE, Investigation, or Information Request—Batch
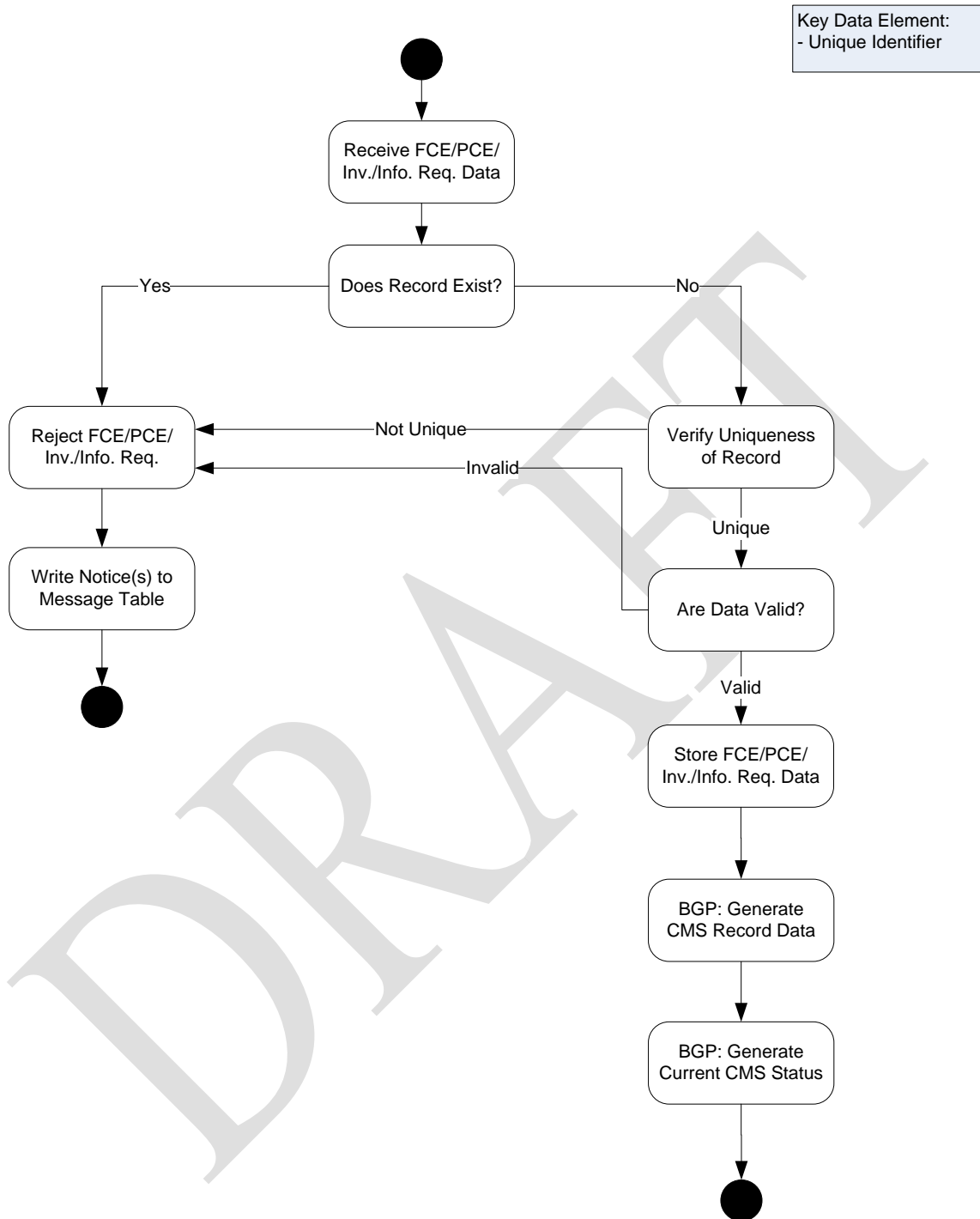
Key Data Element:
- Unique Identifier

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.2.3, FCEs, PCEs, Investigations, and Information Requests Data Elements, and Section 3.2.2.4, FCEs, PCEs, Investigations, and Information Requests Business Rules, for more details.

Figure 3.2-6 illustrates the processing required for adding an FCE, PCE, Investigation, or Information Request in ICIS-Air online.

Figure 3.2-6. Use Case: Add FCE, PCE, Investigation, or Information Request—Web
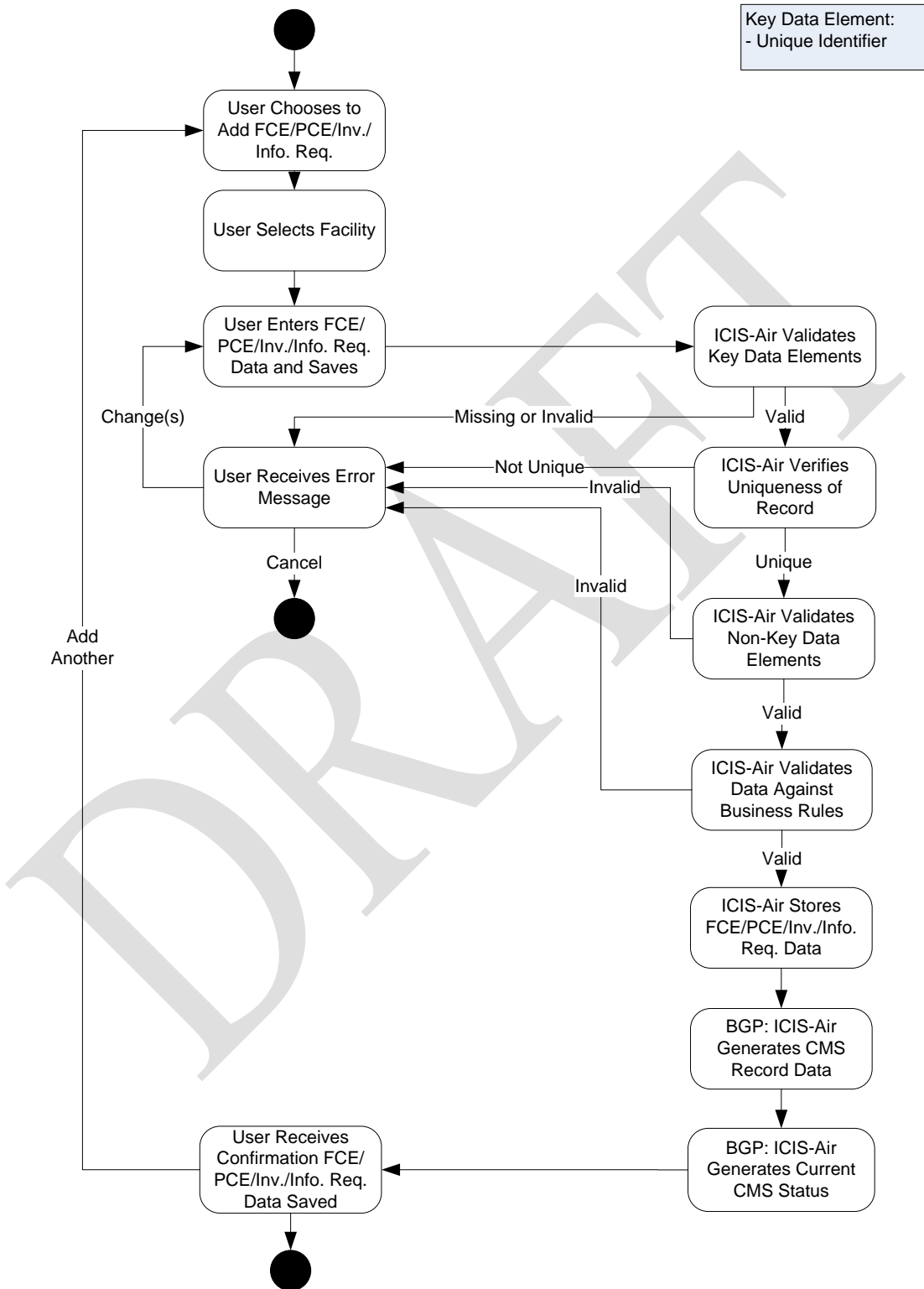
Users must have the Add Evaluations privileges to add a new FCE, PCE, Investigation, or Information Request. Only users with enforcement sensitive privileges will be allowed to view and add enforcement sensitive data, Investigation Planned Start Date and Actual Start Date and FCE/PCE Planned Start and Date Dates if Actual Start and End Dates do not exist. Once the record is saved, only users with enforcement sensitive privileges may view or edit enforcement sensitive data.

Users can add a new Compliance Monitoring record by:

1. Searching and selecting the Facility ID and then adding the FCE, PCE, Investigation, or Information Request record

2. Selecting Add FCE, PCE, Investigation, or Information Request on the Home Page and then associating the Facility ID to the record

3. Selecting to add an FCE, PCE, Investigation, or Information Request on the List Compliance Monitoring screen

4. Selecting to add/link another on the FCE, PCE, Investigation, or Information Request screens.

Figure 3.2-7 shows the Add FCE, PCE, Investigation, or Information Request notional screen for Federal users. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-7. Notional Screen: Add FCE, PCE, Investigation, or Information Request (Federal)

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (potential violations) during the on-site Inspection? ▼

Deficiencies

Potential excess emission in violation of regulations
Potential failure to complete or submit a notification, report, certification, or manifest
Potential failure to follow a permit condition(s)
Potential failure to follow a required sample monitoring procedure or laboratory procedu

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? ▼

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? ▼

If yes, what actions were

Complete(d) a Notification or Report
Correct(ed) Monitoring Deficiencies
Correct(ed) Record Keeping Deficiencies
Implemented New or Improved Management Practices or Procedures

Water Pollutants:

[Pollutants]

Air Pollutants:

[Pollutants]

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during inspections? ▼

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the Inspection? ▼

Link to Document

Link to Document: [   ] [Manage Links]

Government Contacts   [Manage Contacts]

Last Name	First Name	Middle Name	Role	Phone	Fax	E-mail	Office	Organization

Codes		Priorities	

Codes

NAICS Codes:

[text area]

Add/Remove

SIC Codes:

[text area]

Add/Remove

Priorities

OECA National Priority:

2010 - Air Toxics - Excess Emissions
2010 - Air Toxics - Flares
2010 - Air Toxics - LDAR
2010 - Air Toxics - Area Source Air Toxics - 6 H Auto Body

Regional Priority:

2010 - Region 01 - Accident Prevention
2010 - Region 01 - Air Toxics
2010 - Region 01 - Energy and Climate Change

Media Monitored

Media Monitored: [dropdown]

Compliance Monitoring Media

Multimedia Indicator: ☐

Compliance Monitoring Information

Number of Days Physically Conducting Activity: [field]

Number of Hours Physically Conducting Activity: [field]

Compliance Monitoring Action Outcome: [dropdown]

Compliance Monitoring Rating Code: [dropdown]

Compliance Monitoring Comments

Manage Comments

Entered On	Entered By	Comments	Sensitive?

Cross Media Indicators

Federal Facility Activity: [dropdown]

Federal Facility Activity Comment: [text area]

User Defined Fields

1: ☐

2: [field]   3: [field]

4: [field] 📅   5: [field] 📅

6: [text area]

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

Save & Exit   Save & Continue   Add/Link Another   Cancel

Figure 3.2-8 shows the Add FCE, PCE, Investigation, or Information Request notional screen for Delegated Agency users. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-8. Notional Screen: Add FCE, PCE, Investigation, or Information Request (Delegated Agency)

Pollutants Information

Manage Pollutants

Pollutants Involved:

Contacts and Addresses

Manage Contacts

Last Name   First Name   Middle Name   Role   Address   Phone   Fax   E-mail   Office   Organization

Compliance Monitoring Media Indicator

Multimedia Indicator: ☐

Evaluation Conclusion

Were deficiencies found?

Link to Document

Link to Document: Manage Links

Priorities

National Priority: 2010 - Air Toxics - Flares
2010 - Air Toxics - LDAR
2010 - Air Toxics - Surface Coating
2010 - Financial Assurance - CERCLA

Regional Priority: 2010 - Region 10 - CAFO Initiative Areas

State Priority:

Compliance Monitoring Comments

Manage Comments

Entered On   Entered By   Comments   Sensitive?

User Defined Fields   **Sensitive:** ☑

1: ☐

2:                              3:

4:                              5:

6:

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

Save & Exit   Save & Continue   Add/Link Another   Cancel

3.2.2.6   Edit FCE, PCE, Investigation, or Information Request

Users can edit an FCE, PCE, Investigation, or Information Request within the view and edit screen of the Compliance Monitoring record. A user also will have the ability to link the FCE, PCE, Investigation, or Information Request to other Compliance Monitoring activities, Enforcement Actions, or Alleged Violation Files from the Link Related Activities screen. Changes and updates to these data elements will result in changes on the displayed fields on the Compliance Monitoring screen.

The following data elements are key data elements that uniquely identify an FCE, PCE, Investigation, and Information Request record and cannot be edited through the Edit Compliance Monitoring transaction:

- Unique Identifier
- Compliance Monitoring Type.

Batch

Batch users will have an Edit FCE, PCE, Investigation, and Information Request transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.2.2.3 and business rules in Section 3.2.2.4 for more details on rejecting FCE, PCE, Investigation, and Information Request edit transactions.

Figure 3.2-9 illustrates the processing required for editing a FCE, PCE, Investigation, or Information Request in ICIS-Air through a batch transaction.

Figure 3.2-9. Use Case: Edit FCE, PCE, Investigation, or Information Request—Batch
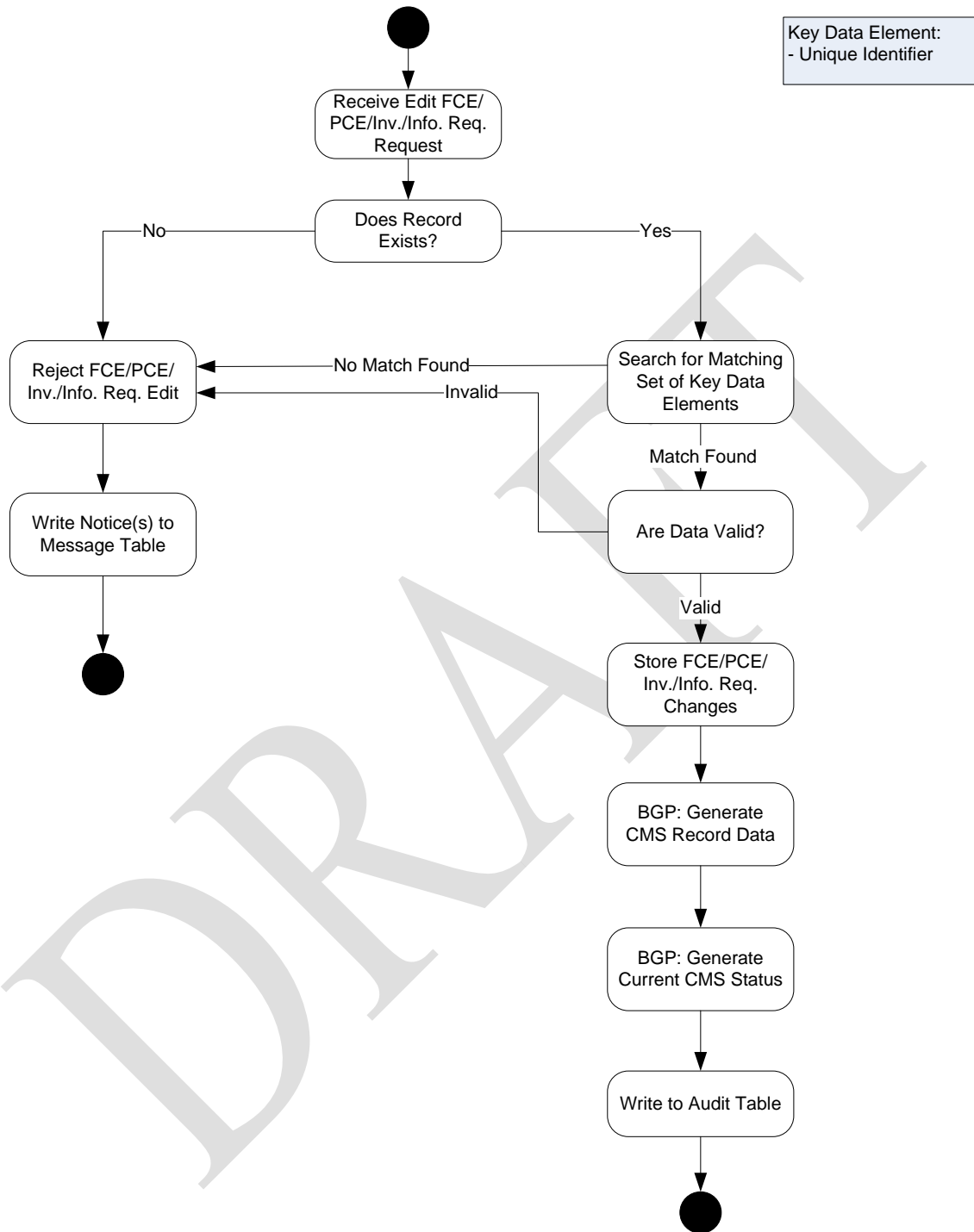
Key Data Element:
- Unique Identifier

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.2.3, FCEs, PCEs, Investigations, and Information Requests Data Elements, and Section 3.2.2.4, FCEs, PCEs, Investigations, and Information Requests Business Rules, for more details.

Users can edit a Compliance Monitoring record by:

1. Entering the Unique Identifier and clicking on Jump To on the Home Page

2. Searching for the Compliance Monitoring record on the Search Compliance Monitoring Activities screen and then selecting the FCE, PCE, Investigation, or Information Request record on the List Compliance Monitoring Activities screen

3. Searching and selecting the Facility ID and then selecting the Compliance Monitoring record.

Figure 3.2-10 illustrates the processing required for editing a FCE, PCE, Investigation, or Information Request record in ICIS-Air online.

Figure 3.2-10. Use Case: Edit FCE, PCE, Investigation, or Information Request —Web
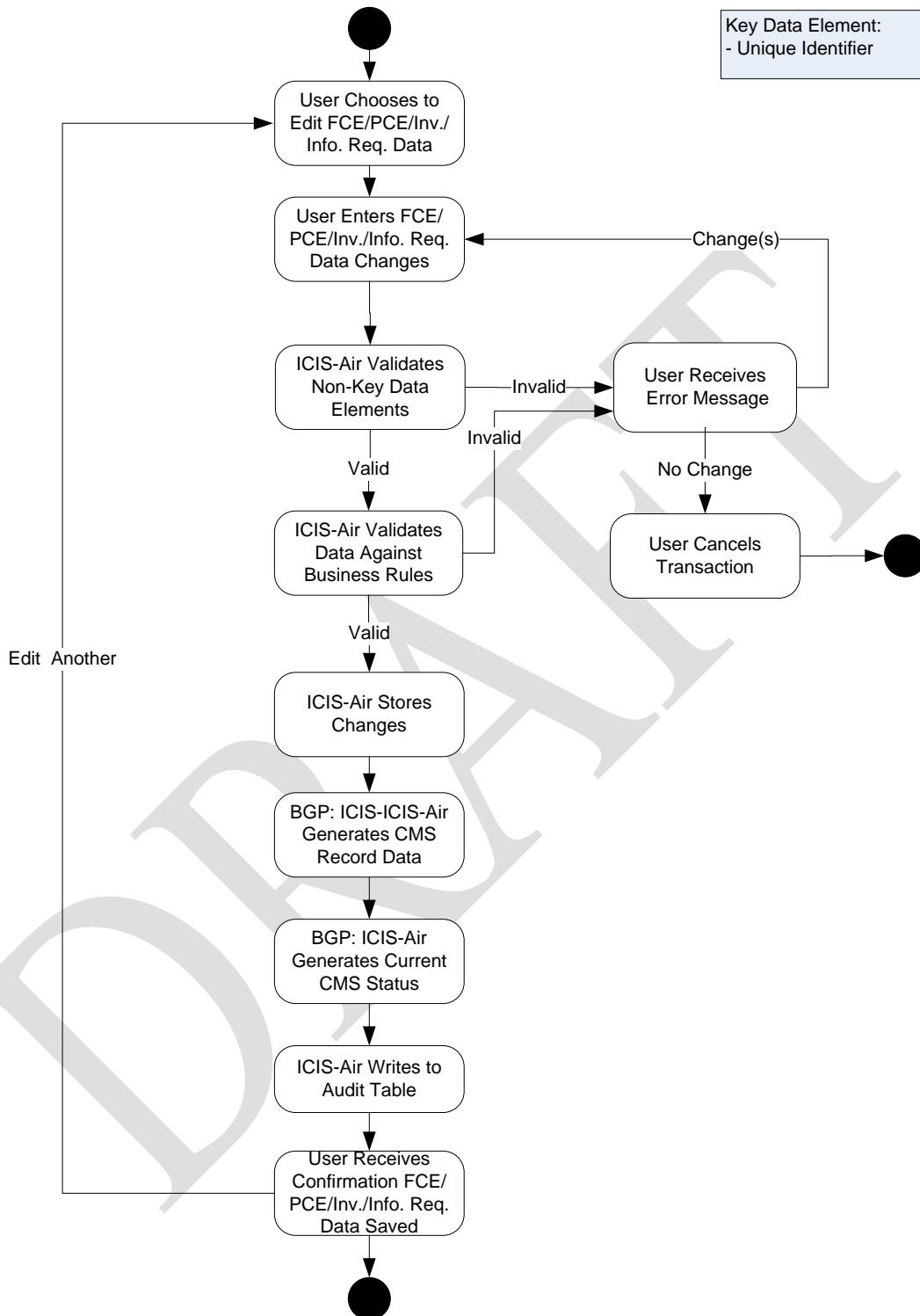
Users must have the Edit Evaluations role to edit an existing FCE, PCE, Investigation or Information Request and only users with Enforcement Sensitive role may view or edit Investigation Planned Start Date and Actual Start Date and FCE/PCE Planned Start and End Dates if the Actual Start and End Dates do not exist.

Figure 3.2-11 shows the Edit FCE, PCE, Investigation, or Information Request notional screen for Federal users. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-11. Notional Screen: Edit FCE, PCE, Investigation, or Information Request (Federal)

*Compliance Monitoring Action Reason: Agency Priority / Citizen Compliant/Tip / Core Program / For Cause

*Compliance Monitoring Agency Type: U.S. EPA / Tribal-Using Federal Credential / Tribal

Compliance Monitoring Agency Name: U.S. EPA

If State, Local or Tribal lead, did EPA Assist? Yes

Was this a State, Federal or Joint(State/Federal) Compliance Monitoring Activity? Joint

If Joint, what was the purpose of the participation of the other party? True joint inspection, with EPA and the State

Which party had the lead? U.S. EPA

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (potential violations) during the on-site Inspection? Yes

Deficiencies

Potential excess emission in violation of regulations
Potential failure to complete or submit a notification, report, certification, or manifest
Potential failure to follow a permit condition(s)
Potential failure to follow a required sample monitoring procedure or laboratory procedure

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? Yes

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? Yes

If yes, what actions were

Complete(d) a Notification or Report
Correct(ed) Monitoring Deficiencies
Correct(ed) Record Keeping Deficiencies
Implemented New or Improved Management Practices or Procedures

Water Pollutants:

[Pollutants]

Air Pollutants:

Carbon Monoxide

[Pollutants]

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during inspections? Yes

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the Inspection? Yes

Link to Document

Link to Document: APS Green On-Site PCE Report   [Manage Links]

Government Contacts   [Manage Contacts]

Last Name	First Name	Middle Name	Role	Phone	Office	Organization
Smith	John	Yokee	Inspector	202-132-4599	Air Enforcement	U. S. EPA

Codes

NAICS Codes: 6517 Railroad Property Lessors

[Add/Remove]

SIC Codes: 532411 Commercial Air, Rail, Water Transportation Equipment Rental and Leasing

[Add/Remove]

Priorities

OECA National Priority:
2010 - Air Toxics - Excess Emissions
2010 - Air Toxics - Flares
2010 - Air Toxics - LDAR
2010 - Air Toxics - Area Source Air Toxics - 6 U Auto Body

Regional Priority:
2010 - Region 10 - Accident Prevention
2010 - Region 10 - Air Toxics
2010 - Region 10 - Energy and Climate Change

Media Monitored

Media Monitored:

Compliance Monitoring Media

Multimedia Indicator: ☑

Compliance Monitoring Information

Number of Days Physically Conducting Activity:

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

Compliance Monitoring Comments

[Manage Comments]

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Henri	Comments about this PCE.	Yes
04/03/2010	Shannon Lee	Need to obtain more information.	
03/10/2010	David Tech	This is a comment about this PCE.	

Cross Media Indicators

Federal Facility Activity:

Federal Facility Activity Comment:

User Defined Fields

1: ☑

2: This is field # 2 on the report

3:

4: 03/01/2010

5:

6:

Created By: John Smith Created Date: 02/01/2010
Last Modified By: John Smith Last Modified Date: 06/01/2010

[Save & Exit] [Save & Continue] [Add/Link Another] [Cancel]

Figure 3.2-12 shows the Edit FCE, PCE, Investigation, or Information Request notional screen for Delegated Agency users. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-12. Notional Screen: Edit FCE, PCE, Investigation, or Information Request (Delegated Agency)

Government Contacts and Addresses

Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization
Smith	John	Greg	Inspector	1234 Main Street, Washington, DC 22222	202-132-4599	202-132-4598	jsmith@epa.gov	Kean & Company	Region 10

Compliance Monitoring Media Indicator

Multimedia Indicator: ☐

Priorities

National Priority:
2010 - Air Toxics - Flares
2010 - Air Toxics - LDAR
2010 - Air Toxics - Surface Coating
2010 - Financial Assurance - CERCLA

Evaluation Conclusion

Were deficiencies found? No ▼

Regional Priority: 2010 - Region 10 - CAFO Initiative Areas

Link to Document

Link to Document: APS Green On-Site PCE Report   Manage Links

State Priority:

Compliance Monitoring Comments

Manage Comments

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Henri	Comments about this PCE.	Yes
04/03/2010	Shannon Lee	Need to obtain more information.	
03/10/2010	David Tech	This is a comment about this PCE.	

User Defined Fields   Sensitive: ☑

1: ☑

2: This is field # 2 on the report   3:

4: 03/01/2010 📅   5: 📅

6:

Created By: John Smith Created Date: 02/01/2010

Last Modified By: John Smith Last Modified Date: 06/01/2010

Save & Exit   Save & Continue   Add/Link Another   Cancel

3.2.2.7   Delete FCE, PCE, Investigation, or Information Request

When users delete an FCE, PCE, Investigation or Information Request, the Compliance Monitoring activity and all child records for that Compliance Monitoring activity will be deleted. The child records include:

- Links to other FCEs, PCEs, Investigations, or Information Requests
- Links to TV ACCs
- Links to Stack Tests
- Links to CEM/EERs
- Links to Enforcement Actions
- Links to Alleged Violation Files

Batch

Batch users will have Delete FCEs, PCEs, Investigation, or Information Request transactions rejected if the record does not exist or the business rules are violated.

Figure 3.2-13 illustrates the processing required for deleting an FCE, PCE, Investigation, or Information Request from ICIS-Air through a batch transaction.

Figure 3.2-13. Use Case: Delete FCE, PCE, Investigation, or Information Request—Batch
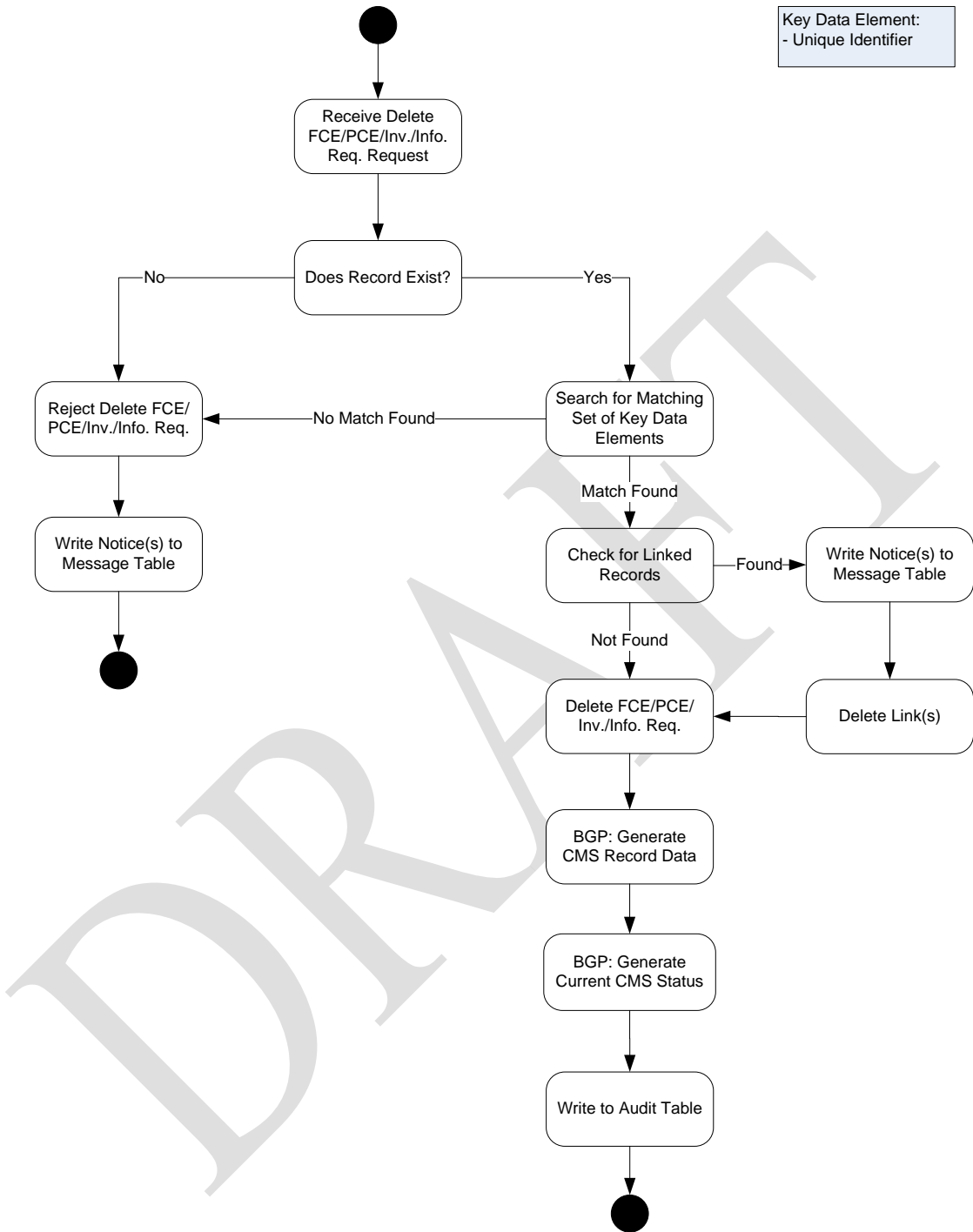
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Users can delete an FCE, PCE, Investigation, or Information Request record by searching for the record on the Search Compliance Monitoring Activities screen and then selecting the Delete link next to the record on the List Compliance Monitoring Activities screen.

Figure 3.2-14 illustrates the processing required for deleting a FCE, PCE, Investigation, or Information Request from ICIS-Air online.

Figure 3.2-14. Use Case: Delete FCE, PCE, Investigation, or Information Request—Web
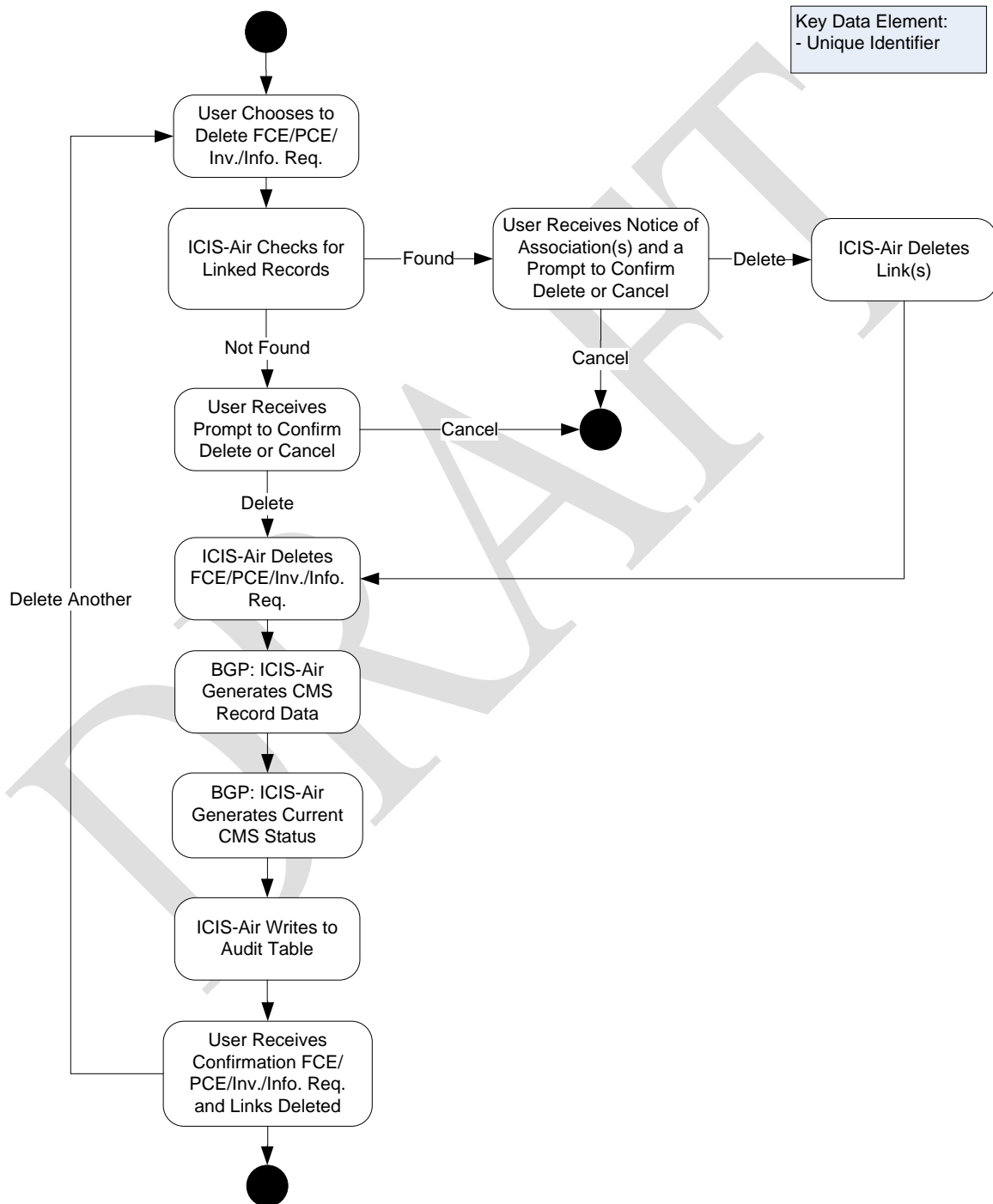
3.2.3 Stack Tests

Stack Tests are a subset of a PCE performed at facilities to ensure the facilities' compliance with regulatory requirements for emissions limits, or capture or control efficiencies. Delegated Agencies are required to conduct stack tests when there are no other means for determining compliance with the emission limits. A Stack Test can be completed multiple times on a specific day with different processes and pollutants involved in each test.

There will be three methods of data entry into ICIS-Air:

1. Entered by the user via the web interface
2. Submitted by the user via batch
3. Imported electronically from EPA's electronic reporting repository. Refer to the Interface Systems Module for imported Stack Test data.

The figure below shows the process for data entry by the user and electronic data imports including when the system calculates data and generates notifications.

Figure 3.2-15. Stack Test Process Flow
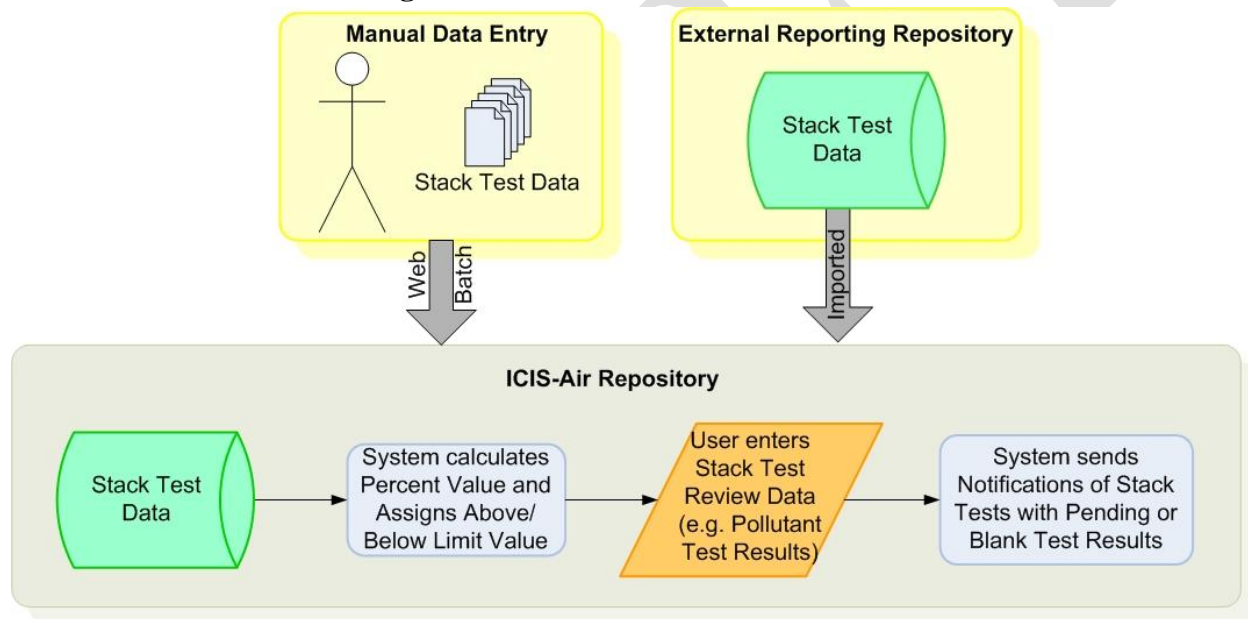
The requirements, functionality, data elements, and business rules that support the processing of Stack Tests are detailed in the following subsections.

3.2.3.1 Summary of Stack Tests Modernization in ICIS-Air

Some Stack Test functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Electronic Stack Test Data**
  Legacy AFS does not import electronic Stack Test data from an external system. ICIS-Air will import electronic Stack Test data and link the Stack Test record to the electronic reports stored in the electronic reporting repository, assumed to be WebFIRE.

- **Stack Test Status**

    In legacy AFS, users were required to provide test results at the parameters and pollutants level. For ICIS-Air, users will be required to provide test results at the Stack Test level to indicate whether the Stack Test has pass or fail. If the Stack Test fails, then the system will require additional test results data to be entered for the failed parameter or pollutant tested of that Stack Test. If the Stack Test passes, then no additional parameter or pollutant information is required for data entry.

- **Parameters/Pollutants Tested and Test Results**

    In legacy AFS, users were required to provide all test results at the parameter and pollutant level regardless of whether they passed or fail. For ICIS-Air, the system will require users to enter only failed parameter and pollutant test results.

    In legacy AFS, users provided a parameter or pollutant test result with Pass, Fail, or Pending statuses only. For ICIS-Air, test results will continue to be tracked as Pass, Fail, or Pending, in addition to three new statuses, Blank, Not Applicable (N/A) and Incomplete. The table below provides a summary of the Test Results values.

Table 3.2-6. Pollutant Test Results

ICIS-Air Value	Mainframe AFS Value	Definition
Blank		No value is assigned, default for all new and imported records
Pass	Pass	Pollutant's test passed
Fail	Fail	Pollutant's test fail
Pending	Pending	Awaiting determination of Pollutant's results
N/A		Test Result does not apply for Pollutant
Incomplete		Test Result cannot not be determined due to incomplete data entered or more information has been requested

- **Calculated Percent Value Above or Below Limit**

    The system will automatically calculate the percent value based on the allowable limit and actual number and indicate whether the actual number is above, below, or meets the allowable limit. If the Stack Test results are received electronically, the user will see the allowable and actual numbers as well as the calculations.

- **Notification of Pollutants with Pending or Blank Statuses**

    In legacy AFS, users cannot easily view a list of Stack Tests containing pollutants with test results of Pending. In ICIS-Air, users will be able to view the Stack Tests with Pending and Blank statuses immediately as data are saved into the system from:

    - Search Results screen when a user searches for Stack Tests containing Test Results with Pending or Blank statuses
    - A report that lists Stack Tests with Pending and Blank statuses
    - A notification will be displayed upon subsequent logins to the user who originally entered the Stack Test's Pollutant Test Results data until the Pending status is cleared.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Stack Tests in ICIS-Air.

3.2.3.2   *Stack Tests Functional Requirements*

Table 3.2-7 lists the requirements that apply to Stack Tests. It includes functions that are allowed and business rules within a function. It also includes interface requirements for data imported from the electronic reporting repository into ICIS-Air.

Table 3.2-7. ICIS-Air Stack Tests Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.1, 5.5.4, 5.9.1	EPA SRS	The system shall allow the user to view Stack Test data.	ICIS-Air version 1.0
2.	5.9.1	EPA SRS	The system shall allow the user to add a new Stack Test record.	ICIS-Air version 1.0
3.	5.9.1	EPA SRS	The system shall allow the user to edit existing Stack Test data elements that are not supplied by an external system.	ICIS-Air version 1.0
4.	5.9.1	EPA SRS	The system shall allow the user to delete only Stack Test records that were entered manually.	ICIS-Air version 1.0
5.	5.9.1	EPA SRS	The system shall allow the user to access the Add Stack Test screen from the homepage, the Compliance Monitoring Search Results screen, and Compliance Monitoring tab on the Facility screen, and the List Activities Eligible to be Related screen from another activity.	ICIS-Air version 1.0

6.	5.4.1, 5.9.7, 5.9.8	EPA SRS	The system shall display the following data elements on the Stack Test screen:
			Parent Stack Test Record:
			• Unique Identifier
			• Facility ID
			• Facility Name
			• Permitted Source Name
			• Purpose of Stack Test
			• Other Purpose of Stack Test
			• Agency (defaults to user's profile)
			• Stack Test Conducted By (defaults to Owner/Operator)
			• Observed By
			• Stack Test Status
			• National Initiatives
			• Date Test is Scheduled
			• Date Test Completed
			• Date Report Received
			• Date Test Results were Reviewed
			• Link to Document
			• Data Imported from External System (system generated)
			• Comments
			  – Comment
			  – Enter On
			  – Entered By
			  – Sensitive?
			• User Defined Field 1
				ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

			• User Defined Field 2
			• User Defined Field 3
			• User Defined Field 4
			• User Defined Field 5
			• User Defined Field 6
			• User Defined Field Sensitive Flag
			• Contacts and Addresses
			    – Last Name
			    – First Name
			    – Middle Name
			    – Role
			    – Address
			    – Phone
			    – Fax
			    – E-mail
			    – Office
			    – Organization
			• Stack Test Results Records:
			    – Parameter/Pollutant Tested
			    – Air Programs
			    – Other Air Programs
			    – Method Codes
			    – Allowable Number, Allowable Units
			    – Actual Number, Actual Units
			    – Percent
			    – Above/Below Limit
			    – Test Result
			    – Reason for Failure
			    – Test Result Based on Imported Data	

7.	5.9.1, 5.9.7	EPA SRS	The system shall enforce the security model for the users to view, add, edit, and delete a Stack Test. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
8.	N/A		The system shall require the user to enter a Facility ID that already exists in the system for a Stack Test record.	ICIS-Air version 1.0
9.	N/A		The system shall allow the user to enter zero to many pollutants for a Stack Test record.	ICIS-Air version 1.0
10.	5.9.7, 5.9.8	EPA SRS	The system shall allow the user to enter multiple comments for a Stack Test record.	ICIS-Air version 1.0
11.	5.9.7, 5.9.8	EPA SRS	The system shall allow the user to enter multiple Government Contacts and Addresses for a Stack Test record.	ICIS-Air version 1.0
12.	5.9.7, 5.9.8	EPA SRS	The system shall allow the user to enter multiple non-Government Contacts and Addresses for a Stack Test record.	ICIS-Air version 1.0
13.	5.14.5, 5.33.1	EPA SRS	The system shall display a notification upon subsequent logins to the user who originally entered the Stack Test's Pollutant Test Results data if any Pollutant contains Test Result with Pending status.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
14.	5.14.3	EPA SRS	The system shall identify Stack Test records that were imported from an electronic reporting repository with an indicator.	ICIS-Air version 1.0
15.	5.14.3	EPA SRS	The system shall not allow the user to modify external system-supplied Stack Test data elements if the record was imported from the electronic reporting repository.	ICIS-Air version 1.0
16.	5.14.3	EPA SRS	The system shall not allow the user to delete a Stack Test record that was imported from the electronic reporting repository.	ICIS-Air version 1.0
17.	5.18.2	EPA SRS	The system shall not allow the user to modify the actual Stack Test electronic report that resides on the electronic reporting repository.	ICIS-Air version 1.0
18.	N/A		The system shall allow the user to modify the data on the electronically imported Stack Test record if the data did not come from an external system.	ICIS-Air version 1.0

3.2.3.3 Stack Tests Data Requirements

Table 3.2-8 lists the data element requirements that apply to Stack Tests. This table includes the system, minimum data requirements, and possible future data elements.

Table 3.2-8. ICIS-Air Stack Tests Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
1.	Y	Y	Y	N	5.14.3	Unique Identifier • User Defined or System Generated • Alphanumeric (15)
2.	N	N	N	Y	5.9.7	Activity Type • Valid values: – Stack Test • System generated value stored on the backend
3.	N	Y	Y	N	5.9.7	Facility ID • Foreign Key of Linked Facility
4.	N	N	N	N	5.9.7	Permitted Source Name • Alphanumeric (100) • Free-form text
5.	N	N	N	N	5.9.7	Purpose of Stack Test • Multiselect • Valid Values: – Relative Accuracy Test Audits (RATAS) – Linearity Checks – Calibration of Continuous Emission Monitoring (CEM) – Performance Test Demonstrating Compliance (National Reporting) – Testing to Develop Regulations – Parametric Monitoring for 40 CFR Part 64 – Testing to Develop and Evaluate Alternative Test Methods – Voluntary Testing – SIP Compliance Tests (State Only Rules)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
						– Other
6.	N	N	N	N	5.9.7	Other Purpose of Stack Test • Conditionally system required if Other is selected for Purpose of Stack Test • Alphanumeric (100) • Free-form text
7.	N	N	N	Y	5.9.7	Agency • Defaults to User's Agency • Valid Values: – U.S. EPA – State – Tribe – Local Government
8.	N	Y	Y	Y	5.9.7	Stack Test Conducted By • Defaults to Owner/Operator • Valid Values: – Owner/Operator (Default) – U.S. EPA – State – Tribe – Local Government
9.	N	N	N	N	5.9.7	Observed By • Multiselect • Valid Values: – U.S. EPA – State – Tribe – Local Government – Not Observed
10.	N	N	N	N	5.9.7	National Initiatives • Multiselect • Must be validated against REF_PRIORITY table
11.	N	N	N	N	5.9.7	Date Test is Scheduled • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
12.	N	N	Y	N	5.9.7	Date Test Completed • Date • Conditionally required if at least one Pollutant contains Actual Number – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
13.	N	N	N	N	5.9.7	Date Report Received • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
14.	N	N	Y	N	5.9.7	Date Test Results were Reviewed • Date – Batch: Must be valid date in yyyy-mm-dd format

ID	Key?	SR	PR	SG	Client Req ID	Requirement
						– Web: Must be valid date in mm/dd/yyyy format
15.	N	N	N	N	5.9.7	Link to Document • URL to Report in electronic document repository or electronic reporting repository
16.	N	N	N	Y	5.18.2	Document Version • Date

17.	N	N	N	Y	N/A	Data Imported from External System
						• Alphanumeric (1)
						• Valid Values:
						  – N (Default)
						  – Y

18.	N	C	C	N	5.9.7	Parameter/Pollutant Tested • Must be validated against REF_POLLUTANT or REF_PARAMETER table • At least one Pollutant or Parameter is conditionally systemically and programmatically required if Stack Test Status is Fail
19.	N	C	C	N	5.9.7	Air Programs • Multiselect • Defaults to Facility's Air Programs • Must be validated against REF_PROGRAM table • Conditionally systemically and programmatically required if Stack Test Status is Fail
20.	N	N	N	N	5.9.7	Other Air ProgramsAlphanumeric (100) • Free-form text
21.	N	N	N	N	5.9.7	Method Codes • Multiselect • Must be validated against REF_METHOD_CODES table, see Stack Test Method Codes section
22.	N	N	N	N	5.9.7	Allowable Number • Number
23.	N	N	N	N	5.9.7	Allowable Units • Must be validated against REF_POLLUTANT_UNIT table
24.	N	N	N	N	5.9.7	Actual Number • Number
25.	N	N	N	Y	5.9.7	Actual Units • Defaults to Allowable Units
26.	N	N	N	Y	5.9.7	Percent • Calculated Percentage – (Actual Number – Allowable Number) / Allowable Number * 100

27.	N	N	N	Y	5.9.7	Above/Below Limit
						• Valid Values:
						  – Above Limit
						  – Below Limit
						  – Meets Limit

28.	N	N	C	N	5.9.7	Test Result

ID	Key?	SR	PR	SG	Client Req ID	Requirement
						• Valid Values: – Blank (Default for Imported Stack Test Data) – Pass – Fail – Pending – Incomplete – N/A • Conditionally programmatically required if Stack Test Status is Fail
29.	N	N	N	N	5.9.7	Reason for Failure • Valid Values: – TBD – Other
30.	N	N	N	N	5.9.7	Other Reason for Failure • Alphanumeric (50) • Free-form text
31.	N	N	N	N	5.9.7	Test Result Based on Imported Data • Alphanumeric (1) • Valid Values: – N (Default) – Y
32.	N	N	N	N	5.9.7	Contacts Affiliation Type • Valid Values: – Stack Tester
33.	N	N	N	N	5.9.7	Contacts ID • Must be validated against Contacts table
34.	N	N	N	N	5.9.7	Comments • Multiple for a Stack Test record • Alphanumeric (500) • Free-form text
35.	N	N	N	Y	N/A	Comment Entered On • Date • System generated
36.	N	N	N	Y	N/A	Comment Entered By • Alphanumeric (50) • System generated
37.	N	N	N	N	N/A	Sensitive Comment • Alphanumeric (1) • Valid Values: – N – Y (Default)
38.	N	N	N	N	5.9.7	User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
39.	N	N	N	N	5.9.7	User Defined Field 2 • Alphanumeric (100) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Requirement
40.	N	N	N	N	5.9.7	User Defined Field 3 • Alphanumeric (100) • Free-form text
41.	N	N	N	N	5.9.7	User Defined Field 4 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
42.	N	N	N	N	5.9.7	User Defined Field 5 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
43.	N	N	N	N	5.9.7	User Defined Field 6 • Alphanumeric (500) • Free-form text
44.	N	N	N	N	N/A	UDF Sensitive Flag • Alphanumeric (1) • Valid Values: – N – Y (Default)
45.	N	N	Y	N	N/A	Stack Test Status • Valid Values: – Blank – Pass – Fail – Pending – Incomplete – N/A
46.	N	N	N	Y		Created By • System Generated based upon User ID
47.	N	N	N	Y		Created Date • System Generated • Date
48.	N	N	N	Y		Last Modified By • System Generated based upon User ID
49.	N	N	N	Y		Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/Conditional/No); SG = System Generated (Yes/No).

3.2.3.4 Stack Tests Business Rule Requirements

Table 3.2-9 lists the business rules requirements that apply to Stack Tests. This table includes the business rules for data elements and error handling.

Table 3.2-9. ICIS-Air Stack Tests Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The system shall ensure that the Stack Test is associated to an existing Facility.	ICIS-Air version 1.0
2.	N/A	The system shall allow the user to enter multiple Stack Test records for a	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
		Facility.	
3.	N/A	The system shall allow the user to enter multiple Stack Test records for the same Facility for the same Date Test Completed.	ICIS-Air version 1.0
4.	5.9.7	The system shall ensure that the Date Report Received is greater than or equal to the Date Test Completed.	ICIS-Air version 1.0
5.	5.9.7	The system shall ensure that the Date Test Results were Reviewed is greater than or equal to the Date Report Received.	ICIS-Air version 1.0
6.	5.9.7	The system shall ensure that at least one Parameter/Pollutant Tested record exists for a Stack Test if the Stack Test Result is Fail.	ICIS-Air version 1.0
7.	5.9.8	The system shall automatically set the Test Result to "Pending" if the value was not provided by the user.	ICIS-Air version 1.0
8.	5.9.8	The system shall automatically set Contains Pollutants with Pending Status to "Yes" if one or more values for the child Test Result contain "Pending".	ICIS-Air version 1.0
9.	N/A	The system shall automatically set the Above/Below Limit to "Above Limit" if the Actual Number for the Pollutant is greater than the Allowable Number.	ICIS-Air version 1.0
10.	N/A	The system shall automatically set the Above/Below Limit to "Below Limit" if the Actual Number for the Pollutant is less than the Allowable Number.	ICIS-Air version 1.0
11.	N/A	The system shall automatically set the Above/Below Limit to "Meets Limit" if the Actual Number for the Pollutant is equal to the Allowable Number.	ICIS-Air version 1.0
12.	N/A	The system shall ensure the Actual Unit value matches the Allowable Unit value.	ICIS-Air version 1.0
13.	N/A	The system shall default the Pollutant's Test Results value to blank for new Stack Test pollutant data.	ICIS-Air version 1.0
14.	5.9.2	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Stack Test data.	ICIS-Air version 1.0
15.	5.1.7	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all edited Stack Test data.	ICIS-Air version 1.0
16.	N/A	The system shall ensure that Parameter/Pollutant Tested must be unique for a Stack Test record.	ICIS-Air version 1.0
17.	N/A	The system shall set the Activity Type to Stack Test for Stack Test records.	ICIS-Air version 1.0
18.	N/A	The system shall require the user to select at least one additional value for Programs or Air Programs if "Other" has been selected for Programs or Air Programs field.	ICIS-Air version 1.0
19.	N/A	The system shall require the user to enter the Other Air Programs field if the "Other" value has been selected for Programs or Air Programs.	ICIS-Air version 1.0
20.	N/A	The system shall require the user to enter at least one fail Parameter/Pollutant Tested Results record if the Stack Test Status is Fail.	ICIS-Air version 1.0

3.2.3.5   Add Stack Tests

Users must enter a Stack Test against an existing Facility. Data for Stack Tests will be captured in ICIS-Air under Compliance Monitoring. Users must have the Add Stack Tests privileges to add a new Stack Test.

A Stack Test is uniquely identified by the following key data element:

- Unique Identifier.

The following data elements are required to add a new Stack Test in ICIS-Air:

- Unique Identifier
- Facility ID
- Stack Test Conducted By
- Stack Test Status

If the Stack Test Status is "Fail" the system will require the following information to be entered for the failed parameter/pollutant:

- Parameter/Pollutant Tested
- Air Program
- Parameter/Pollutant Test Result

Batch

Batch users will have an Add Stack Test transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.3.3, Stack Tests Data Elements, and Section 3.2.3.4, Stack Tests Business Rules, for more details.

Figure 3.2-16 illustrates the processing required for adding a Stack Test to ICIS-Air through a batch transaction.

Figure 3.2-16. Use Case: Add Stack Test—Batch
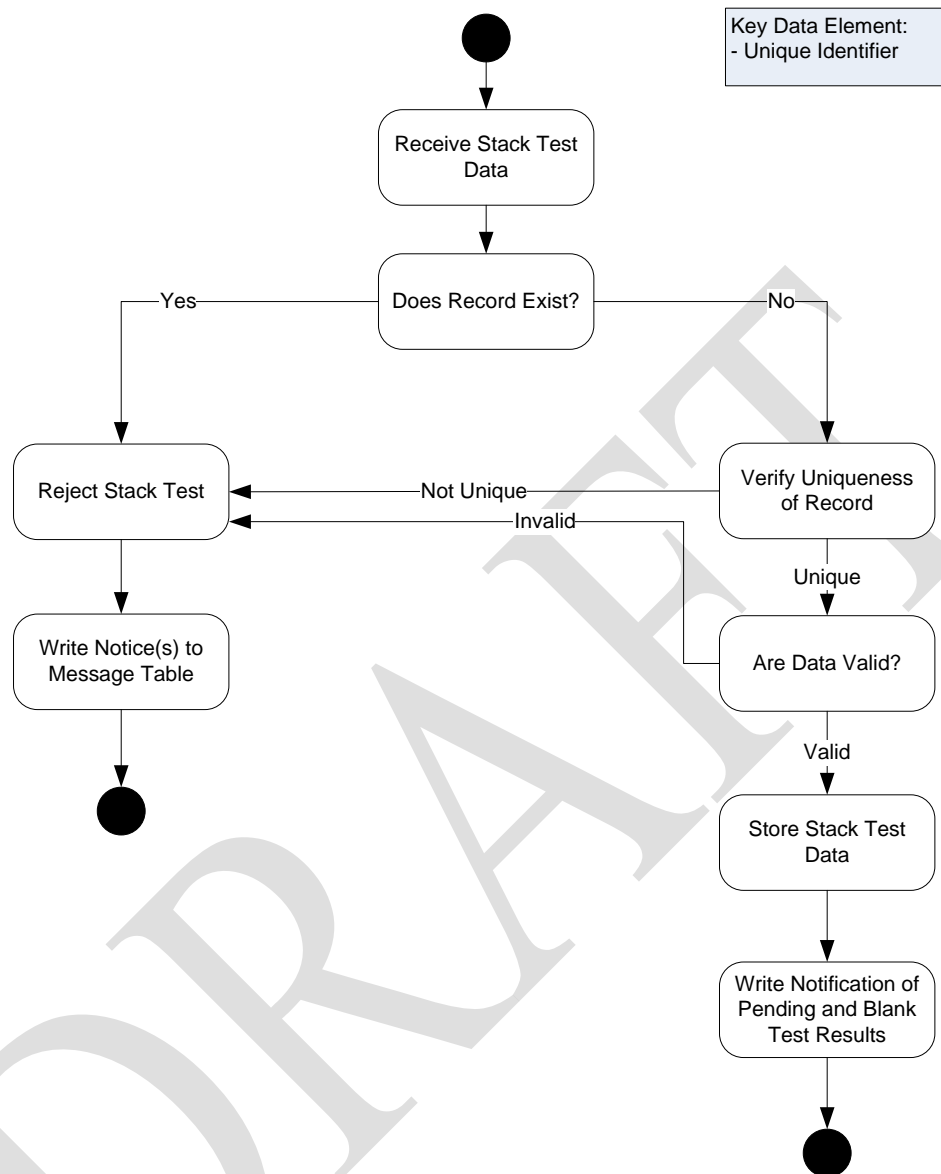
Key Data Element:
- Unique Identifier

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.3.3, Stack Tests Data Elements, and Section 3.2.3.4, Stack Tests Business Rules, for more details.

Users can add a new Stack Test record by:

1. Searching and selecting the Facility ID and then adding the Stack Test record

2. Selecting Add Stack Test on the Home Page and then associating the Facility ID to the Stack Test record

3. Selecting to add a Stack Test on the List Compliance Monitoring screen

4. Selecting to add/link another on the Stack Test screens.

Figure 3.2-17 illustrates the processing required for adding a Stack Test in ICIS-Air online.

Figure 3.2-17. Use Case: Add Stack Test—Web
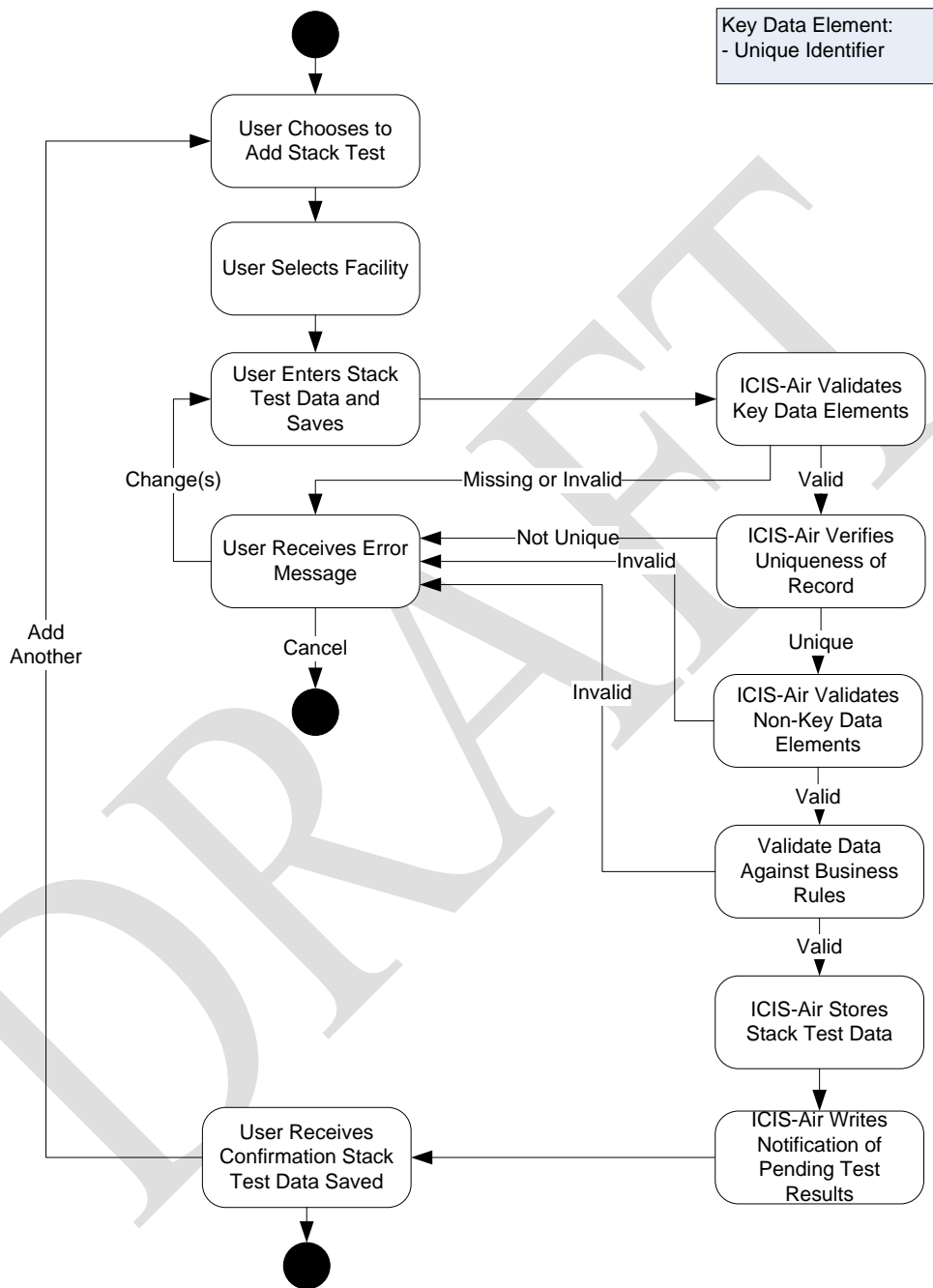
Users must have the Add Stack Tests privileges to add a new Stack Test. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-18. Notional Screen: Add Stack Test

	Parameters/Pollutants Test Results										Manage Test Results

Plus sign (+) indicates parameter/pollutant is not on Facility record.

*Parameter/Pollutant Tested	Air Programs	Method Codes	Allowable Number	Units	Actual Number	Units	Percent	Above/Below Limit	*Test Result	Reason for Failure	Test Result Based on Imported Data

	Contacts and Addresses									Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization

	Comments			Manage Comments

Entered On	Entered By	Comments	Sensitive?

User Defined Fields	Sensitive: ☑

1: ☐

2: [_____]   3: [_____]

4: [_____] 📅   5: [_____] 📅

6: [_____]

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

Save & Exit   Save & Continue   Add/Link Another   Cancel

3.2.3.6 Edit Stack Test

Users can edit a Stack Test within the view and edit screen of the Stack Test record. A user will also have the ability to link the Stack Test to other Compliance Monitoring activities, Enforcement Actions, and Alleged Violation Files from each of the linking screens. Changes and updates to these data elements will result in changes on the displayed fields on the Stack Test screen.

The following data elements are key data elements that uniquely identify a Stack Test record and cannot be edited through the Edit Stack Test transaction:

- Unique Identifier
- Compliance Monitoring Type.

If the Stack Test Status is "Fail", the system will require the following information to be entered for the failed parameter/pollutant:

- Parameter/Pollutant Tested
- Air Program
- Parameter/Pollutant Test Result

Batch

Batch users will have an Edit Stack Test transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.2.3.3 and business rules in Section 3.2.3.4 for more details on rejecting Stack Test edit transactions.

Figure 3.2-19 illustrates the processing required for editing a Stack Test in ICIS-Air through a batch transaction.

**Figure 3.2-19. Use Case: Edit Stack Test—Batch**
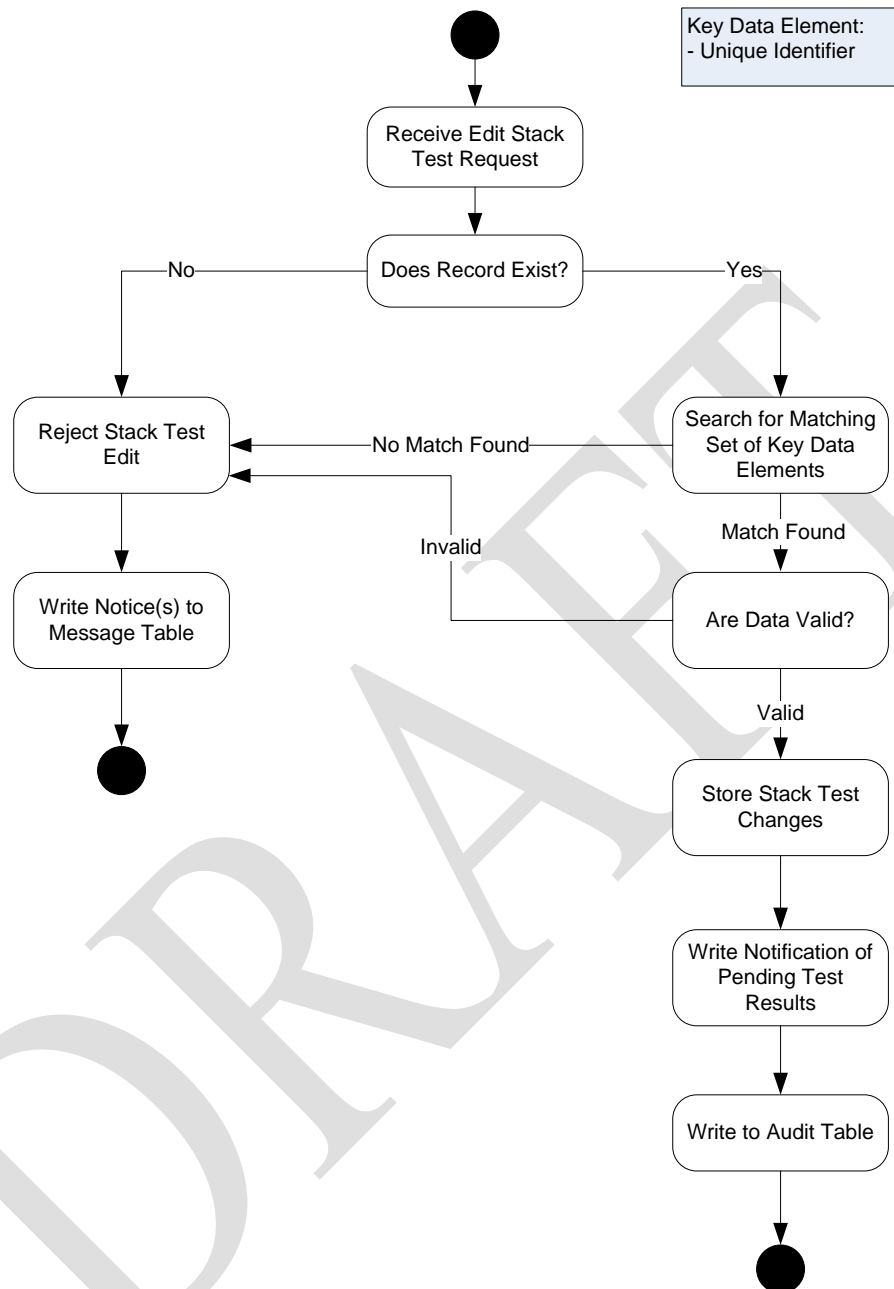
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.3.3, Stack Tests Data Elements, and Section 3.2.3.4, Stack Tests Business Rules, for more details.

Users can edit a Stack Test record by:

1. Entering the Stack Test Unique Identifier and clicking on Jump To on the Home Page

2. Searching for the Stack Test record on the Search Compliance Monitoring Activities screen and then selecting the Stack Test record on the List Compliance Monitoring Activities screen

3. Searching and selecting the Facility ID and then selecting the Stack Test record.

Figure 3.2-20 illustrates the processing required for editing a Stack Test in ICIS-Air online.

Figure 3.2-20. Use Case: Edit Stack Test—Web
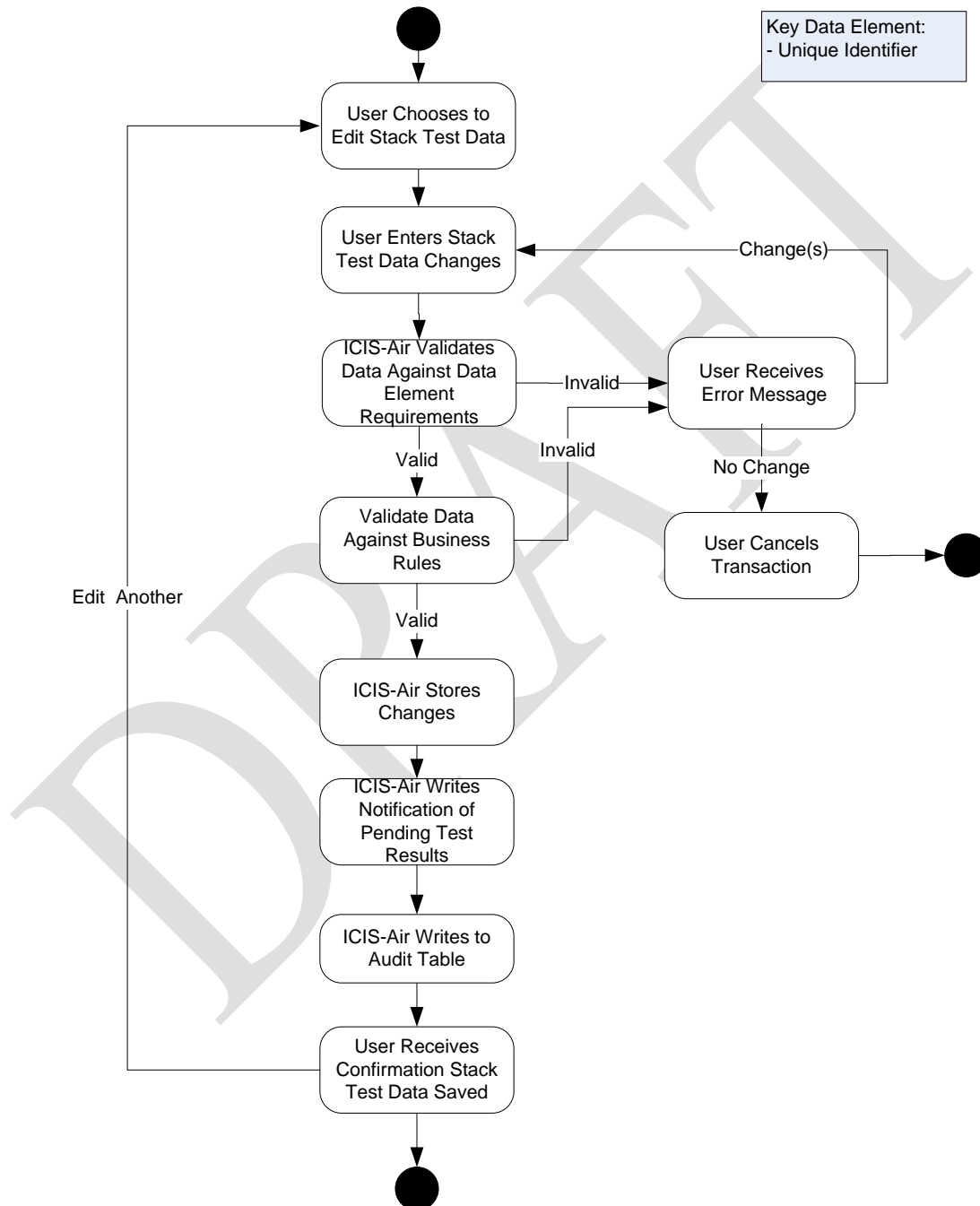
Users must have the Edit Stack Tests role to edit an existing Stack Test. Figure 3.2-21 shows the Edit Stack Test notional screen. Note: The figure is one continuous screen but broken into multiple figures for legibility. System-generated data elements of Contains Pollutant with Pending Status and Data Imported from External System are appear as grey since these fields are not editable by the user.

Figure 3.2-21. Notional Screen: Edit Stack Test

Plus sign (+) indicates parameter/pollutant is not on Facility record.

Parameters/Pollutants Test Results

Manage Test Results

*Parameter/Pollutant Tested	Air Programs	Method Codes	Allowable Number	Units	Actual Number	Units	Percent	Above/Below Limit	*Test Result	Reason for Failure	Test Result Based on Imported Data
Carbon Monoxide	State Implementation Plan (SIP)	Method 3A - CO2, O2 - Instrumental	35	ppm	40	ppm	14.29%	Above Limit	Fail		No
Nitrogen Oxides	New Source Performance Standards	Method 7 - Nitrogen Oxide (NOx); Method 20 - NOx from Stationary Gas Turbines	53	ppb					Pending		No
Lead	New Source Performance Standards; MACT	Method 12 - Inorganic Lead; Method 101 - Mercury from Chlor-Alkali Plants (Air); more…	.10	µg/m3	.12	µg/m3	20%	Above Limit	Fail		No
Moisture	State Implementation Plan (SIP)								Fail	High levels of moisture	No
+PM2.5	State Implementation Plan (SIP)	Method 3A - CO2, O2 - Instrumental							Incomplete		No

Contacts and Addresses

Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization
Smith	John	Douglas	Stack Tester	1234 Main Street, Raleigh, NC	542-123-4455			Regional Office	Source Testing

Comments

Manage Comments

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Henri	Waiting on one more Test Result.	

User Defined Fields   Sensitive: ☐

1: ☑

2: [ ]   3: [ ]

4: 11/01/2009   5: [ ]

6: User defined description.

Created By: John Smith Created Date: 02/01/2010
Last Modified By: John Smith Last Modified Date: 06/01/2010

Save & Exit   Save & Continue   Add/Link Another   Cancel

Figure 3.2-22 shows the user interface for viewing a Stack Test record that was imported from the electronic reporting repository. Note: The figure is one continuous screen but broken into multiple figures for legibility. External system-supplied Stack Test data are read-only and grayed out.

Figure 3.2-22. Notional Screen: Edit Imported Stack Test

Users will have the ability to add, edit, or delete Stack Test pollutant test results by clicking on the Manage Pollutant Test Results button. Figure 3.2-23 shows the List of Pollutants Test Results screen.

Figure 3.2-23. Notional Screen: List of Pollutants Test Results

Figure 3.2-24 shows the edit Pollutant Test Results notional screen if users choose to edit a pollutant's test result. Note: The Actual Units value defaults to the Allowable Units value and Percent and Above/Below Limit are system generated.

Figure 3.2-24. Notional Screen: Edit Pollutant Test Results

3.2.3.7 *Delete Stack Test*

When users delete a Stack Test, the Stack Test and all child records for that Compliance Monitoring activity will be deleted. The child records include:

- Links to Evaluations
- Links to Investigations
- Links to Information requests
- Links to TV ACCs
- Links to Stack Tests
- Links to Enforcement Actions
- Links to Alleged Violation Files.

Batch

Batch users will have Delete Stack Tests transactions rejected if the record does not exist or the business rules are violated.

Figure 3.2-25 illustrates the processing required for deleting a Stack Test from ICIS-Air through a batch transaction.

Figure 3.2-25. Use Case: Delete Stack Test—Batch
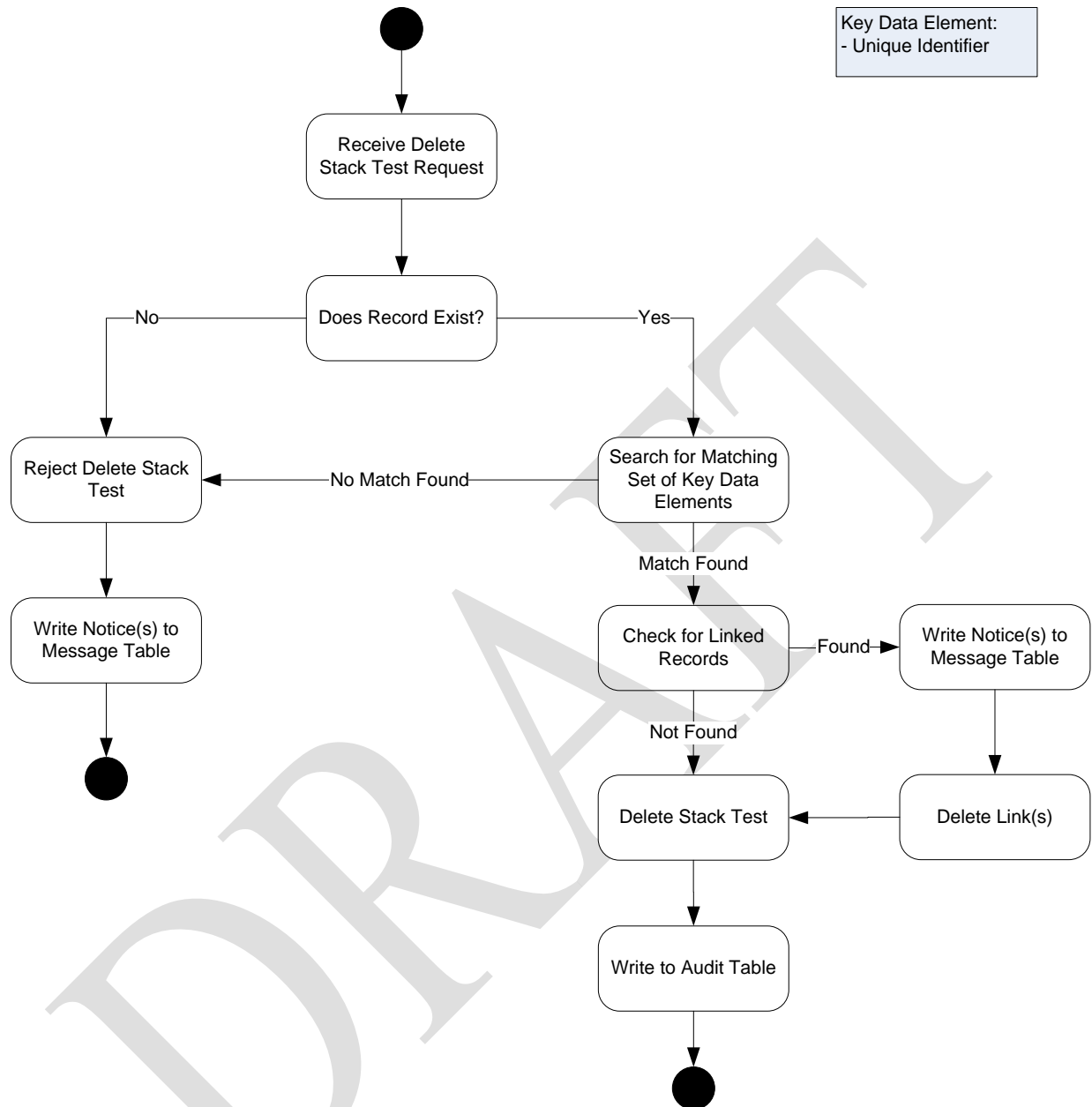
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Users can delete a Stack Test record by searching for the Stack Test record on the Search Compliance Monitoring Activities screen and then selecting the Delete link next to the Stack Test record on the List Compliance Monitoring Activities screen.

Figure 3.2-26 illustrates the processing required for deleting a Stack Test from ICIS-Air online.

Figure 3.2-26. Use Case: Delete Stack Test—Web
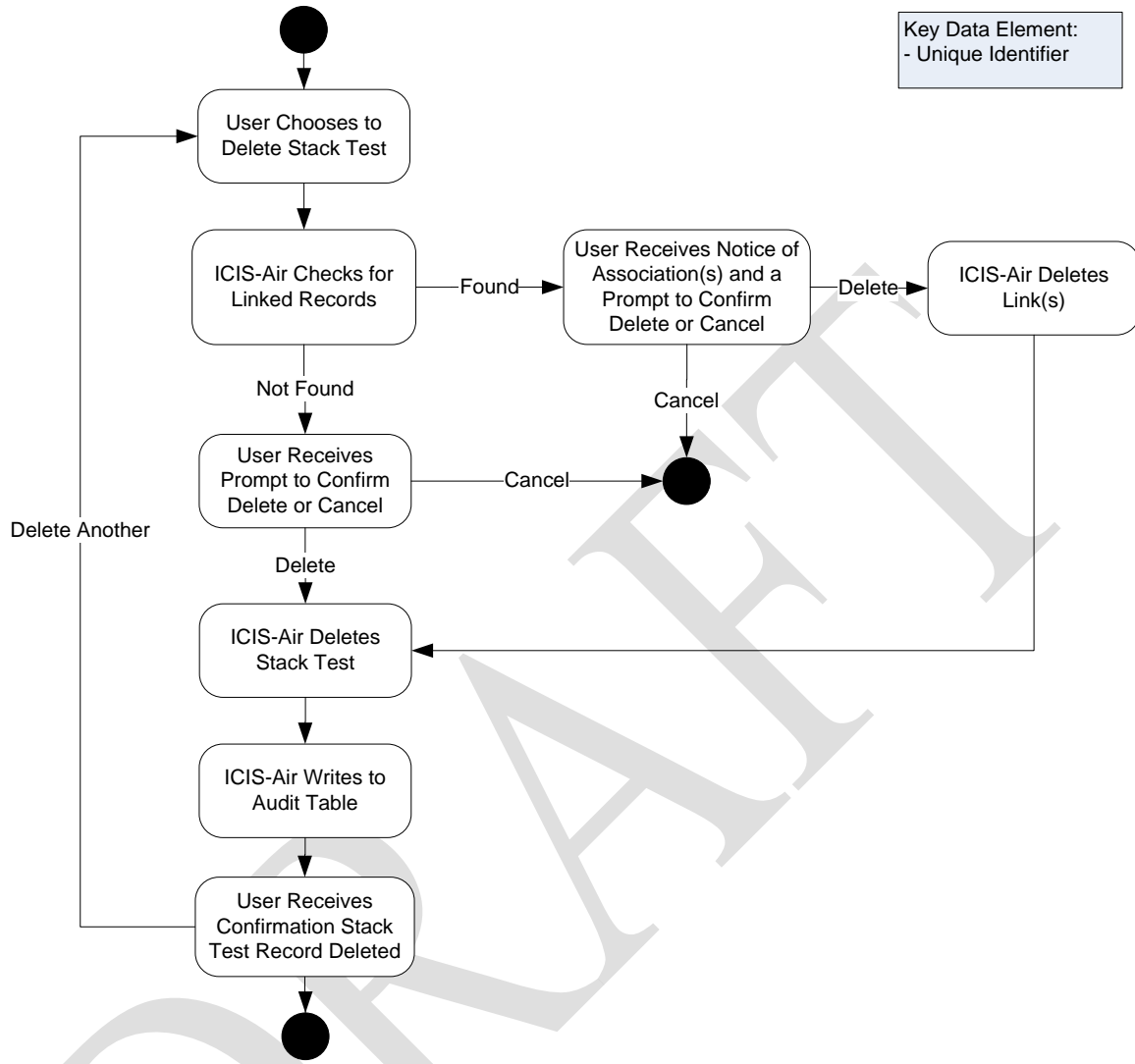
3.2.3.8 Stack Test Method Codes

Method Codes
Method 1 - Traverse Points
Method 1A - Small Ducts
Method 2 - Velocity - S-type Pitot
Method 2A - Volume Meters
Method 2B - Exhaust Volume Flow Rate
Method 2C - Standard Pitot
Method 2D - Rate Meters
Method 2E - Landfill Gas Production Flow Rate
Method 2F - Flow Rate Measurement with 3-D Probe
Method 2G - Flow Rate Measurement with 2-D Probe
Method 2H - Flow Rate Measurement with Velocity Decay Near Stack Walls
Memo - New Test Procedures of Stack Gas Flow Rate in Place of Method 2
Method 3 - Molecular Weight
Method 3A - CO2, O2 - Instrumental
Method 3B - CO2, O2 - Orsat
Method 3C - CO2, CH4, N2, O2 - TCD
Method 4 - Moisture Content
Method 5 - Particulate Matter(PM)
Method 5A - PM Asphalt Roofing
Method 5B - PM Nonsulfuric Acid
Method 5D - PM Baghouses (Particulate Matter)
Method 5E - PM Fiberglass Plants (Particulate Matter)
Method 5F - PM Fluid Catalytic Cracking Unit
Method 5G - PM Wood Heaters from a Dilution Tunnel
Method 5H - PM Wood Heaters from a Stack
Method 5I - Determination of Low Level Particulate Matter Emissions
Method 6 - Sulfur Dioxide (SO2)
Method 6A - SO2, CO2
Method 6B - SO2, CO2 - Long Term Integrated
Method 6C - SO2 - Instrumental
Method 7 - Nitrogen Oxide (NOx)
Method 7A - NOx - Ion Chromatographic Method
Method 7B - NOx - Ultraviolet Spectrophotometry
Method 7C - NOx - Colorimetric Method
Method 7D - NOx - Ion Chromatographic
Method 7E - NOx - Instrumental
Method 8 - Sulfuric Acid Mist
Method 9 - Visual Opacity
Method 10 - Carbon Monoxide (NDIR)
Method 10A - CO for Certifying CEMS
Method 10B - CO from Stationary Sources
Method 11 - H2S Content of Fuel

Method Codes
Method 12 - Inorganic Lead
Method 13A - Total Fluoride (SPADNS Zirconium Lake)
Method 13B - Total Fluoride (Specific Ion Electrode)
Method 14 - Fluoride for Primary Aluminum Plants
Method 14A - Total Fluoride Emissions from Selected Sources at Primary Aluminum Plants
Method 15 - Hydrogen Sulfide, Carbonyl Sulfide, and Carbon Disulfide
Method 15A - Total Reduced Sulfur (TRS Alt.)
Method 16 - Sulfur (Semicontinuous Determination)
Method 16A - Total Reduced Sulfur (Impinger)
Method 16B - Total Reduced Sulfur (GC Analysis)
Method 17 - In-Stack Particulate (PM)
Method 18 - VOC by GC
Method 19 - SO2 Removal & PM, SO2, NOx Rates from Electric Utility Steam Generators
Method 20 - NOx from Stationary Gas Turbines
Method 21 - VOC Leaks
Method 22 - Fugitive Opacity
Method 23 - Dioxin and Furan (02/91 FR Copy)
Method 24 - Surface Coatings
Method 24A - Publication Rotogravure Inks and Related Publication Rotogravure Coatings
Method 25 - Gaseous Nonmethane Organic Emissions
Method 25A - Gaseous Organic Concentration (Flame Ionization)
Method 25B - Gaseous Organic Concentration (Infrared Analyzer)
Method 25C - NMOC in Landfill Gases
Method 25D - VOC of Waste Samples
Method 25E- Vapor Phase Organic Concentration in Waste Samples
Method 26 - Hydrogen Chloride, Halides, Halogens
Method 26A - Hydrogen Halide & Halogen-Isokinetic
Method 27 - Vapor Tightness of Gasoline Tank-Pressure Vacuum
Method 28 - Certification and Auditing - Wood Heaters
Method 28A - Air to Fuel Ratio, Burn Rate - Wood-fired Appliances
Method 29 - Metals Emissions from Stationary Sources
Method 30A - Determination of Mercury from Coal-Fired Combustion Sources (Instrumental Analyzer Procedure)
Method 30B - Determination of Mercury from Coal-Fired Combustion Sources Using Carbon Sorbent Traps
Method 101 - Mercury from Chlor-Alkali Plants (Air)
Method 101A - Mercury from Sewage Sludge Incinerators
Method 102 - Mercury from Chlor-Alkali Plants (Hydrogen Streams)
Method 103 - Beryllium Screening Method
Method 104 - Beryllium Emissions Determination
Method 105 -Mercury in Wastewater Treatment Plant Sewage Sludge
Method 106 - Determination of Vinyl Chloride
Method 107 - Vinyl Chloride content of In process Wastewater Samples
Method 107A - Vinyl Chloride content of Solvents
Method 108 - Particulate & Gaseous Arsenic emissions

Method Codes
Method 108A - Determination of Arsenic Content in Ore Samples from Nonferrous Smelters
Method 108B - Arsenic
Method 108C - Arsenic
Method 111 - Polonium-210 Emissions
Method 114 - Radionuclide Emissions
Method 115 - Radon-222 Emissions
Method 201 - PM10
Method 201A - PM10 and PM2.5 (In-stack, CRS) (Revised 12-1-2010)
Method 202 - Condensable Particulate Matter (Revised 12-1-2010)
Methods 203A, B, and C - Opacity Determination for Time-Averaged Regulations
Method 204-204f Preamble.
Method 204 - Permanent or Temporary Total Enclosure (TTE) for Determining Capture Efficiency
Method 204A - VOCs in Liquid Input Stream
Method 204B - VOCs in Captured Stream
Method 204C - VOCs in Captured Stream (Dilution Technique)
Method 204D - Fugitive VOCs from Temporary Total Enclosure
Method 204E - Fugitive VOCs from Building Enclosure
Method 204F - VOCs in Liquid Input Stream (Distillation)
Method 205 - Gas Dilution Device Certification Procedure
Method 207 - Presurvey for Corn Wet-Milling Facilities
Method 301 - Method Validation Protocol
Method 303 - By-product Coke Oven Batteries
Method 303A - Nonrecovery Coke Oven Batteries
Method 304A - Biodegradation Rates-Vent Option
Method 304B - Biodegradation Rates - Scrubber Option
Method 305 - Potential VOC in Waste
Method 306 - Chromium Emissions Electroplating/Anodizing
Method 306A - Chromium Emissions Electroplating/Anodizing (Mason Jar Method)
Method 306B - Surface Tension for Tanks Electroplating/Anodizing
Method 307 - Emissions from Solvent Vapor Cleaners (Dec. 2, 1994)
Method 308 - Methanol Emissions (Appeared in Federal Register 11/14/97)
Method 310A - Residual Hexane
Method 310B - Residual Solvent
Method 310C - Residual N-Hexane in EDPM Rubber
Method 311 - HAPS in Paints & Coatings
Method 312A - Styrene in SBR Latex (GC)
Method 312B - Styrene in SBR Latex by Capillary GC
Method 312C - Styrene in SBR Latex Produced by Emulsion Polymerization
Method 313A - Residual Hydrocarbon in Rubber Crumb
Method 313B - Residual HC in Rubber Crumb by Capillary GC
Method 315 - PM and MCEM from Aluminum Production Facilities
Method 316 - Sample & Analysis for Formaldehyde emissions in the Mineral Wool & Wool Fiberglass Industries
Method 318 - Extractive FTIR Method for Measurement of Emissions from the Mineral Wool and Wool Fiberglass Industries

Method Codes
Method 320 - Vapor Phase Organic & Inorganic Emissions by Extractive FTIR
Method 321 - Gaseous HCl Emissions at Portland Cement Kilns by FTIR
Method 323 - Formaldehyde

3.2.4 Title V Annual Compliance Certifications

TV ACCs are a type of compliance monitoring activity performed by facilities with Title V permits to ensure the Facilities' compliance to regulatory requirements. Facilities are required to submit TV ACCs to the regulating Agency per the schedule outlined in the permit, usually once a year on an Agency-wide basis or on the anniversary of the permit. Copies of the TVACC are sent to the EPA Regional Office and the Delegated Agency for review. TV ACC submission continues under an administratively continued permit until such time as the new permit is issued or denied.

The requirements, functionality, data elements, and business rules that support the processing of TV ACCs are detailed in the following subsections.

3.2.4.1 Summary of TV ACCs Modernization in ICIS-Air

Some TV ACC functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Phased Approach for Entering TV ACC Records**
  Users will have the option to enter data for TV ACC records all at once or in phases:
  1. Users enter the "parent" TV ACC record, which includes the Facility, Permit, and Review Period.
  2. When a TV ACC is received by the Delegated Agency or the EPA Headquarters, the data for TV ACC Review Information are entered by each reviewer.
  3. When a TV ACC review is completed, either the Delegated Agency or the EPA Headquarters can enter the status of the TV ACC, which includes the Facility Reported Status and Link to the TV ACC report.

- **Permit Data**
  In legacy AFS, Permit ID is not a minimum data requirement and additional permit data is not required to be entered. In ICIS-Air, Permit ID will be a conditional minimum data requirement and users are required to enter Permit ID for a TV ACC record if the Facility has multiple Permits in order to correctly identify the TV ACC certification review period for the associated Permit. Users also are encouraged, but not required, to enter additional data for the associated permit. If the Permit ID already exists in the system, ICIS-Air will automatically link the Permit ID to the existing permit. If the Permit ID does not exist in the system, ICIS-Air will add the Permit ID to the Permit table and users have the option to view and edit this permit on the Edit Permit screen. Permits added from TV ACC records must conform to the Permits business rules when users choose to edit the permit.

- **Capture Multiple TV ACC Reviews and Reviewers**
  In legacy AFS, details of review statuses and reviewers are not captured for each TV ACC review period. ICIS-Air will allow users to track multiple reviews and the

reviewers' information each time a TV ACC is reviewed. Once a user has completed the review of a TV ACC, they can enter the following information regarding the review:

- Received Date: Users enter the date when the TV ACC was received.
- Reviewed On: Users enter the date when the TV ACC review was conducted.

- **Did Facility Report Deviations:** Users can specify whether the Facility had indicated deviations exist in the TV ACC report.
- **Excess Emissions:** Users indicate whether Excess Emissions exist as a result of the review.
- **Reviewer Comments:** Users enter additional comments on the TV ACC review.
- **Reviewer Agency and Reviewed By:** This information will default to the information of the user currently entering the TV ACC data but users have the option to change the default data.
- **Facility Reported Compliance Status**

  In legacy AFS, results are tracked as In Compliance, In Violation, or Unknown for the TV ACC record. In ICIS-Air, users may track the results of review by indicating whether the Facility Reported Compliance Status is Continuous or Intermittent in accordance to the TV ACC policy based on the TV ACC reviews.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of TV ACCs in ICIS-Air.

3.2.4.2   TV ACCs Functional Requirements

Table 3.2-10 lists the requirements that apply to TV ACCs. It includes functions that are allowed and business rules within a function.

Table 3.2-10. ICIS-Air TV ACCs Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.1, 5.5.4, 5.7.2, 5.7.3, 5.9.1, 5.9.11	EPA SRS	The system shall allow the user to view TV ACC data.	ICIS-Air version 1.0
2.	5.7.2, 5.7.3, 5.9.1, 5.9.11	EPA SRS	The system shall allow the user to add a new TV ACC record.	ICIS-Air version 1.0
3.	5.7.2, 5.7.3, 5.9.1, 5.9.11	EPA SRS	The system shall allow the user to edit existing TV ACC data.	ICIS-Air version 1.0
4.	5.9.1, 5.9.11	EPA SRS	The system shall allow the user to delete an existing TV ACC record.	ICIS-Air version 1.0
5.	5.14.2	EPA SRS	The system shall allow the user to access the Add TV ACC screen from the homepage.	ICIS-Air version 1.0
6.	5.14.2	EPA SRS	The system shall populate the Add TV ACC screen with the Permit ID if the Add TV ACC originated from the Permit screen.	ICIS-Air version 1.0
7.	5.4.1, 5.7.2,	EPA SRS	The system shall display the following data elements on the	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

	5.7.3, 5.9.1, 5.9.11		TV ACC screen:
			Parent TV ACC Record:
			• Unique Identifier
			• Facility ID
			• Facility Name
			• Facility Address
			• Permit ID
			• Permit Conditions
			• Certification Period Start Date
			• Certification Period End Date
			• Due Date
			• Facility Reported Compliance Status
			• Link to Document
			• Comments
			  – Comment
			  – Entered On
			  – Entered By
			  – Sensitive?
			• User Defined Field 1
			• User Defined Field 2
			• User Defined Field 3
			• User Defined Field 4
			• User Defined Field 5
			• User Defined Field 6
			• UDF Sensitive Flag
			• Contacts and Addresses
			  – Last Name
			  – First Name
			  – Middle Name
			  – Role
			  – Address
			  – Phone
			  – Fax
			  – E-mail
			  – Office
			  – Organization
			Child TV ACC Record:
			• Received Date
			• Reviewed On
			• Did Facility Report Deviations?
			• Excess Emissions?
			• Reviewer Comments
			• Reviewer Agency
			• Reviewed By	

8.	5.9.11	EPA SRS	The system shall enforce the security model for the users to view, add, edit, and delete a TV ACC. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
9.	N/A	N/A	The system shall allow the user to enter a Permit ID that already exists in the system for a TV ACC record.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
10.	5.9.11	EPA SRS	The system shall allow the user to enter a Permit ID that does not exist in the system for a TV ACC record.	ICIS-Air version 1.0
11.	5.7.2, 5.7.3, 5.9.11	EPA SRS	The system shall allow the user to enter zero or many reviews for a TV ACC record.	ICIS-Air version 1.0
12.	N/A	SME Meeting	The system shall allow the user to enter multiple comments for a TV ACC record.	ICIS-Air version 1.0

3.2.4.3 TV ACCs Data Requirements

Table 3.2-11 lists the data element requirements that apply to TV ACCs. This table includes the system, minimum data requirements, and possible future data elements. Note: References to REF tables are place holders and values for the REF tables will be reviewed during the Design phase.

Table 3.2-11. ICIS-Air TV ACCs Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
1.	Y	Y	Y	N	N/A	Unique Identifier • User Defined or System Generated • Alphanumeric (15)
2.	N	N	N	Y	N/A	Activity Type • Valid Value: – Title V Annual Compliance Certification
3.	N	Y	Y	N	5.9.11	Facility ID • Foreign Key of Linked Facility
4.	N	N	C	N	5.9.11	Permit ID • User Defined • Alphanumeric (15) • Conditionally programmatically required if Facilities have multiple Permits • System Generated if TVACC record is added from Permit screen
5.	N	N	Y	N	5.9.11	Due Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
6.	N	Y	Y	N	5.9.11	Certification Period Start Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
7.	N	Y	Y	N	5.9.11	Certification Period End Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
8.	N	N	N	N	5.9.11	Agency • Valid Values: – U.S. EPA – State – Tribe – Local Government • Default to User's Agency

ID	Key?	SR	PR	SG	Client Req ID	Requirement
9.	N	N	Y	N	N/A	Facility Reported Compliance Status • Valid Values: – Blank (Default) – Continuous – Intermittent
10.	N	N	N	N	5.9.11	Link to Document • URL to Document
11.	N	N	N	N	5.9.11	Comments • Multiple for a TV ACC record • Alphanumeric (500) • Free-form text
12.	N	N	N	Y	N/A	Comment Entered On • Date
13.	N	N	N	Y	N/A	Comment Entered By • Alphanumeric (50)
14.	N	N	N	N	N/A	Sensitive Comment • Alphanumeric (1) • Valid Values: – N – Y (Default)
15.	N	N	N	N	5.9.11	User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
16.	N	N	N	N	5.9.11	User Defined Field 2 • Alphanumeric (100) • Free-form text
17.	N	N	N	N	5.9.11	User Defined Field 3 • Alphanumeric (100) • Free-form text
18.	N	N	N	N	5.9.11	User Defined Field 4 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
19.	N	N	N	N	5.9.11	User Defined Field 5 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
20.	N	N	N	N	5.9.11	User Defined Field 6 • Alphanumeric (500) • Free-form text
21.	N	Y	Y	N	5.9.11	Reviewed On • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
22.	N	N	Y	N	5.9.11	Received Date • Date – Batch: Must be valid date in yyyy-mm-dd format

ID	Key?	SR	PR	SG	Client Req ID	Requirement
						– Web: Must be valid date in mm/dd/yyyy format
23.	N	N	N	N	5.9.11	Did Facility Report Deviations? • Alphanumeric (1) • Valid Values: – Blank (Default) – N – Y
24.	N	N	N	N	N/A	Excess Emissions • Alphanumeric (1) • Valid Values: – Blank (Default) – N – Y
25.	N	N	N	N	N/A	Reviewer Comments • Alphanumeric (500) • Free-form text
26.	N	N	N	N	5.9.11	Reviewer Agency • Defaults to user's Agency • Valid Values: – U.S. EPA – State – Tribe – Local Government
27.	N	N	N	N	N/A	Reviewed By • Defaults to User's Last Name, First Name, and Middle Name • Alphanumeric (60) • Free-form text
28.	N	N	N	Y	N/A	Contacts Affiliation Type • Valid Value: – Reviewer
29.	N	N	N	N	N/A	Contacts ID • Defaults to User's Contacts ID • Must be validated against Contacts table
30.	N	N	N	N	N/A	Permit Conditions • Alphanumeric (100) • Free-form text
31.	N	N	N	N	N/A	Sensitive UDF • Alphanumeric (1) • Valid Values: – N – Y (Default)
32.	N	N	N	Y		Created By • System Generated based upon User ID
33.	N	N	N	Y		Created Date • System Generated • Date
34.	N	N	N	Y		Last Modified By • System Generated based upon User ID

ID	Key?	SR	PR	SG	Client Req ID	Requirement
35.	N	N	N	Y		Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/Conditional/No); SG = System Generated (Yes/No).

3.2.4.4 TV ACCs Business Rule Requirements

Table 3.2-12 lists the business rules requirements that apply to TV ACCs. This table includes the business rules for data elements and error handling.

Table 3.2-12. ICIS-Air TV ACCs Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.7.2, 5.7.3, 5.9.1, 5.9.11	The system shall ensure that the TV ACC is associated to an existing Facility.	ICIS-Air version 1.0
2.	5.7.2, 5.7.3, 5.9.1, 5.9.11	The system shall allow the user to enter multiple TV ACC records for a Facility.	ICIS-Air version 1.0
3.	5.7.2, 5.7.3, 5.9.1, 5.9.11	The system shall ensure multiple review records can exist for a TV ACC Unique Identifier.	ICIS-Air version 1.0
4.	5.7.2, 5.7.3, 5.9.1, 5.9.11	The system shall ensure that the Permit ID entered for a TV ACC record can be an existing permit or a new permit.	ICIS-Air version 1.0
5.	5.7.2, 5.7.3, 5.9.1, 5.9.11	The system shall ensure that the associated existing Permit has a Title V permit category.	ICIS-Air version 1.0
6.	5.7.2, 5.7.3, 5.9.1, 5.9.11	The system shall add the Permit ID to the Permit table if the Permit ID does not already exist in the system.	ICIS-Air version 1.0
7.	N/A	The system shall automatically link an existing Permit ID to the Permit ID on the TV ACC record if they match.	ICIS-Air version 1.0
8.	N/A	The system shall set the Activity Type to Title V Annual Compliance Certification for TV ACC records.	ICIS-Air version 1.0
9.	N/A	The system shall ensure that the Certification Period End Date is greater than the Certification Period Start Date.	ICIS-Air version 1.0
10.	N/A	The system shall ensure that the Due Date is greater than or equal to the Review Period End Date.	ICIS-Air version 1.0
11.	N/A	The system shall ensure that the Received Date is greater than or equal to the Review Period End Date.	ICIS-Air version 1.0
12.	N/A	The system shall ensure that the Reviewed On date is greater than or equal to the Received Date.	ICIS-Air version 1.0
13.	5.9.2	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new TV ACC data.	ICIS-Air version 1.0
14.	5.1.7	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all new TV ACC data.	ICIS-Air version 1.0
15.	N/A	The system shall require the user to enter the Permit ID if multiple TV ACC exists for the same Facility ID, Certification Period Start Date, and Certification End Date.	ICIS-Air version 1.0

3.2.4.5   Add TV ACCs

Users may enter a TV ACC only against an existing Facility. Data for TV ACCs will be captured in ICIS-Air under Compliance Monitoring. Users must have the Add TV ACCs privileges to add a new TV ACC.

A TV ACC is uniquely identified by the following key data elements:

- Unique Identifier

The following data elements are required to add a new TV ACC in ICIS-Air:

- Unique Identifier
- Facility ID
- Certification Period Start Date
- Certification Period End Date
- Permit ID, if the Facility has more than one Permit

Users must provide the Permit ID when entering a new TV ACC record if the Facility has more than one associated Permit; however, the Permit ID can be an existing Permit in ICIS-Air or a new Permit ID that has not yet been entered into the system. Once users save the TV ACC data, ICIS-Air will automatically add the Permit ID in addition to the TV ACC data if the associated permit record does not already exist.

Batch

Batch users will have an Add TV ACC transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.4.3, TV ACCs Data Elements, and Section 3.2.4.4, TV ACCs Business Rules, for more details.

Figure 3.2-27 illustrates the processing required for adding a TV ACC to ICIS-Air through a batch transaction.

Figure 3.2-27. Use Case: Add TV ACC—Batch
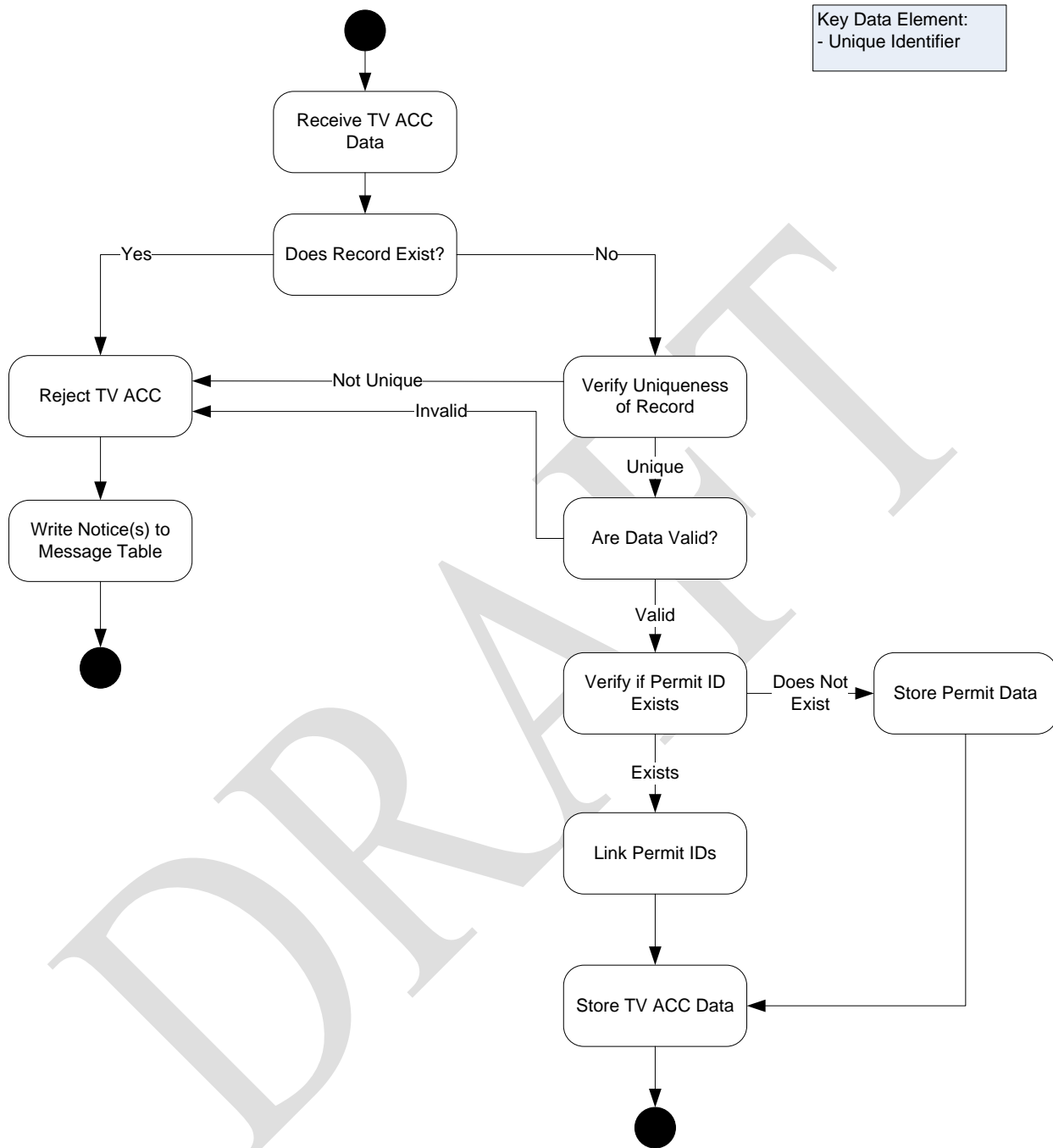
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.4.3, TV ACCs Data Elements, and Section 3.2.4.4, TV ACCs Business Rules, for more details.

Users can add a new TV ACC record by:

1. Searching and selecting the Facility ID and then adding the TV ACC record

2. Selecting Add TV ACC on the Home Page and then associating the Facility ID to the TV ACC record

3. Selecting to add a TV ACC on the List Compliance Monitoring screen

4. Selecting to add/link another on the TV ACC screens.

Figure 3.2-28 illustrates the processing required for adding a TV ACC in ICIS-Air online.

Figure 3.2-28. Use Case: Add TV ACC—Web
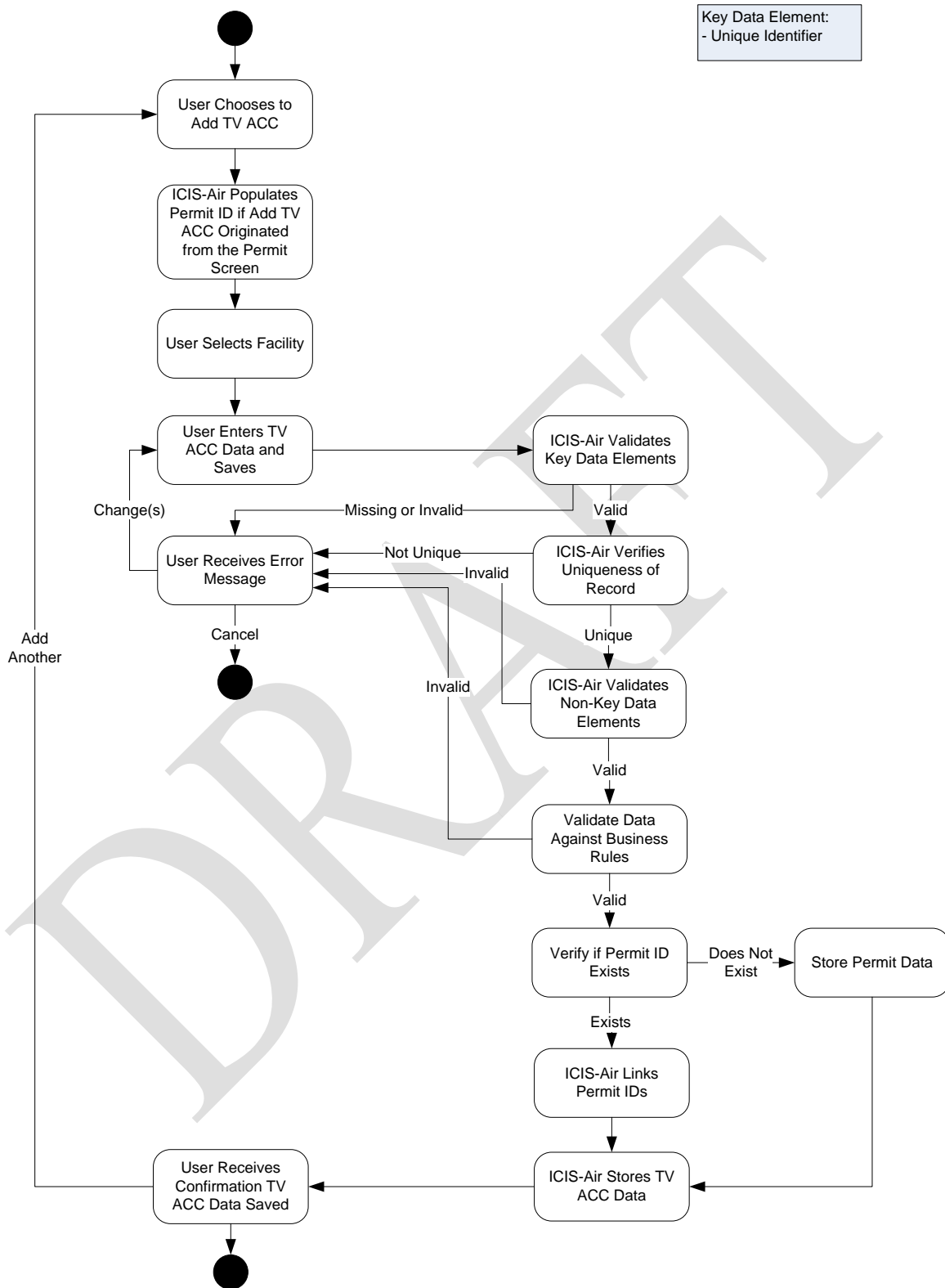
Figure 3.2-29 shows the notional Add TV ACC screen. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-29. Notional Screen: Add TV ACC

TV ACC Review Information							Manage Reviews
Received Date	Reviewed On	Did Facility Report Deviations?	Excess Emissions?	Reviewer Comments	Reviewer Agency	Reviewed By	

Contacts and Addresses									Manage Contacts
Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization

Comments				Manage Comments
Entered On	Entered By	Comments	Sensitive?	

User Defined Fields   **Sensitive:** ☑

1: ☑

2: [   ]   3: [   ]

4: [   ] 📅   5: [   ] 📅

6: [   ]

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

[Save & Exit] [Save & Continue] [Add/Link Another] [Cancel]

3.2.4.6   *Edit TV ACC*

Users can edit a TV ACC within the view and edit screen of the TV ACC record. A user also will have the ability to link the TV ACC to other Compliance Monitoring activities, Enforcement Actions, and Alleged Violation Files.

The following data elements are key data elements that uniquely identify a TV ACC record and cannot be edited through the Edit TV ACC transaction:

- Unique Identifier
- Activity Type.

Batch

Batch users will have an Edit TV ACC transaction rejected when system-required data elements are missing or invalid and edit checks and/or business rules are violated. See Section 3.2.4.3, TV ACCs Data Elements, and Section 3.2.4.4, TV ACCs Business Rules, for more details on rejecting TV ACC edit transactions.

Figure 3.2-30 illustrates the processing required for editing a TV ACC in ICIS-Air through a batch transaction.

Figure 3.2-30. Use Case: Edit TV ACC—Batch
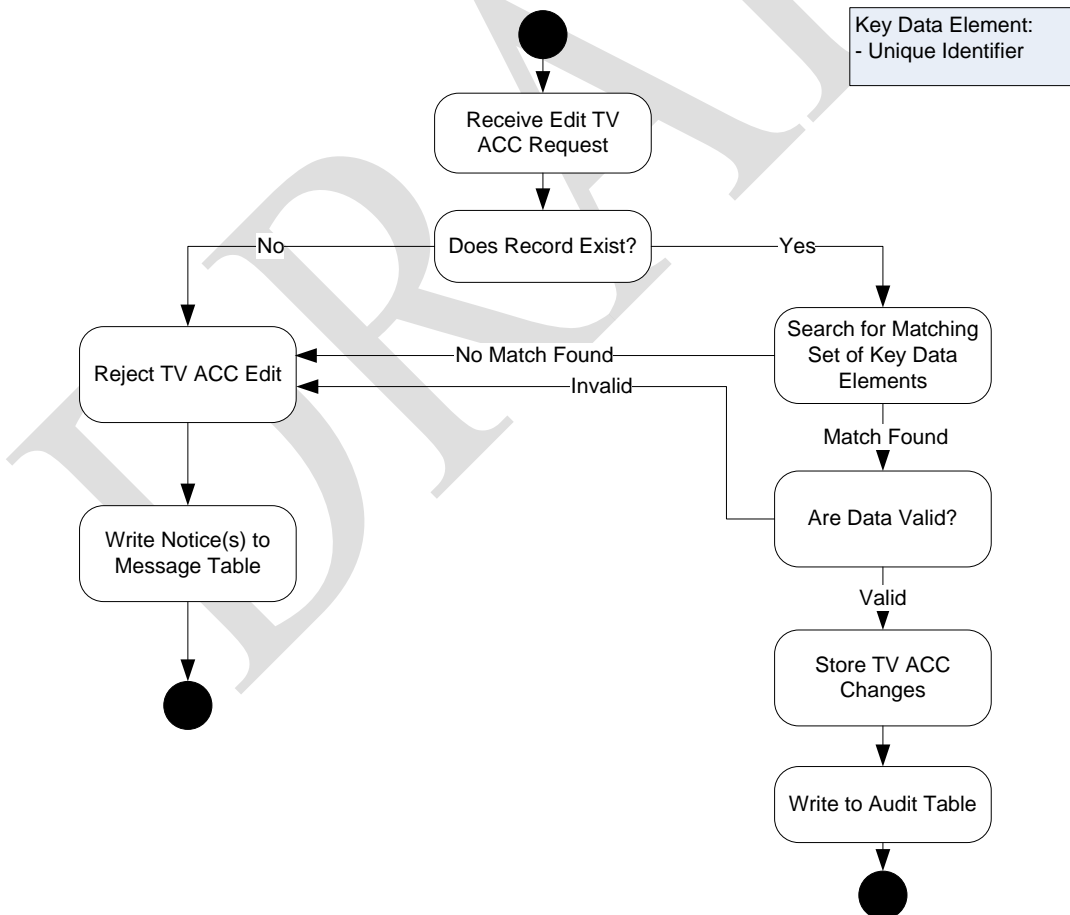
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.2.4.3, TV ACCs Data Elements, and Section 3.2.4.4, TV ACCs Business Rules, for more details.

Users can edit a TV ACC record by:

1. Entering the TV ACC Unique Identifier and clicking on Jump To on the Home Page

2. Searching for the TV ACC record on the Search Compliance Monitoring Activities screen and then selecting the TV ACC record on the List Compliance Monitoring Activities screen

3. Searching and selecting the Facility ID and then selecting the TV ACC record.

Figure 3.2-31 illustrates the processing required for editing a TV ACC in ICIS-Air online.

Figure 3.2-31. Use Case: Edit TV ACC—Web
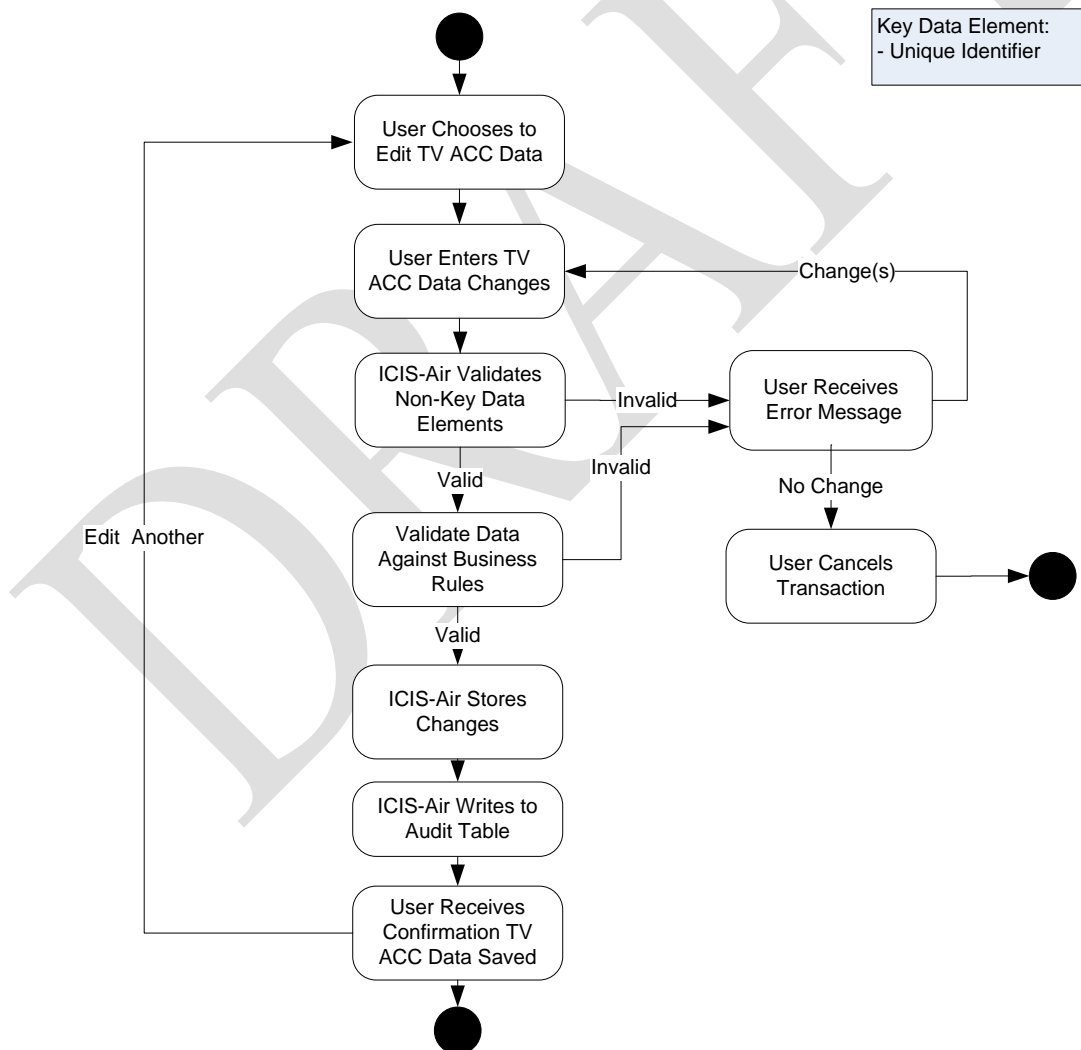
Users must have the Edit TV ACCs role to edit an existing TV ACCs. Figure 3.2-32 shows the notional Edit TV ACC screen. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-32. Notional Screen: Edit TV ACC

Users will have the ability to add, edit, or delete TV ACC reviews and reviewer information by clicking on the Manage Reviews button from the Edit TV ACC screen.

Figure 3.2-33 shows the List of TV ACC reviews screen.

Figure 3.2-33. Notional Screen: List of TV ACC Reviews

Figure 3.2-34 shows the Edit TV ACC reviews notional screen if users choose to edit a TV ACC Review from the List TV ACC Reviews screen.

Figure 3.2-34. Notional Screen: Edit TV ACC Reviews

3.2.4.7   Delete TV ACC

When users delete a TV ACC, the Compliance Monitoring activity and all child records for that Compliance Monitoring activity will be deleted. The child records include:

- Links to Inspections/Evaluations
- Links to Investigations
- Links to Information Requests
- Links to TV ACCs
- Links to Stack Tests
- Links to Enforcement Actions
- Links to Alleged Violation Files

Batch

Batch users will have Delete TV ACCs transactions rejected if the record does not exist or the business rules are violated.

Figure 3.2-35 illustrates the processing required for deleting a TV ACC from ICIS-Air through a batch transaction.

Figure 3.2-35. Use Case: Delete TV ACC—Batch
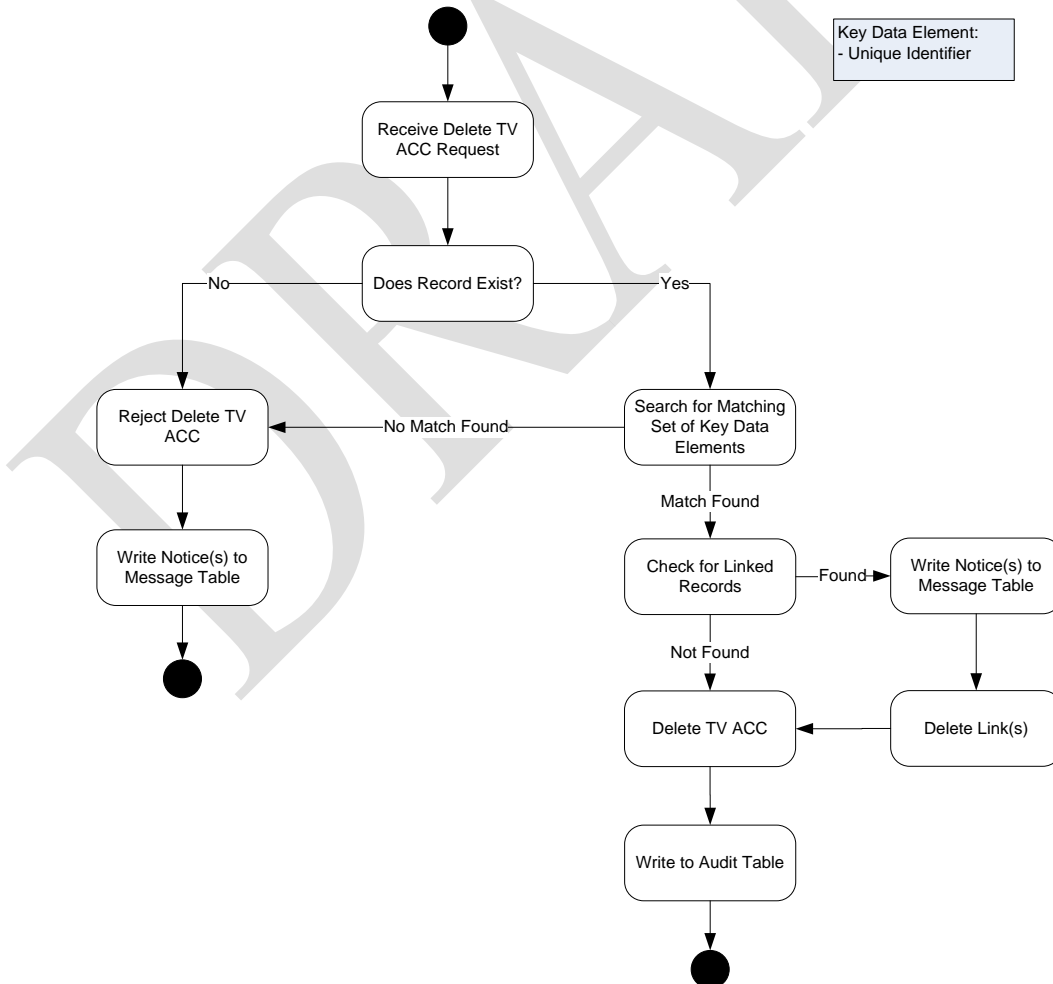
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Users can delete a TV ACC record by searching for the TV ACC record on the Search Compliance Monitoring Activities screen and then selecting the Delete link next to the TV ACC record on the List Compliance Monitoring Activities screen.

Figure 3.2-36 illustrates the processing required for deleting a TV ACC from ICIS-Air online.

Figure 3.2-36. Use Case: Delete TV ACC—Web
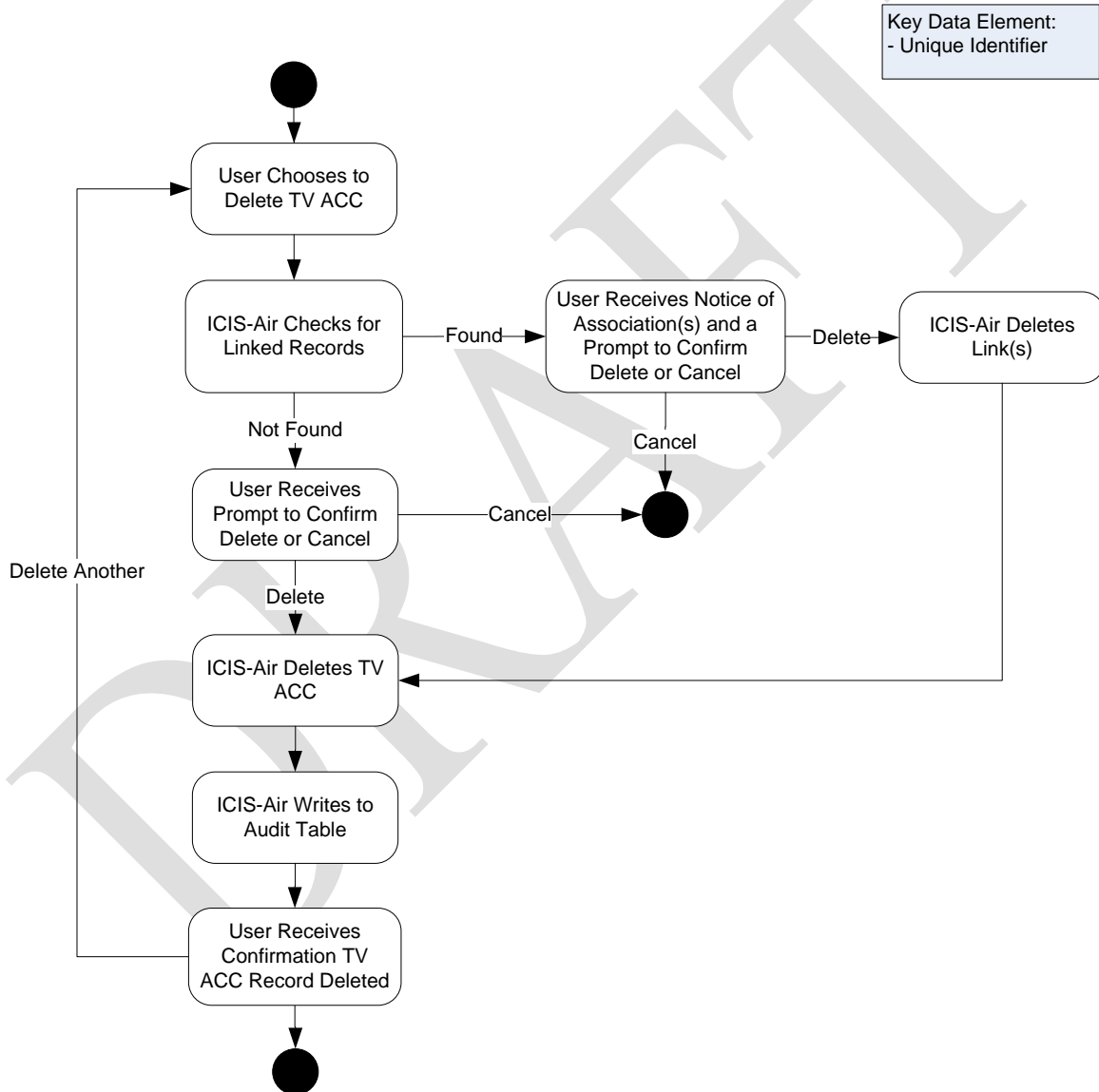
3.2.5   Continuous Emissions Monitoring and Excess Emissions Reports

CEM is the continuous measurement of pollutants emitted into the atmosphere in exhaust gases from combustion or industrial processes to ensure that the required reductions of sulfur dioxide (SO_2) and mono-nitrogen oxides (NO_x) under the Acid Rain Program are met, as well as

ensuring that emissions exceedences for carbon dioxide (CO_2) and non-criteria pollutants under NSPS, NESHAP, or other Air programs, are identified promptly so corrective measures can be taken at a Facility. The CEM regulations also contain requirements for equipment performance specifications, certification procedures, and reporting.

EPA requires that excess emissions be reported when a regulated air pollutant is released into the environment at a rate that is above the permitted levels for that Facility as outlined in the CEM. When an exceedance of emissions occurred for a pollutant, Facilities are required to submit EERs per report period, usually on a quarterly basis. If no emission exceedances occurred for a Continuous Emissions Monitor or Continuous Emissions Monitoring System, the Facility would submit an EER summary report for that reporting period.

ICIS-Air will receive CEM and EER data directly from the EPA electronic reporting repository:

- CEM and EER data will be read-only; therefore users will not be able to add, edit, or delete any data via the web or batch.
- ICIS-Air will not calculate any data (e.g., Total percentage of excess emission); alternatively ICIS-Air will receive all data, including calculated data, from the repository.
- Users will have the ability to link EERs to PCEs, Enforcement Actions, and Alleged Violation Files.
- ICIS-Air will link the CEM and EER record to the electronic report that resides in the electronic reporting repository.

Refer to the External Interface Systems Module for EPA's electronic reporting repository for additional information on the interface process and requirements regarding CEM and EER data.

This module section provides requirements for how the users will access the CEM and EER data in ICIS-Air once the data have been imported from the electronic reporting repository. It also includes notional screens as examples of how users would view the CEM and EER data, as well as the ability for users to search on the data and link the data to other Compliance Monitoring Activities, Enforcement Actions, and Alleged Violation Files.

The requirements, functionality, data elements, and business rules that support the processing of CEM and EER are detailed in the following subsections.

Note that regulations pertaining to CEM and EER electronic reporting have not yet been solidified, thus the requirements and data elements listed will need to be revisited when the regulations are finalized.

3.2.5.1   Summary of CEM and EER Modernization in ICIS-Air

Some Continuous Emissions Monitoring and Excess Emissions Report functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Electronic data from the electronic reporting repository**
  Legacy AFS does not import electronic CEM and EER data from an external system. Electronic CEM and EER data will be submitted by the Regulated Community via the Central Data Exchange (CDX), and data will be loaded into the electronic reporting repository in WebFIRE through the Electronic Reporting Tool (ERT). ICIS-Air will

import electronic CEM and EER data and link the EER records to the electronic reports stored in the electronic reporting repository.

- **Read-Only CEM/EER Data**

  All CEM/EER data in ICIS-Air will be read-only since they will be imported from EPA's electronic reporting repository. Therefore, users will not be able to add, edit, or delete any imported data via the web or batch.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of CEM and EERs in ICIS-Air.

3.2.5.2   CEM and EER Functional Requirements

Table 3.2-13 lists the requirements that apply to CEM and EER. It includes functions that are allowed and business rules within a function.

Table 3.2-13. ICIS-Air CEM and EER Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
Continuous Emissions Monitoring				
1.	5.5.2, 5.12.1	EPA SRS	The system shall allow the user to access the CEM screen from the homepage and from the Facility screen.	ICIS-Air version 1.0
2.	5.12.1	EPA SRS	The system shall display the following data elements on the CEM screen: • Facility ID • Facility Name • Emissions Point ID • Manufacturer • Model Number • Serial Number • Applicable Air Programs • Monitoring Requirements • Permit ID • Enforcement Agency • Installation Date • Certification Date • Pollutant • Permissible Emission Limit • Permissible Emission Limit Unit • Diluent • Process Unit Description • Compliance/Emission Point • Channel Number • Source Classification Code	ICIS-Air version 1.0
3.	5.12.1	EPA SRS	The system shall enforce the security model for the users to view, add, edit, and delete a CEM record. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
4.	5.12.1	EPA SRS	The system shall receive all CEM data, including calculated data, from the EPA reporting repository.	ICIS-Air version 1.0
Excess Emissions Reports				
5.	5.5.4, 5.12.2	EPA SRS	The system shall allow the user to access the EER	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			screen from the CEM Screen.	

6.	5.12.2	EPA SRS	The system shall display the following data elements on the EER screen:
			• Facility ID
			• Emissions Point ID
			• Reporting Period Start Date
			• Reporting Period End Date
			• Pollutant
			• Total Source Operating Time
			• Changes in Process or Controls Since Last Report
			• Was there an Occurrence of Excess Emission to Justify an Excess Emissions Report?
			• Link to Report
			• Basis of Estimate
			• Contacts and Addresses
			  – Affiliation
			  – First Name
			  – Last Name
			  – Address
			  – Phone
			  – Fax
			  – E-mail
			  – Office
			  – Organization
			• Startup and Shutdown
			• Startup and Shutdown Unit
			• Control Equipment Problems
			• Control Equipment Problems Unit
			• Cleaning
			• Cleaning Unit
			• Process Problems
			• Process Problems Unit
			• Fuel Problems
			• Fuel Problems Unit
			• Monitoring Malfunction
			• Monitoring Malfunction Unit
			• Control Malfunction
			• Control Malfunction Unit
			• Other Known Causes
			• Other Known Causes Unit
			• Unknown Causes
			• Unknown Causes Unit
			• Total Duration of Excess Emission
			• Total Duration of Excess Emission (%)
			• Monitor Equipment Malfunctions
			• Monitor Equipment Malfunctions Unit
			• Non-Monitor Equipment Malfunctions
			• Non-Monitor Equipment Malfunctions Unit
			• Quality Assurance Calibration
			• Quality Assurance Calibration Unit
				ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Repair • Repair Unit • Preventative Maintenance • Preventative Maintenance Unit • Data Backup • Data Backup Unit • Recertification • Recertification Unit • Other Known Causes • Other Known Causes Unit • Unknown Causes • Unknown Causes Unit • Total Number of Readings Missed • Total Percentage of Readings Missed • Total CEMS Downtime • Total CEMS Downtime (%) • Event Occurrence Number • Date and Time Event Begins • Date and Time Event Ends • Reason for Excess Emission • Duration of Excess Emission Event • Duration of Excess Emission Event Unit • Total Time • Notes	
7.	5.12.2	EPA SRS	The system shall enforce the security model for the users to view, add, edit, and delete an EER record. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
8.	5.12.1	EPA SRS	The system shall receive all EER data, including calculated data, from the EPA reporting repository.	ICIS-Air version 1.0
9.	5.12.4	EPA SRS	The system shall notify the system administrator if errors have occurred during the CEM/EER data imports.	ICIS-Air version 1.0
10.	5.12.1, 5.12.2	EPA SRS	The system shall provide the user a list of search results that matches the search criteria for the CEMs and EERs.	ICIS-Air version 1.0
11.	N/A	N/A	The system shall allow the user to link EERs to Partial Compliance Evaluations.	ICIS-Air version 1.0
12.	N/A	N/A	The system shall allow the user to unlink EERs from Partial Compliance Evaluations.	ICIS-Air version 1.0
13.	N/A	N/A	The system shall allow the user to link EERs to Enforcement Actions.	ICIS-Air version 1.0
14.	N/A	N/A	The system shall allow the user to unlink EERs from Enforcement Actions.	ICIS-Air version 1.0
15.	N/A	N/A	The system shall allow the user to link EERs to Alleged Violation Files.	ICIS-Air version 1.0
16.	N/A	N/A	The system shall allow the user to unlink EERs from Alleged Violation Files.	ICIS-Air version 1.0

3.2.5.3 CEM and EER Data Requirements

Table 3.2-14 lists the data element requirements that apply to CEM and EER. This table includes the system, minimum data requirements, and possible future data elements. Note: System Required fields in this section indicate that the fields are System Required in the Electronic Reporting Tool (ERT).

Table 3.2-14. ICIS-Air CEM and EER Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
Continuous Emissions Monitoring						
1.	Y	N	Y	Y	N/A	Unique Identifier • System generated unique identifier • Alphanumeric (15)
2.	N	Y	Y	N	5.12.1	Facility ID • Foreign Key of Linked Facility
3.	N	Y	Y	N	5.12.1	Emissions Point ID • Numbers with 5 decimal places • Negative or Positive Numbers
4.	N	Y	Y	N	5.12.1	Manufacturer • Alphanumeric (50)
5.	N	Y	Y	N	5.12.1	Model Number • Alphanumeric (15)
6.	N	N	N	N	5.12.1	Serial Number • Alphanumeric (15)
7.	N	N	N	N	5.12.1	Applicable Air Programs • Multiselect • Must be validated against REF_PROGRAM table
8.	N	N	N	N	5.12.1	Monitoring Requirements • Valid Values: – TBD
9.	N	N	N	N	5.12.1	Permit ID • Alphanumeric (15)

10.	N	N	N	N	5.12.1	Enforcement Agency
						• Valid Values:
						  – U.S. EPA
						  – Region
						  – State
						  – Local

11.	N	N	N	N	5.12.1	Installation Date • Date
12.	N	Y	Y	N	5.12.1	Certification Date • Date
13.	N	N	N	N	5.12.1	Diluent • Alphanumeric (100)
14.	N	Y	Y	N	5.12.1	Process Unit Description • Alphanumeric (100)

15.	N	N	N	N	5.12.1	Compliance/Emission Point
						• Valid Values:
						  – Compliance (C)
						  – Merged (M)

ID	Key?	SR	PR	SG	Client Req ID	Requirement
16.	N	N	N	N	5.12.1	Channel Number • Alphanumeric (3)
17.	N	N	N	N	5.12.1	Source Classification Code • Alphanumeric (50)
18.	N	Y	Y	N	5.12.1	Pollutant • Must be validated against REF_POLLUTANT table for Air Pollutants
19.	N	Y	Y	N	5.12.1	Permissible Emission Limit • Number

20.	N	Y	Y	N	5.12.1	Permissible Emission Limit Unit
						• Valid Values:
						  – COH
						  – gm/m2
						  – opacity
						  – ppm
						  – ppb
						  – odor index
						  – soiling index
						  – µg/m3

Excess Emissions Report						
21.	Y	Y	Y	N	5.12.2	Emissions Point ID • Foreign Key of Linked CEM
22.	Y	Y	Y	N	5.12.2	Reporting Period Start Date • Date
23.	Y	Y	Y	N	5.12.2	Reporting Period End Date • Date
24.	Y	Y	Y	N	5.12.2	Pollutant • Foreign Key of Linked CEM
25.	N	Y	Y	N	5.12.2	Total Source Operating Time • Number in Hours • Number in Minutes for Opacity only

26.	N	N	N	N	5.12.2	Was there an Occurrence of Excess Emission to Justify an Excess Emissions Report?
						• Valid Values:
						  – Yes
						  – No

27.	N	Y	Y	N	5.12.2	Changes in Process or Controls Since Last Report • Alphanumeric (500) • Free-form text
28.	N	N	N	N	5.12.2	Link to Document • URL to Document in electronic reporting repository

29.	N	N	N	N	5.12.2	Basis of Estimate
						• Valid Values
						  – Compliance Test
						  – CEMS
						  – Engineering Calculation
						  – Operating Logs
						  – Other

ID	Key?	SR	PR	SG	Client Req ID	Requirement
30.	N	N	N	N	5.12.2	Contacts Role • Valid Values: – Responsible Official
31.	N	N	N	N	5.12.2	Contacts First Name • Alphanumeric (30) • Free-form text
32.	N	N	N	N	5.12.2	Contacts Last Name • Alphanumeric (30) • Free-form text
33.	N	N	N	N	5.12.2	Contacts Middle Name • Alphanumeric (30) • Free-form text
34.	N	N	N	N	5.12.2	Contacts Phone • Numeric (14) • Free-form text
35.	N	N	N	N	5.12.2	Contacts Fax • Numeric (14) • Free-form text
36.	N	N	N	N	5.12.2	Contacts E-mail • Alphanumeric (30) • Free-form text
37.	N	N	N	N	5.12.2	Contacts Office • Alphanumeric (50)
38.	N	N	N	N	5.12.2	Contacts Organization • Alphanumeric (50)

39.	N	N	N	N	5.12.2	Event Type
						• Valid Values for Excess Emssions
						   – 1. Start-up and Shutdown
						   – 2. Control Equipment Problems
						   – 3. Cleaning
						   – 4. Process Problems
						   – 5. Fuel Problems
						   – 6. Monitoring Malfunction
						   – 7. Control Malfunction
						   – 8. Other Known Causes
						   – 9. Unknown Causes
						
						• Valid Values for CEM Downtime
						   – 1. Monitoring Equipment Malfunctions
						   – 2. Non-Monitor Equipment Malfunctions
						   – 3. Quality Assurance Calibration
						   – 4. Repair
						   – 5. Preventative Maintenance
						   – 6. Data Backup
						   – 7. Recertification
						   – 8. Other Known Causes
						   – 9. Unknown Causes
						   – 10. Total Number of Readings Missed
						   – 11. Total Percentage of Readings Missed

ID	Key?	SR	PR	SG	Client Req ID	Requirement

40.	N	N	N	N	5.12.2	Event Sub-Type
						• Valid Values
						    – Excess Emissions
						    – CEM Downtime

41.	N	N	N	N	5.12.2	Event Order Number • Number
42.	N	Y	Y	N	5.12.2	Total Duration of Excess Emission • Number
43.	N	Y	Y	N	5.12.2	Total Duration of Excess Emission (%) • Number
44.	N	Y	Y	N	5.12.2	Total CEMS Downtime • Number
45.	N	Y	Y	N	5.12.2	Total CEMS Downtime (%) • Number
46.	N	N	N	N	5.12.2	Event Occurrence Number • Number
47.	N	N	N	N	5.12.2	Date Event Begins • Date
48.	N	N	N	N	5.12.2	Time Event Begins • Time
49.	N	N	N	N	5.12.2	Date Event Ends • Date
50.	N	N	N	N	5.12.2	Time Event Ends • Time
51.	N	Y	Y	N	5.12.2	Reason for Excess Emission • Number • Valid Values – TBD
52.	N	N	N	N		Corrective Action Taken, Nature of Repairs or Adjustments to CEMS • Alphanumeric (100) • Free-form text
53.	N	N	N	N	5.12.2	Duration of Excess Emission Event • Number

54.	N	N	N	N	5.12.2	Duration of Excess Emission Event Unit
						• Valid Values
						    – Hours
						    – Minutes
						    – Percentage

55.	N	N	N	N	5.12.2	Notes • Alphanumeric (200) • Free-form text
56.	N	N	N	Y		Created By • System Generated based upon User ID
57.	N	N	N	Y		Created Date • System Generated • Date
58.	N	N	N	Y		Last Modified By • System Generated based upon User ID

ID	Key?	SR	PR	SG	Client Req ID	Requirement
59.	N	N	N	Y		Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.2.5.4   *CEM and EER Business Rule Requirements*

Table 3.2-15 lists the business requirements that apply to CEM and EER. This table includes the business rules for data elements and error handling.

Table 3.2-15. ICIS-Air CEM and EER Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.12.1, 5.12.2	The system shall ensure that the CEM is associated to an existing Facility.	ICIS-Air version 1.0
2.	5.12.1	The system shall ensure that zero to many CEM records can be associated to a Facility.	ICIS-Air version 1.0
3.	5.12.1	The system shall ensure that only one CEM record can be associated to the combination of Facility ID, Emission Point ID, and Pollutant.	ICIS-Air version 1.0
4.	5.12.1	The system shall ensure that the CEM is associated to an existing Pollutant.	ICIS-Air version 1.0
5.	5.12.1	The system shall ensure that the CEM can be associated to only one Pollutant.	ICIS-Air version 1.0
6.	5.12.1, 5.12.2	The system shall ensure that zero to many EERs can be associated to a CEM.	ICIS-Air version 1.0
7.	5.12.2	The system shall ensure that only one EER is associated to one Reporting Period Start Date and Reporting Period End Date for a CEM.	ICIS-Air version 1.0
8.	5.12.2	The system shall allow one or many individual event occurrences can be associated to an Excess Emissions or CEMS downtime event for a particular EER.	ICIS-Air version 1.0
9.	N/A	The system shall ensure that a Partial Compliance Evaluation eligible to be related must already exist in the system.	ICIS-Air version 1.0
10.	N/A	The system shall ensure that an Enforcement Action eligible to be related must already exist in the system.	ICIS-Air version 1.0
11.	N/A	The system shall ensure that an Alleged Violation Files eligible to be related must already exist in the system.	ICIS-Air version 1.0
12.	N/A	The system shall update the audit table with the system name of where the CEM and EER data came from and the date of when the data was imported into ICIS-Air for all new CEM and EER data.	ICIS-Air version 1.0
13.	N/A	The shall update the audit table with the system name of where the CEM and EER data came from and the date of when the data was updated in ICIS-Air for all existing CEM and EER data.	ICIS-Air version 1.0

3.2.5.5   *View CEM Data*

Users will be able to view CEM data that have been imported from the electronic reporting repository. All imported data will be read-only so users will not be able to add, edit or delete CEM data in ICIS-Air. A user will also have the ability to view the associated EERs for that CEM record.

The following data elements are key data elements that uniquely identify a CEM record:

- Unique Identifier

Figure 3.2-37 shows the notional user interface for viewing a CEM record.

Figure 3.2-37. Notional Screen: View CEM Data

3.2.5.6   View EER Data

Users will be able to view EERs that are associated with the CEM record that have been imported from the electronic reporting repository. All imported data will be read-only, so users will not be able to add, edit or delete EER data in ICIS-Air. Excess Emissions Reports are submitted per reporting period thus multiple EERs may exist for a single CEM parent record. The following data elements are key data elements that uniquely identify an EER record:

- CEM ID
- Emissions Point ID
- Reporting Period Start Date
- Reporting Period End Date.

Figure 3.2-38 shows the user interface for viewing an Excess Emissions Report record. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.2-38. Notional Screen: View EER Data

Total CEMS Downtime		
Events	**Result**	
*Monitor Equpiment Malfunctions.	8.1	Hours
*Non-Monitor Equpiment Malfunctions.	1.9	Hours
*Quality Assurance Calibration.	5.2	Hours
Repair.	3.7	Hours
Preventative Maintenance.	8.0	Hours
Data Backup.	2.1	Hours
Recertification.	0	Hours
*Other Known Causes.	6.2	Hours
*UnKnown Causes.	0	Hours
Total Number of Readings Missed.	7	
Total Percentage of Readings Missed.	5	%
*Total CEMS Downtime	35.2	Hours
*Total CEMS Downtime (%)	4.4	%

Created By: WebFIRE Created Date: 06/02/2014
Last Modified By: WebFIRE Last Modified Date: N/A

Figure 3.2-39 shows the user interface for viewing detailed information on individual events reported on the EER. To view the individual events screen, users would click on the individual event's link displayed on the EER screen.

Figure 3.2-39. Notional Screen: View EER Individual Events

3.3 ENFORCEMENT ACTIONS OVERVIEW

Enforcement Actions are used by Agencies to help return facilities to compliance if an alleged violation or other issue has been discovered.

3.3.1 General Enforcement Actions

There are two major types of Enforcement Actions: Informal and Formal. These types share modernization items and some common areas of functionality. This section will discuss the items common to both types. Following this section, detailed requirements will be provided for Informal and Formal (both Delegated Agency and EPA) Enforcement Actions.

3.3.1.1 Summary of Enforcement Action Modernization in ICIS-Air

Some Enforcement Action functionality will be changed to better align the system with the Air Program and users' business needs. A summary of such changes follows.

- **EA structure is significantly different in AFS and ICIS-Air**
  - Attempting to more closely model the system structure to the business
  - Different structures/data elements collected for formal and informal EAs
  - What was multiple actions in AFS may be captured by a single EA with attributes in ICIS
    - AFS might have an addressing action of State Court Consent Decree and a resolving action of Violation Resolved
    - ICIS-Air would have a State Court Consent Decree with an Issued date and then entry of an Air Resolved Date to indicate closure and compliance with all EA conditions
  - EAs can have multiple final orders to capture when an order is amended or for situations such as both an Administrative Compliance Order and an Administrative Penalty Order have been issued
  - Penalties and SEPs are attributes of a Final Order
  - EAs can have multiple Facilities associated with them
- **AFS allowed the user to enter a penalty on any action, and it was assumed what stage in the penalty lifecycle that penalty reflected (e.g., Final/Assessed)**
  - ICIS-Air will provide the ability to enter penalties at all lifecycle stages (i.e., Proposed/Sought, Final/Assessed, Collected)
  - Final/Assessed will remain the MDR penalty
- **Pollutants and Programs not limited to those on the Facility record**
  - Visual indicators will be used to help differentiate when adding and viewing on screen

3.3.1.2 General Enforcement Action Functional Requirements

Table 3.3-1 lists the requirements that apply to Enforcement Actions.

Table 3.3-1. ICIS-Air Enforcement Action Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.1.5, 5.10.1, 5.10.3	EPA SRS	The system shall allow the user to search for Enforcement Actions in an Air-only search based on: Facility Information • Facility Name • Facility ID • FRS ID • Registration Number • Region • State • LCON • Facility Type of Ownership • Address • City • County • Zip Code • Tribal Land Code • NAICS Codes • SIC Codes Enforcement Action Information • Enforcement Action Identifier • Enforcement Action Name • Enforcement Action Type • Agency • Court Docket Number • Court Docket Name • Air Programs • Pollutants • Milestone Date Type • Milestone Date Range • Final Order Type • Final Order Date Type • Final Order Date Range • OECA Core Program • National Initiatives • Regional Initiatives • State Priority User Defined Fields • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6	ICIS-Air version 1.0
2.	N/A	SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall provide the user a list of search results that matches the search criteria for the Enforcement Actions.	ICIS-Air version 1.0
3.	5.11.1	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to link Enforcement Actions to Compliance Monitoring Activities.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
4.	5.9.11	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to unlink Enforcement Actions from Compliance Monitoring Activities.	ICIS-Air version 1.0
5.	5.11.1	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to link Enforcement Actions to Alleged Violation Files.	ICIS-Air version 1.0
6.	N/A	SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to Informal Enforcement Actions from Alleged Violation Files.	ICIS-Air version 1.0

3.3.1.3   Search Air Enforcement Actions—Web Only

Users will be able to search for and view a list of Enforcement Actions using dedicated Air search and list screens if they enter the system through the ICIS-Air homepage. EPA users will have a choice of searching for and listing Enforcement Actions via the ICIS-FE& and ICIS-NPDES homepages, which will use the standard ICIS Enforcement Action search and search results or through the Air-only ICIS-Air homepage. ICIS-Air will display the List Enforcement Actions screen populated with a list of Enforcement Actions based on the search criteria.

From the Air Enforcement Actions List screen, users can perform the following operations:

- Add Formal and Informal Enforcement Actions
- Edit Formal and Informal Enforcement Actions
- Copy Formal Enforcement Actions
- Delete Formal and Informal Enforcement Actions.

Figure 3.3-1 shows the notional Air Enforcement Actions search screen.

Figure 3.3-1. Notional Screen: Search Air Enforcement Actions

Figure 3.3-2 shows the notional List Air Enforcement Actions screen of search results.

Figure 3.3-2. Notional Screen: List Air Enforcement Actions

3.3.1.4   Linking and Unlinking Activities

Users will have the ability to link and unlink the current Enforcement Action record to related Compliance Monitoring, Alleged Violation File, and other Enforcement Action activities. Once users have linked the Enforcement Action to other activities, they can view a list of related activities that have already been linked. The Related Activities screen will be blank for new Enforcement Actions records. Figure 3.3-3 shows the related activities that have been linked to the current Enforcement Action.

Figure 3.3-3. Notional Screen: Related Activities

Users can click on the List More Eligible to Link button from the Linked Activities screen to list additional activities. Figure 3.3-4 shows the notional list of activities eligible to be linked to the Enforcement Action.

Figure 3.3-4. Notional Screen: List of Activities Eligible to be Linked

3.3.2   Informal Enforcement Actions

An Informal Administrative Action is generally any communication from EPA or Delegated Agency that notifies the regulated entity of a problem.

The requirements, functionality, data elements, and business rules that support the processing of Informal Enforcement Actions are detailed in the following subsections.

3.3.2.1   *Summary of Informal Enforcement Actions in ICIS-Air*

Some Informal Enforcement Actions functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. See Section 3.3.1.1 for the summary of Enforcement Action modernization in ICIS-Air.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Informal Enforcement Actions in ICIS-Air.

3.3.2.2   *Informal Enforcement Action Functional Requirements*

Table 3.3-2 lists the requirements that apply to Informal Enforcement Actions. It includes functions that are allowed and business rules within a function.

Table 3.3-2. ICIS-Air Informal Enforcement Action Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.4, 5.10.1, 5.10.4	EPA SRS	The system shall allow the user to view Informal Enforcement Actions data.	ICIS-Air version 1.0
2.	5.10.1, 5.10.4	EPA SRS	The system shall allow the user to add a new Informal Enforcement Action record.	ICIS-Air version 1.0
3.	5.10.1, 5.10.4	EPA SRS	The system shall allow the user to edit existing Informal Enforcement Action data.	ICIS-Air version 1.0
4.	5.10.1, 5.10.4	EPA SRS	The system shall allow the user to delete an existing Informal Enforcement Action record.	ICIS-Air version 1.0
5.	5.10.1, 5.10.4	EPA SRS	The system shall allow the user to access the Add Informal Enforcement Action screen from the homepage.	ICIS-Air version 1.0
6.	5.10.1, 5.10.4	EPA SRS	The system shall allow the user to access the Add Informal Enforcement Action screen from within a facility.	ICIS-Air version 1.0
7.	5.4.1, 5.10.1, 5.10.5, 5.10.4, 5.15.1, 5.15.2, 5.17.5	EPS SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall display the following data elements on the Informal Enforcement Actions screen for Delegated Agency Users: • Facility ID • Facility Name • Unique Identifier • Enforcement Action Name • Enforcement Action Type • Achieved Date • Issued By • Agency Lead Indicator • Enforcement Agency Type • Enforcement Agency Name • Federal Statutes Violated • Program(s) violated	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Subparts violated • Contacts – Affiliation – First Name – Last Name – Address – Phone – Fax – Email – Office – Organization • Federal Facility Activity • Federal Facility Comment • Comments • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6	
8.	5.4.1, 5.4.4, 5.10.1, 5.10.4, 5.32.1	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall display the following data elements on the Informal Enforcement Actions screen for EPA Users: • Facility ID • Facility Name • Unique Identifier • Enforcement Action Name • Enforcement Action Type • Achieved Date • Issued By • Agency Lead Indicator • Enforcement Agency Type • Enforcement Agency Name • Federal Statutes Violated • Law Sections Violated • Program(s) violated • Subparts violated • Other Water Programs/Environmental Statue Violations Alleged • Citations (Edit screen only) – Title – Part – Section • Contacts – Affiliation – First Name – Last Name – Address – Phone – Fax – Email – Office – Organization • Federal Facility Activity • Federal Facility Comment • Comments (Can be multiple) • User Defined Field 1 • User Defined Field 2 • User Defined Field 3	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• User Defined Field 4 • User Defined Field 5 • User Defined Field 6	
9.	N/A		The system shall enforce the security model for the users to view, add, edit, and delete an Informal Enforcement Action. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
10.	N/A	SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to select a private Informal Enforcement Action type that will be Enforcement Sensitive.	ICIS-Air version 1.0
17.	5.9.11	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to link Informal Enforcement Actions to other Enforcement Actions.	ICIS-Air version 1.0
18.	5.9.11	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to unlink Informal Enforcement Actions from other Enforcement Actions.	ICIS-Air version 1.0
19.	N/A	SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall allow the user to enter multiple comments for an Informal Enforcement Action record.	ICIS-Air version 1.0

3.3.2.3 Informal Enforcement Action Data Requirements

Table 3.3-3 lists the data element requirements that apply to Informal Enforcement Actions. This table includes the system, minimum data requirements, and possible future data elements. Note: References to REF tables are place holders and values for the REF tables will be reviewed during the Design phase.

Table 3.3-3. ICIS-Air Informal Enforcement Action Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement
1.	Y	Y	Y	N	N/A	Both	Facility ID • Foreign Key of Linked Facility
2.	Y	Y	Y	N	N/A	Both	Unique Identifier • User Defined or System Generated • Alphanumeric (15)
3.	N	F	F	N	N/A	Both	Enforcement Action Name • Alphanumeric (100) • Free-form text
4.	N	Y	Y	N	N/A	Both	Enforcement Action Type • Must be validated against REF table

5.	N	N	N	N	N/A	Both	Achieved Date
							• Date
							    – Batch: Must be valid date in yyyy-mm-dd format
							    – Web: Must be valid date in mm/dd/yyyy format

6.	N	Y	Y	N	N/A	Both	Issued By
							• Valid Values:
							    – EPA
							    – State
							    – Tribe
							    – LCON

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement

7.	N	N	N	N	N/A	Both	Agency Lead Indicator
							• Valid Values:
							  – U.S. EPA
							  – State
							  – Tribe
							  – Local Government
							  – State Contractor
							  – EPA Contractor
							  – EPA Grantee (not State)

8.	N	N	N	N	N/A	Both	Enforcement Agency Type • Multiselect • Must be validated against REF table
9.	N	N	N	N	N/A	Both	Enforcement Agency Name • Alphanumeric (100) • Free-form text
10.	N	Y	Y	C	N/A	Both	Federal Statutes Violated: • Pick list • Must be validated against REF table • Can be multiple for Federal users entering Federal records • System Generated to CAA (for Delegated Agency users, or Federal users entering Delegated Agency records)
11.	N	F	F	N	N/A	Federal	Law Sections Violated: • Multiselect • Dynamically populated based on Federal Statutes selected • Must be validated against REF_LAW_SECTION table
12.	N	Y	Y	N	N/A	Both	Program(s) Violated • Multiselect • Dynamically populated based on Federal Law Sections (Federal) • Defaults to Clean Air Act programs (for Delegated Agency users, or Federal users entering Delegated Agency records) • Must be validated against REF_PROGRAM table
13.	N	N	N	N	N/A	Both	Subparts Violated • Multiselect • Dynamically populated based on Federal Law Sections (Federal) • Dynamically populated based on Program(s) Violated (for Delegated Agency users, or Federal users entering Delegated Agency records) • Must be validated against REF table
14.	N	N	N	N	N/A	Federal	Other Water Programs/Environmental Statue Violations Alleged • Alphanumeric (100) • Free-form text
15.	N	N	N	N	N/A	Both	Applicable Air Pollutants • Multiselect • Must be validated against REF_POLLUTANT table

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement
16.	N	N	N	N	N/A	Federal	Citation Title • Can be multiple • Alphanumeric (100) • Free-form text
17.	N	N	N	N	N/A	Federal	Citation Part • Can be multiple • Alphanumeric (100) • Free-form text
18.	N	N	N	N	N/A	Federal	Citation Section • Can be multiple • Alphanumeric (100) • Free-form text
19.	N	N	N	N	N/A	Both	Contact Person ID • Multiple for an Informal Enforcement Action record • Must be validated against Contacts table
20.	N	N	N	N	N/A	Both	Federal Facility Activity • Multiselect • Must be validated against REF table
21.	N	N	N	N	N/A	Both	Federal Facility Activity Comments • Alphanumeric (500) • Free-form text
22.	N	N	N	N	N/A	Both	Comments • Multiple for an Informal Enforcement Action record • Alphanumeric (500) • Free-form text
23.	N	N	N	Y	N/A	Both	Comment Entered On • Date • System generated
24.	N	N	N	Y	N/A	Both	Comment Entered By • Alphanumeric (50) • System generated

25.	N	N	N	N	N/A	Both	Sensitive Comment
							• Alphanumeric (1)
							• Valid Values:
							  – N
							  – Y (Default)

26.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Both	User Defined Field Enforcement Sensitive Flag
							• Alphanumeric (1)
							• Valid Values:
							  – Yes (default)
							  – No

27.	N	N	N	N	N/A	Both	User Defined Field 1
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

28.	N	N	N	N	N/A	Both	User Defined Field 2 • Alphanumeric (100) • Free-form text
29.	N	N	N	N	N/A	Both	User Defined Field 3 • Alphanumeric (100) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement

30.	N	N	N	N	N/A	Both	User Defined Field 4
							• Date
							  – Batch: Must be valid date in yyyy-mm-dd format
							  – Web: Must be valid date in mm/dd/yyyy format

31.	N	N	N	N	N/A	Both	User Defined Field 5
							• Date
							  – Batch: Must be valid date in yyyy-mm-dd format
							  – Web: Must be valid date in mm/dd/yyyy format

32.	N	N	N	N	N/A	Both	User Defined Field 6 • Alphanumeric (500) • Free-form text
33.	N	N	N	Y			Created By • System Generated based upon User ID
34.	N	N	N	Y			Created Date • System Generated • Date
35.	N	N	N	Y			Last Modified By • System Generated based upon User ID
36.	N	N	N	Y			Last Modified Date • System Generated • Date

SR = System Required (Yes/Federal/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.3.2.4 Informal Enforcement Action Business Rule Requirements

Table 3.3-4 lists the business rules requirements that apply to Informal Enforcement Actions. This table includes the business rules for data elements and error handling.

Table 3.3-4. ICIS-Air Informal Enforcement Actions Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The system shall ensure that the Informal Enforcement Action is associated to an existing Facility ID.	ICIS-Air version 1.0
2.	N/A	The system shall ensure that an Informal Enforcement Action is associated to one or many Facilities.	ICIS-Air version 1.0
3.	N/A	The system shall ensure that an Enforcement Action eligible to be related must already exist in the system.	ICIS-Air version 1.0
4.	N/A	The system shall ensure that a Compliance Monitoring Activity eligible to be related must already exist in the system.	ICIS-Air version 1.0
5.	5.10.2	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Informal Enforcement Action data.	ICIS-Air version 1.0
6.	5.10.2	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all edited Informal Enforcement Action data.	ICIS-Air version 1.0
7.	N/A	The system shall default the Notification Action Type and Date on the Alleged Violation File with the Informal Enforcement Action Type and Achieved Date if the Informal Enforcement Action is being linked to an Alleged Violation File.	ICIS-Air version 1.0

3.3.2.5   Add Informal Enforcement Action

Users may enter an Informal Enforcement Action only against an existing Facility. Users must have the Add Informal Enforcement Actions privileges to add a new Informal Enforcement Action.

An Informal Enforcement Action is uniquely identified by the following key data elements:

- Unique Identifier

The following data elements are required to add a new Informal Enforcement Action in ICIS-Air:

- Facility ID
- Enforcement Action Name (EPA only)
- Enforcement Action Type
- Issued By
- Federal Statues Violated
- Law Sections Violated (EPA only)
- Programs Violated.

Batch

Batch users will have an Add Informal Enforcement Action transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.3.2.3, Informal Enforcement Action Data Elements, and Section 3.3.2.4, Informal Enforcement Action Business Rules, for more details.

Figure 3.3-5 illustrates the processing required for adding an Informal Enforcement Action to ICIS-Air through a batch transaction.

Figure 3.3-5. Use Case: Add Informal Enforcement Action—Batch
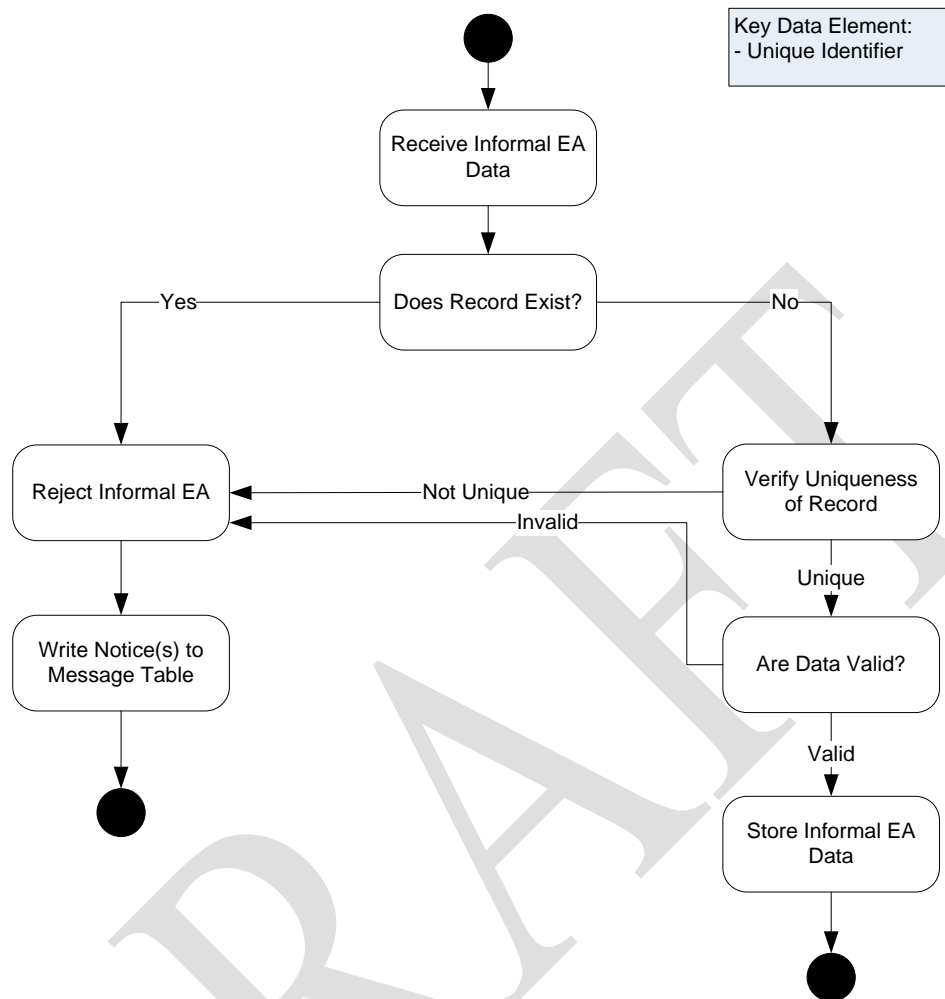
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.3.2.3, Informal Enforcement Actions Data Elements, and Section 3.3.2.4, Informal Enforcement Actions Business Rules, for more details.

Figure 3.3-6 illustrates the processing required for adding an Informal Enforcement Action in ICIS-Air online.

Figure 3.3-6. Use Case: Add Informal Enforcement Action—Web
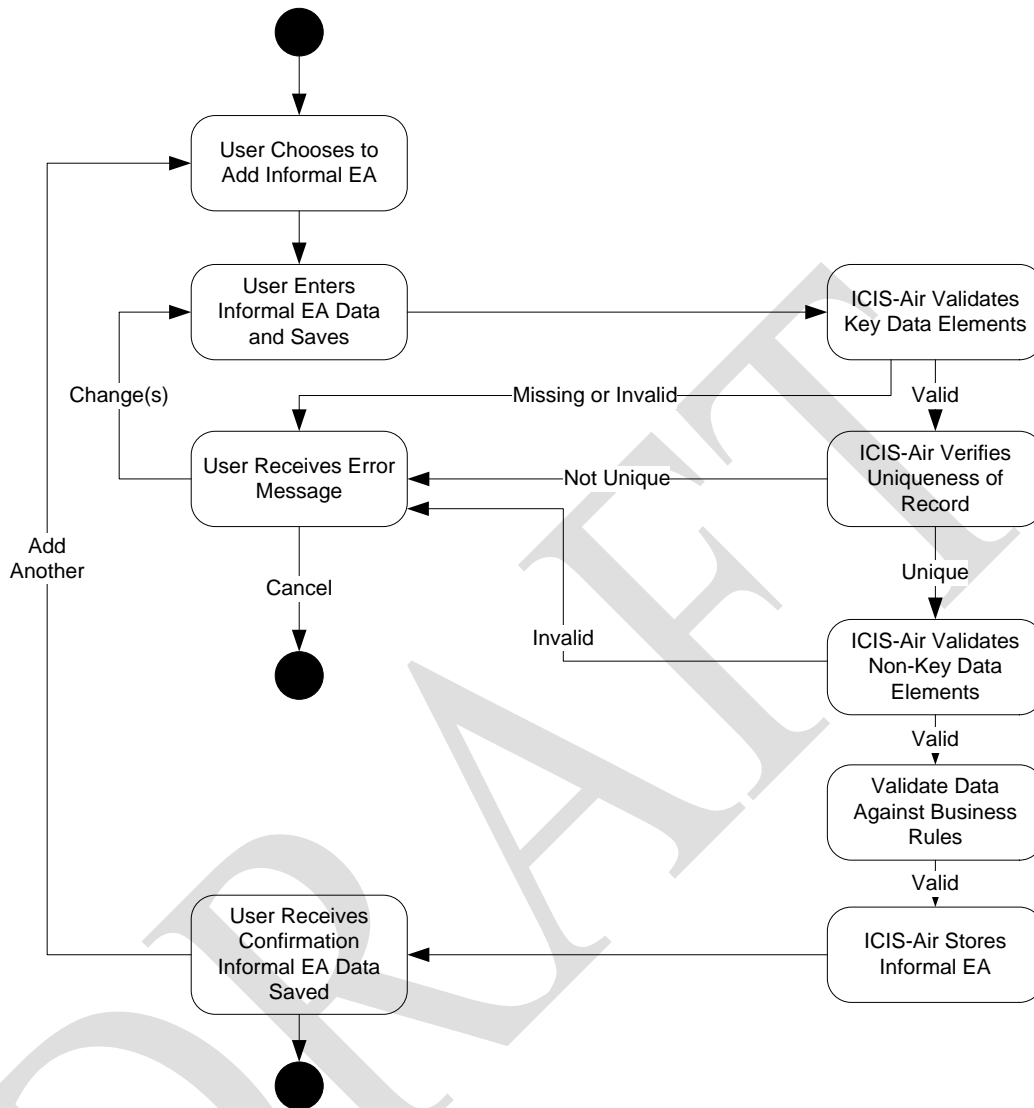
Figure 3.3-7 shows the notional Add Informal Enforcement Actions screen for Delegated Agencies. Figure 3.3-8 shows the notional Add Informal Enforcement Actions screen for EPA Users. Note: Each figure is one continuous screen but broken into multiple parts for legibility.

Figure 3.3-7. Notional Screen: Add Informal Enforcement Action (Delegated Agency)

Figure 3.3-8. Notional Screen: Add Informal Enforcement Action (EPA)

*Statute/Law Section/Program | Manage Statute/Law Section/Program

*Federal Statutes Violated:
CAA - Clean Air Act

Subparts Violated:

*Law Sections Violated:
CAA: 110: SIPS for Nat'l Primary and Secondary Ambient Air Quality Standards
CAA: 111: Standards for Performance for New Source Stationary Sources (NSP
CAA: 112D: MACT Standards

Other Water Programs/Environmental Statue Violations Alleged:

*Programs Violated:
Plus sign (+) indicates program is not on Facility record.

Violating Pollutants | Manage Pollutants

Pollutants:
Plus sign (+) indicates pollutant is not on Facility record.
Benzoperylene
Carbon Monoxide
Mercury
+PM2.5

Contacts | Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization

Cross Media Indicators

Federal Facility Activity:

Federal Facility Activity Comment:

User Defined Fields | **Sensitive:** ☑

1: ☐

2:

3:

4:

5:

6:

Comments | Manage Comments

Entered On	Entered By	Comments	Sensitive?

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

Save & Exit | Save & Continue | Save & Add Another | Save & Add Linked Activity | Select Type | Cancel

3.3.2.6   Edit Informal Enforcement Action

Users can edit An Informal Enforcement Action within the current view of the Informal Enforcement Actions record. A user will also have the ability to link the Informal Enforcement Actions to Compliance Monitoring activities and Enforcement Actions.

The following data elements are key data elements that uniquely identify an Informal Enforcement Action record and cannot be edited through the Edit Informal Enforcement Actions transaction:

- Unique Identifier

The following data elements are system generated or cannot be modified after the initial Informal Enforcement Actions record was created and cannot be edited through the Edit Informal Enforcement Actions transaction:

- Issued By

Batch

Batch users will have an Edit Informal Enforcement Actions transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.3.2.3 and business rules in Section 3.3.2.4 for more details on rejecting Informal Enforcement Actions edit transactions.

Figure 3.3-9 illustrates the processing required for editing an Informal Enforcement Action in ICIS-Air through a batch transaction.

Figure 3.3-9. Use Case: Edit Informal Enforcement Action—Batch
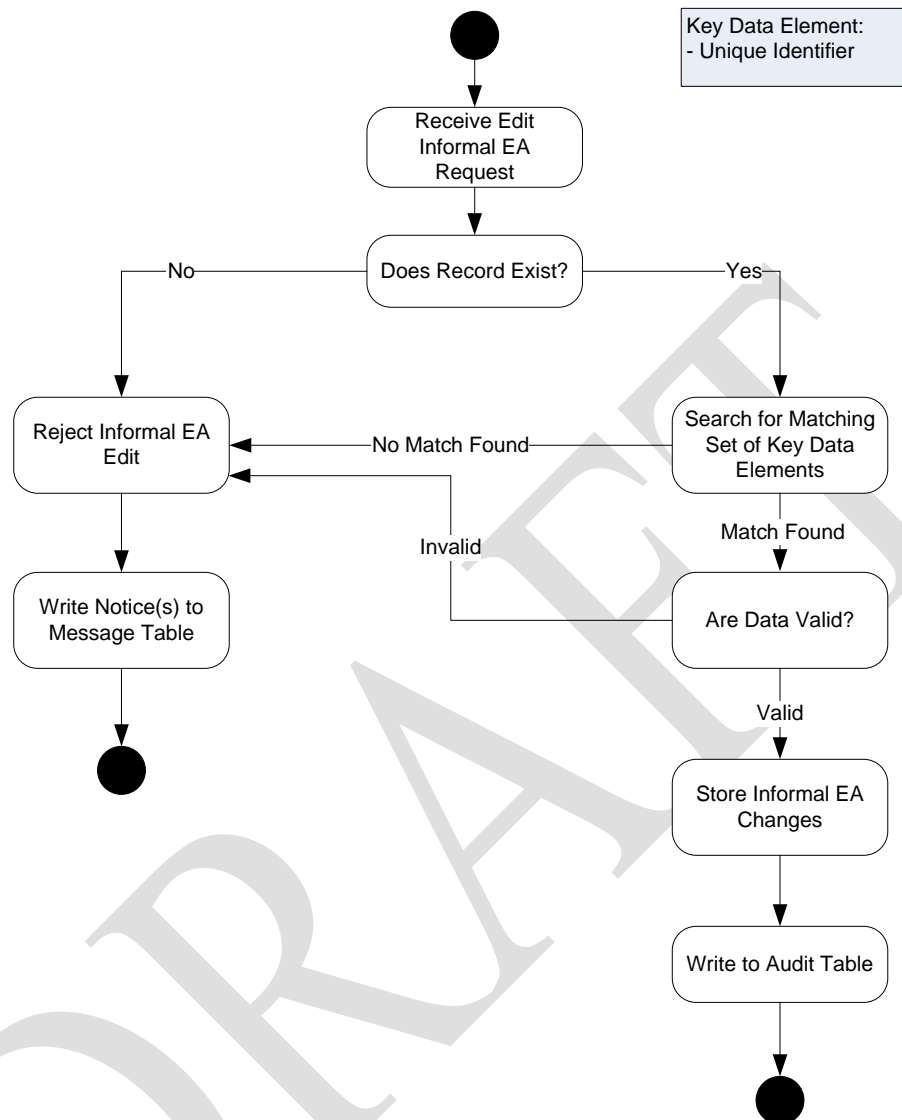
Key Data Element:
- Unique Identifier

Receive Edit Informal EA Request

Does Record Exist?

Reject Informal EA Edit

Search for Matching Set of Key Data Elements

No Match Found

Match Found

Invalid

Write Notice(s) to Message Table

Are Data Valid?

Valid

Store Informal EA Changes

Write to Audit Table

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.3.2.3, Informal Enforcement Actions Data Elements, and Section 3.3.2.4, Informal Enforcement Actions Business Rules, for more details.

Users may edit An Informal Enforcement Action by accessing the List Informal Enforcement Actions screen, selecting the Unique Identifier link for that Informal Enforcement Actions. ICIS-Air will display the Edit Informal Enforcement Actions screen for the selected Informal Enforcement Actions.

Figure 3.3-10 illustrates the processing required for editing an Informal Enforcement Action in ICIS-Air online.

Figure 3.3-10. Use Case: Edit Informal Enforcement Action—Web
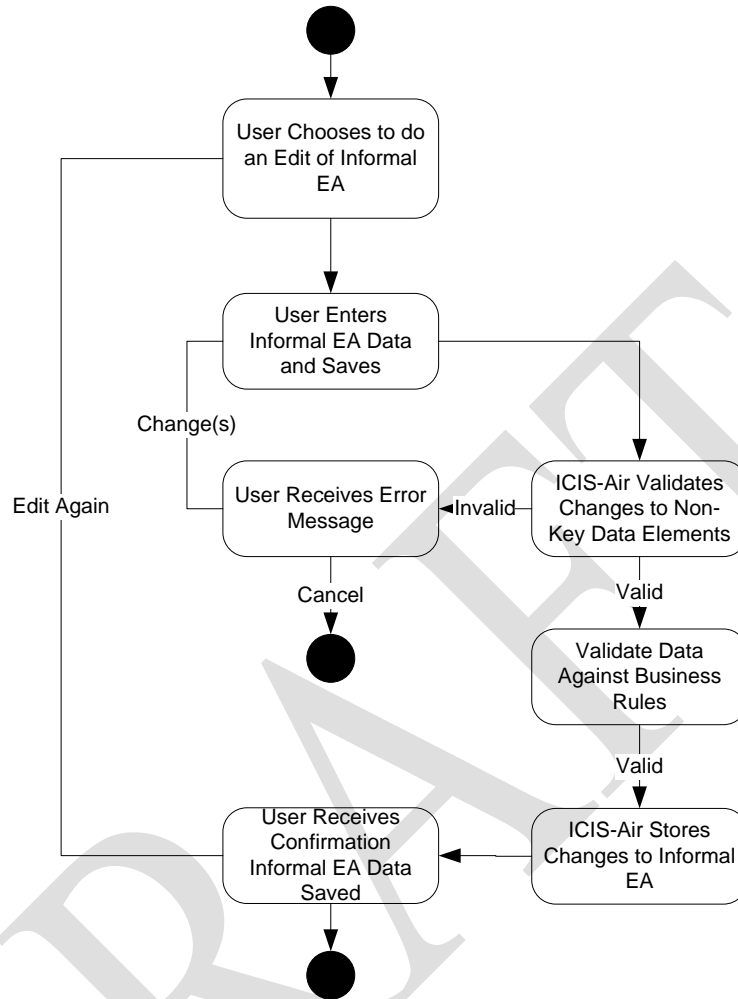
Users must have the Edit Informal Enforcement Actions role to edit an existing Informal Enforcement Actions.

Figure 3.3-11 shows the notional Edit Informal Enforcement Action screen for Delegated Agencies. Figure 3.3-12 shows the notional Edit Informal Enforcement Actions screen for EPA Users. Note: Each figure is one continuous screen but broken into multiple parts for legibility.

Figure 3.3-11. Notional Screen: Edit Informal Enforcement Action (Delegated Agencies)

Violating Pollutants									Manage Pollutants	

Pollutants:
Plus sign (+) indicates pollutant is not on Facility record.

Benzoperylene
Carbon Monoxide
Mercury
+PM2.5

Contacts   Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization
Frost	Theodore	Robert	Lead Attorney	1 Main St, Annapolis	301-555-1234		tfrost@example.gov	MDNR AG	MDNR

Cross Media Indicators

Federal Facility Activity: [▼]   Federal Facility Activity Comment: [   ]

User Defined Fields   **Sensitive:** ☑

1: ☑

2: [   ]   3: [   ]

4: [05/01/2010] 📅   5: [   ] 📅

6: [   ]

Comments   Manage Comments

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Henri	Comments about this EA.	Yes
04/03/2010	Shannon Lee	Need to obtain more information.	
03/10/2010	David Tech	This is a comment about this EA.	

Created By: Jane Smith Created Date: 04/02/2010
Last Modified By: George Washington Last Modified Date: 04/10/2012

Save & Exit   Save & Continue   Save & Add Linked Activity [Select Type ▼]   Cancel

Figure 3.3-12. Notional Screen: Edit Informal Enforcement Action (EPA)

Violating Pollutants

Manage Pollutants

Pollutants:

Plus sign (+) indicates pollutant is not on Facility record.

Benzoperylene
Carbon Monoxide
Mercury
+PM2.5

Government Citations

Manage Citations

Title	Part	Section

Contacts

Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization
Frost	Theodore	Robert	Lead Attorney	Ariel Rios South, Wash	202-555-1234		maxwell.frost@example.gov	OC	USEPA

Cross Media Indicators

Federal Facility Activity:

Federal Facility Activity Comment:

User Defined Fields

Sensitive: ☑

1: ☑

2:

3:

4: 05/01/2010

5:

6:

Comments

Manage Comments

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Henri	Comments about this EA.	Yes
04/03/2010	Shannon Lee	Need to obtain more information.	
03/10/2010	David Tech	This is a comment about this EA.	

Created By: Jane Smith Created Date: 04/02/2010
Last Modified By: George Washington Last Modified Date: 04/10/2012

Save & Exit   Save & Continue   Save & Add Linked Activity   Select Type   Cancel

3.3.2.7 Delete Informal Enforcement Action

When users delete an Informal Enforcement Action, the Informal Enforcement Action and all child records for that Compliance Monitoring activity will be deleted. The child records include:

- Links to FCEs/PCEs/Investigations/Information Requests
- Links to Links to TVACCs
- Links to Stack Tests
- Links to CEM/EERs
- Links to Enforcement Actions

Batch

Batch users will have Delete Informal Enforcement Actions transactions rejected if the record does not exist or the business rules are violated.

Figure 3.3-13 illustrates the processing required for deleting an Informal Enforcement Action from ICIS-Air through a batch transaction.

Figure 3.3-13. Use Case: Delete Informal Enforcement Action—Batch
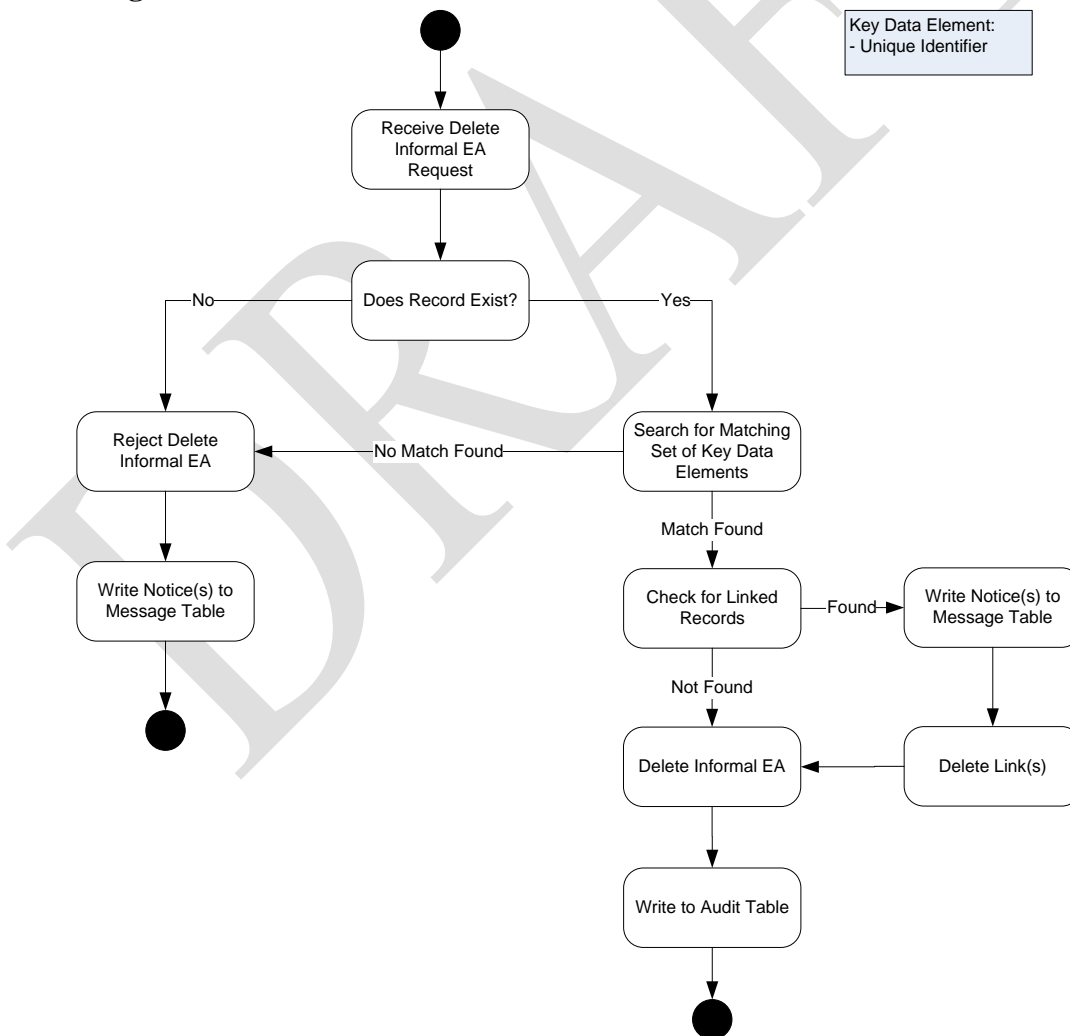
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Figure 3.3-14 illustrates the processing required for deleting an Informal Enforcement Action from ICIS-Air online.

Figure 3.3-14. Use Case: Delete Informal Enforcement Action—Web
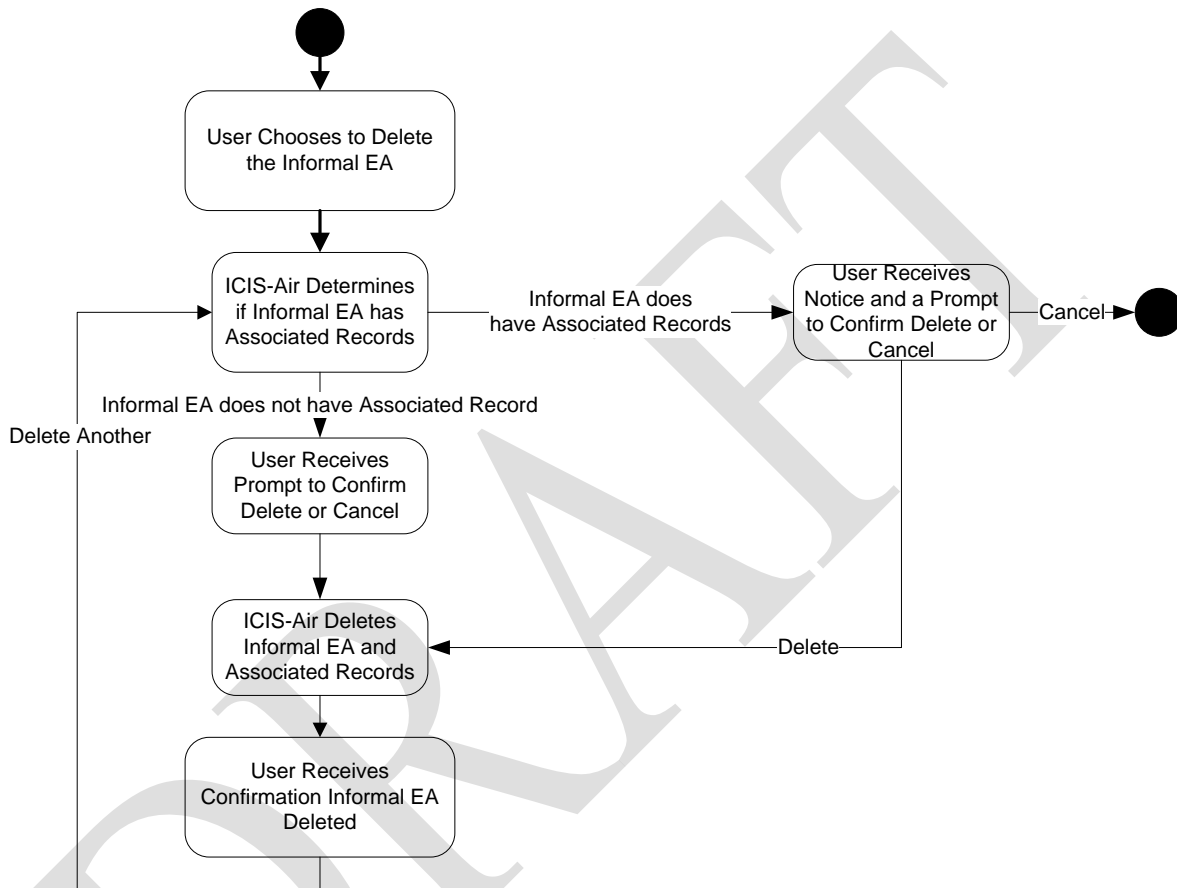
3.3.3 Formal Enforcement Actions (Delegated Agencies)

A Formal Enforcement Action by Delegated Agency may begin with notice of violation or with the issuance of an Administrative Order (either with or without penalties) to bring about compliance. These also include Judicial Actions, which are formal lawsuits, filed in court, against persons or entities that have failed to comply with statutory or regulatory requirements or with an Administrative Order. A Final Order is the document in which the EPA and the Respondent settle an administrative action.

The requirements, functionality, data elements, and business rules that support the processing of Formal Enforcement Actions are detailed in the following subsections.

3.3.3.1 Summary of Formal Enforcement Actions for Delegated Agencies in ICIS-Air

Some Formal Enforcement Actions functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. See Section 3.3.1.1 for the summary of Enforcement Action modernization in ICIS-Air.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Formal Enforcement Actions for Delegated Agencies in ICIS-Air.

3.3.3.2 Formal Enforcement Action (Delegated Agency) Functional Requirements

Table 3.3-5 lists the requirements that apply to Formal Enforcement Actions for Delegated Agencies. It includes functions that are allowed and business rules within a function.

Table 3.3-5. ICIS-Air Formal Enforcement Action (Delegated Agency) Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.4, 5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall allow the user to view Formal Enforcement Action data.	ICIS-Air version 1.0
2.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall allow the user to add a new Formal Enforcement Action record.	ICIS-Air version 1.0
3.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall allow the user to edit existing Formal Enforcement Action data.	ICIS-Air version 1.0
4.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall allow the user to delete an existing Formal Enforcement Action record.	ICIS-Air version 1.0
5.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall allow the user to access the Add Formal Enforcement Action screen from the homepage.	ICIS-Air version 1.0
6.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall allow the user to access the Add Formal Enforcement Action screen from within a Facility.	ICIS-Air version 1.0
7.	5.4.1, 5.4.4, 5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3, 5.15.1,	EPA SRS	The system shall display the following data elements on the Formal Enforcement Actions screen for Delegated Agency Users: • Facility ID	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

	5.15.2		• Facility Name
			• FRS ID
			• Programmatic ID
			• Address
			• Unique Identifier
			• Enforcement Action Name
			• Enforcement Action Type
			• Issued By
			• Agency Lead Indicator
			• Enforcement Agency Type
			• Enforcement Agency Name
			• Enforcement Action Status
			• Status Date
			• Federal Statutes Violated
			• Programs Violated
			• Subparts Violated
			• Pollutant(s)
			• Referral Date
			• Air Resolved Date
			• Proposed Penalty
			• Linked Alleged Violation Files
			  – Facility ID
			  – Facility Name
			  – Unique Identifier
			  – Alleged Violation File Name
			  – Agency
			  – Policy Indicator
			  – Sensitive?
			• Final Orders
			  – Final Order ID
			  – Final Order Type
			  – Final Order Name
			  – Complaint Proposed Order Date
			  – Final Order Issued Date
			  – Final Assessed Penalty
			  – Penalty Collected
			  – SEP?
			• Contacts and Addresses
			  – Role
			  – First Name
			  – Last Name
			  – Address
			  – Phone
			  – Fax
			  – E-mail
			  – Office
			  – Organization
			• OECA National Priority
			• Regional Priority
			• OECA Core Program
			• State Priority
			• Court Docket Number
			• Court Case Name
			• Enforcement Case Summary
			• Comments
			• User Defined Field 1
			• User Defined Field 2
			• User Defined Field 3
			• User Defined Field 4	

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• User Defined Field 5 • User Defined Field 6	
8.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall enforce the security model for the users to view, add, edit, and delete a Formal Enforcement Action. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
9.	N/A	SME	The system shall allow the user to enter multiple comments for a Formal Enforcement Action record.	ICIS-Air version 1.0
10.	N/A	Comment Adjudication 8/24/2012	The system shall allow the user to enter multiple Supplemental Environmental Projects (SEPs) per Final Order for a Formal Enforcement Action record.	ICIS-Air version 1.0

3.3.3.3   Formal Enforcement Action (Delegated Agency) Data Requirements

Table 3.3-6 lists the data element requirements that apply to Formal Enforcement Actions for Delegated Agencies. This table includes the system, minimum data requirements, and possible future data elements. Note: References to REF tables are place holders and values for the REF tables will be reviewed during the Design phase.

Table 3.3-6. ICIS-Air Formal Enforcement Action (Delegated Agency) Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement
1.	N	Y	Y	N	5.9.11	Facility ID • Foreign Key of Linked Facility
2.	Y	Y	Y	N	N/A	Unique Identifier • User Defined or System Generated • Alphanumeric (15)
3.	N	N	N	N	N/A	Enforcement Action Name • Alphanumeric (100) • Free-form text
4.	N	Y	Y	N	N/A	Enforcement Action Type • Must be validated against REF table
5.	N	Y	Y	N	N/A	Issued By • Valid Values: – EPA – State – Tribe – LCON
6.	N	N	N	N	N/A	Agency • Valid Values: – U.S. EPA – State – Tribe – Local Government – State Contractor – EPA Contractor – EPA Grantee (not State)
7.	N	N	N	N	N/A	Enforcement Agency Type • Multiselect • Must be validated against REF table
8.	N	N	N	N	N/A	Enforcement Agency Name • Alphanumeric (100) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Requirement
9.	N	N	N	Y	N/A	Status • Valid Values: – Complaint Filed – Enforcement Action Data Entered – Final Order Entered – Final Order Issued – Referred – Resolved
10.	N	N	N	Y	N/A	Status Date • Date
11.	N	N	N	N	N/A	Referral Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
12.	N	N	N	N	Comment Adjudication 8/24/2012	Referred To • Must be validated against REF table • Valid Values: – Department of Justice – State Attorney General
13.	N	N	N	N	N/A	Air Resolved Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
14.	N	N	Y	N	N/A	Proposed Penalty • Number
15.	N	Y	Y	Y	N/A	Federal Statutes Violated: • Must be validated against REF table • Defaults to CAA
16.	N	Y	Y	N	N/A	Applicable Programs • Multiselect • Dynamically populated based on Federal Law Sections (Federal) • Defaults to Clean Air Act programs (for Delegated Agency users, or Federal users entering Delegated Agency records) • Must be validated against REF_PROGRAM table
17.	N	N	N	N	N/A	Subparts Violated • Multiselect • Dynamically populated based on Program(s) Violated • Must be validated against REF table
18.	N	N	N	N	N/A	State Sections Violated • Alphanumeric (200) • Free-form text
19.	N	Y	Y	N	N/A	Applicable Air Pollutants • Multiselect • Must be validated against REF_POLLUTANT table for Air Pollutants
20.	N	Y	Y	N	N/A	Alleged Violation File Unique Identifier • Foreign Key to AVF • Can have multiple
21.	N	N	N	N	N/A	Final Order ID • System Generated • Number • Can have multiple
22.	N	N	N	N	N/A	Final Order Type • Must be validated against REF table

ID	Key?	SR	PR	SG	Client Req ID	Requirement
23.	N	N	N	N	N/A	Final Order Name • Alphanumeric (100) • Free-form text
24.	N	N	N	N	N/A	Complaint/Proposed Order Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
25.	N	N	N	N	N/A	Final Order Issued Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
26.	N	N	N	N	N/A	Final Assessed Penalty • Number
27.	N	N	N	N	N/A	Penalty Collected • Number
28.	N	N	N	N	Comment Adjudication 8/10 and 8/24	Penalty Collected Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
29.	N	N	N	N	N/A	SEP Flag • Alphanumeric (1) • Valid Values: – N (Default) – Y
30.	N	N	N	N	Comment Adjudication Meeting 8/10	SEP Type • Must be validated against REF table • Valid Values: – SEP – Non-SEP Environmental Improvement Program
31.	N	N	N	N	Comment Adjudication Meeting 8/10	SEP Amount/Value • Number
32.	N	N	N	N	Comment Adjudication Meeting 8/10	SEP Date Completed • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
33.	N	N	N	N	Comment Adjudication Meeting 8/10	SEP Description • Alphanumeric (200) • Free-form text
34.	N	N	N	N	N/A	Contact Person ID • Foreign Key to Contacts • Can have multiple
35.	N	N	N	N	N/A	National Initiatives • Multiselect • Must be validated against REF_PRIORITY table
36.	N	N	N	N	N/A	Regional Priority • Multiselect • Must be validated against REF table
37.	N	N	N	N	N/A	OECA Core Program • Alphanumeric (1) • Valid Values: – N (Default) – Y
38.	N	N	N	N	N/A	State Priority • Alphanumeric (200) • Free-form text

ID	Key?	SR	PR	SG	Client Req ID	Requirement
39.	N	N	N	N	N/A	Court Docket Number • Alphanumeric (100) • Free-form text • Can have multiple
40.	N	N	N	N	N/A	Court Case Name • Alphanumeric (100) • Free-form text
41.	N	N	N	N	N/A	Case Summary • Alphanumeric (500) • Free-form text
42.	N	N	N	N	N/A	Comments • Multiple for an Formal Enforcement Action record • Alphanumeric (500) • Free-form text
43.	N	N	N	Y	N/A	Comment Entered On • Date • System generated
44.	N	N	N	Y	N/A	Comment Entered By • Alphanumeric (50) • System generated
45.	N	N	N	N	N/A	Sensitive Comment • Alphanumeric (1) • Valid Values: – N – Y (Default)
46.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	User Defined Field Enforcement Sensitive Flag • Alphanumeric (1) • Valid Values: – Y (default) – N
47.	N	N	N	N	N/A	User Defined Field 1 • Alphanumeric (1) • Valid Values: – N (Default) – Y
48.	N	N	N	N	N/A	User Defined Field 2 • Alphanumeric (100) • Free-form text
49.	N	N	N	N	N/A	User Defined Field 3 • Alphanumeric (100) • Free-form text
50.	N	N	N	N	N/A	User Defined Field 4 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
51.	N	N	N	N	N/A	User Defined Field 5 • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
52.	N	N	N	N	N/A	User Defined Field 6 • Alphanumeric (500) • Free-form text
53.	N	N	N	Y		Created By • System Generated based upon User ID

ID	Key?	SR	PR	SG	Client Req ID	Requirement
54.	N	N	N	Y		Created Date • System Generated • Date
55.	N	N	N	Y		Last Modified By • System Generated based upon User ID
56.	N	N	N	Y		Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.3.3.4 Formal Enforcement Action (Delegated Agency) Business Rule Requirements

Table 3.3-7 lists the business rules requirements that apply to Formal Enforcement Actions for Delegated Agencies. This table includes the business rules for data elements and error handling.

Table 3.3-7. ICIS-Air Formal Enforcement Action (Delegated Agency) Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The system shall ensure that the Formal Enforcement Action is associated to an existing Facility ID.	ICIS-Air version 1.0
2.	N/A	The system shall ensure that a Formal Enforcement Action is associated to one or many Facilities.	ICIS-Air version 1.0
3.	N/A	The system shall ensure that an Enforcement Action eligible to be related must already exist in the system.	ICIS-Air version 1.0
4.	N/A	The system shall ensure that a Compliance Monitoring Activity eligible to be related must already exist in the system.	ICIS-Air version 1.0
5.	5.10.2	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Formal Enforcement Action data.	ICIS-Air version 1.0
6.	5.10.2	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all edited Formal Enforcement Action data.	ICIS-Air version 1.0
7.	5.10.6	The system shall ensure Civil Referral activities are Enforcement Sensitive.	ICIS-Air version 1.0
8.	N/A	The system shall default the Addressing Action Type and Date on the Alleged Violation File with the Formal Enforcement Action Type and Air Status Date if the Formal Enforcement Action is being linked to an Alleged Violation File.	ICIS-Air version 1.0
9.	N/A	The system shall default the Resolving Action Type and Air Resolved Date on the Alleged Violation File with the Formal Enforcement Action Type if the Formal Enforcement Action is being linked to an Alleged Violation File and there are no remaining unresolved Enforcement Actions linked to the Alleged Violation File.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
10.	N/A	The system shall set the Status to the most recent Milestone Activity status. • Enforcement Action Data Entered: if Enforcement Action entered, but no Formal Order exists and Referred Date and Air Resolved Date have not been entered • Final Order Entered: Formal Order exists, but Complaint/Proposed Order Date, Final Order Issued Date, Referred Date, and Air Resolved Date have not been entered • Complaint Filed: Complaint/Proposed Order Date exists, but Final Order Issued Date, Referred Date, and Air Resolved Date have not been entered • Final Order Issued: Final Order Issued Date exists, but Referred Date and Air Resolved Date have not been entered • Referred: Referred Date exists, but Air Resolved Date has not been entered • Resolved: Air Resolved Date is not null	ICIS-Air version 1.0
11.	N/A	The system shall set the Status Date to the most recent Milestone Activity Date: • Enforcement Action Data Entered: if Enforcement Action entered, but no Formal Order exists and Referred Date and Air Resolved Date have not been entered, then Status Date = Date Enforcement Action record created • Final Order Entered: Formal Order exists, but Complaint/Proposed Order Date, Final Order Issued Date, Referred Date, and Air Resolved Date have not been entered, then Status Date = Date Final Order record created • Complaint Filed: Complaint/Proposed Order Date exists, but Final Order Issued Date, Referred Date, and Air Resolved Date have not been entered, then Status Date = Complaint/Proposed Order Date • Final Order Issued: Final Order Issued Date exists, but Referred Date and Air Resolved Date have not been entered, then Status Date = Final Order Issued Date • Referred: Referred Date exists, but Air Resolved Date has not been entered, then Status Date = Referred Date • Resolved: Air Resolved Date is not null, then Status Date = Air Resolved Date	ICIS-Air version 1.0
12.	N/A	The system shall ensure that the Final Order Issued Date is greater than or equal to the Complaint/Proposed Order Date.	ICIS-Air version 1.0
13.	N/A	The system shall ensure that the Air Resolved Date is greater than or equal to the Referral Date.	ICIS-Air version 1.0
14.	N/A	The system shall ensure that the Air Resolved Date is greater than the Complaint/Proposed Order Date.	ICIS-Air version 1.0
15.	N/A	The system shall ensure that the Air Resolved Date is greater than the Final Order Issued Date.	ICIS-Air version 1.0

3.3.3.5   Add Formal Enforcement Action (Delegated Agency)

Users may enter a Formal Enforcement Action against an existing Facility. Users must have the Add Formal Enforcement Actions privileges to add a new Formal Enforcement Action.

A Formal Enforcement Action is uniquely identified by the following key data elements:

• Unique Identifier

The following data elements are required to add a new Formal Enforcement Action in ICIS-Air:

• Facility ID (can be multiple)
• Enforcement Action Type

- Issued By
- Federal Statute Violated
- Programs Violated
- Pollutants
- Linked Alleged Violation File(s).

Batch

Batch users will have an Add Formal Enforcement Action transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.3.3.3, Formal Enforcement Action Data Elements, and Section 3.3.3.4, Formal Enforcement Action Business Rules, for more details.

Figure 3.3-15 illustrates the processing required for adding a Formal Enforcement Action to ICIS-Air through a batch transaction.

Figure 3.3-15. Use Case: Add Formal Enforcement Actions (Delegated Agency)—Batch
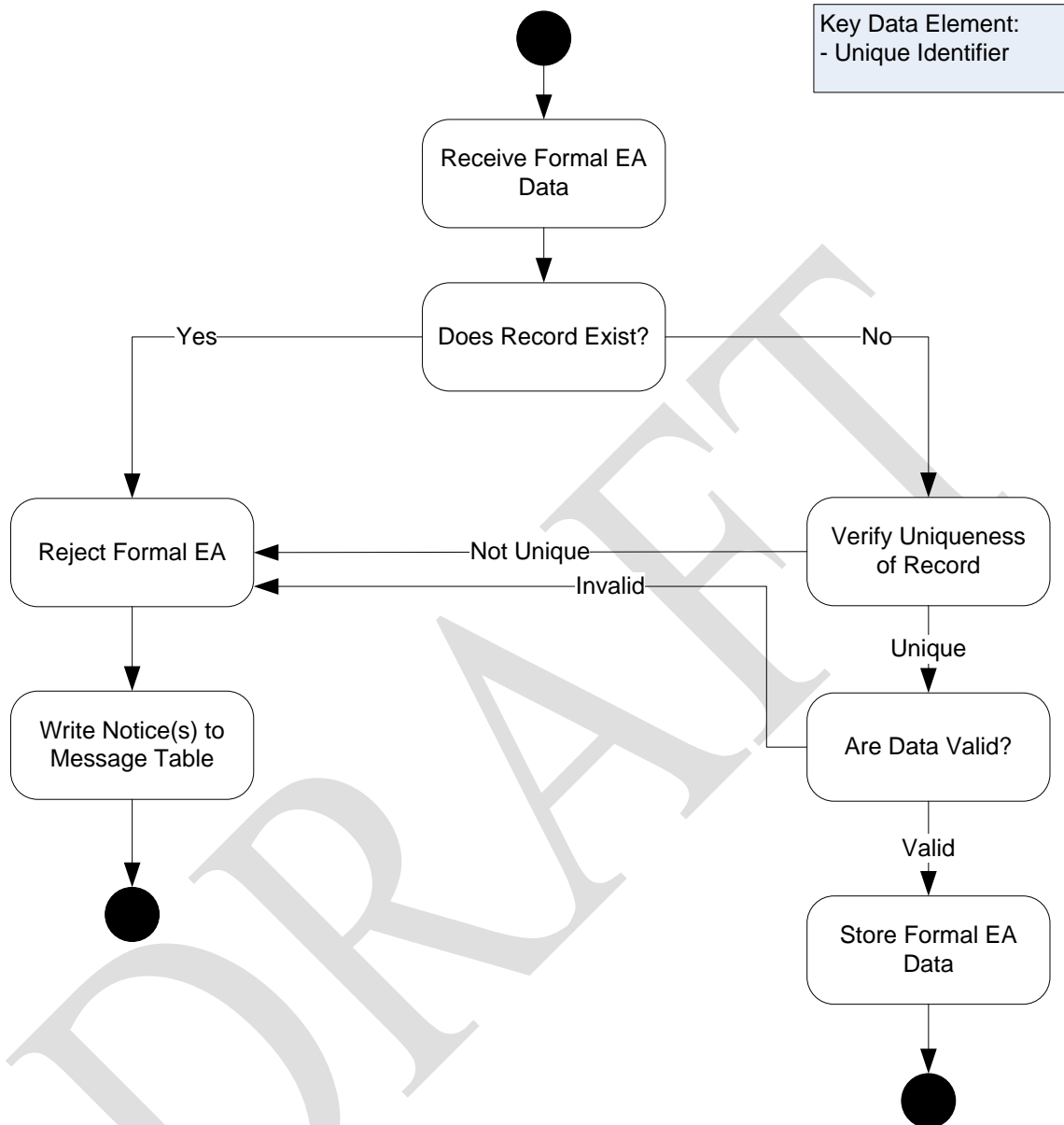
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.3.3.3, Formal Enforcement Actions Data Elements, and Section 3.3.3.4, Formal Enforcement Actions Business Rules, for more details.

Users can add a new Formal Enforcement Action by clicking on one of the Add Formal Enforcement Action links on the Home Page.

Figure 3.3-16 illustrates the processing required for adding a Formal Enforcement Action in ICIS-Air online.

Figure 3.3-16. Use Case: Add Formal Enforcement Actions (Delegated Agency) —Web
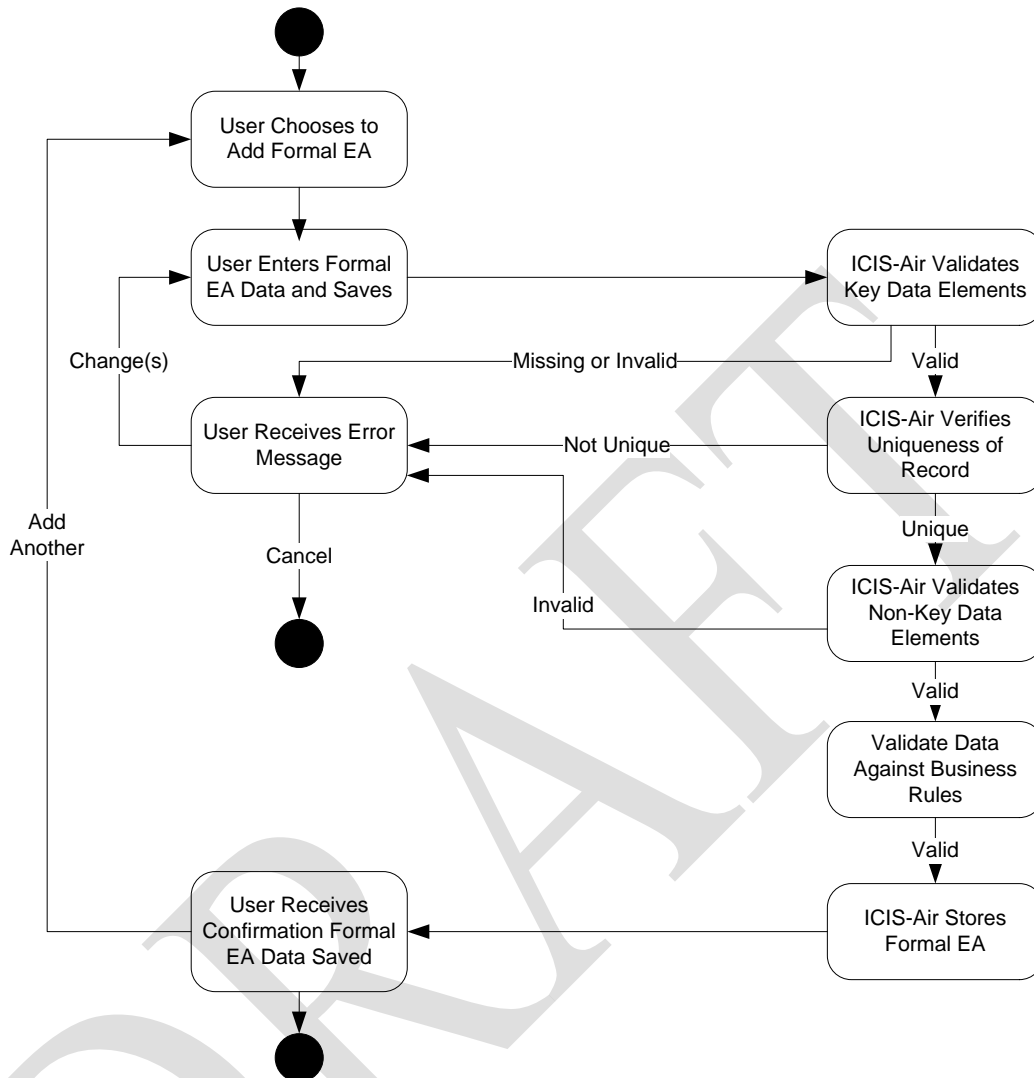
Figure 3.3-17shows the notional Add Formal Enforcement Action screen for Delegated Agencies. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.3-17. Notional Screen: Add Formal Enforcement Action (Delegated Agency)

Linked Alleged Violation Files | Manage Alleged Violation Files

Facility ID | Facility Name | Unique Identifier | Alleged Violation File Name | Lead Agency | Policy Indicator | Sensitive?

Final Orders | Add Another Final Order Row

Final Order ID | Final Order Type | Final Order Name | Complaint/Proposed Order | Final Order Issued | Final Assessed Penalty | Penalty Collected | Penalty Collected Date | SEP?

Contacts | Manage Contacts

Last Name | First Name | Middle Name | Role | Address | Phone | Fax | E-mail | Office | Organization

Priorities

OECA National Priority:
2012 - Air Toxics - Excess Emissions
2012 - Air Toxics - Flares

Regional Priority:
2012 - Region 01 - Accident Prevention
2012 - Region 01 - Air Toxics

OECA Core Program: ☐

State Priority:

Court Information

Court Docket Number:

Manage Court Docket Numbers

Court Case Name:

User Defined Fields | Sensitive: ☑

1: ☐
2:
3:
4:
5:
6:

Enforcement Case Summary for Public Distribution
Note: Information in this field is intended to be distributed to the public via ECHO.
DO NOT input any enforcement sensitive information here. Sensitive infromation should be entered into the Sensitive Comment field.

Comments | Manage Comments

Entered On | Entered By | Comments | Sensitive?

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

Save & Exit | Save & Continue | Save & Add Linked Activity | Select Type | Cancel

3.3.3.6   Edit Formal Enforcement Actions (Delegated Agency)

Users can edit a Formal Enforcement Action within the current view of the Formal Enforcement Actions record. A user will also have the ability to link the Formal Enforcement Actions to Compliance Monitoring activities and Enforcement Actions.

The following data elements are key data elements that uniquely identify a Formal Enforcement Action record and cannot be edited through the Edit Formal Enforcement Actions transaction:

- Unique Identifier

The following data elements are system generated or cannot be modified after the initial Formal Enforcement Actions record was created and cannot be edited through the Edit Formal Enforcement Actions transaction:

- Facility ID
- Issued By.

Batch

Batch users will have an Edit Formal Enforcement Actions transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.3.3.3 and business rules in Section 3.3.3.4 for more details on rejecting Formal Enforcement Actions edit transactions.

Figure 3.3-18 illustrates the processing required for editing a Formal Enforcement Action in ICIS-Air through a batch transaction.

Figure 3.3-18. Use Case: Edit Compliance Monitoring—Batch (Delegated Agency)
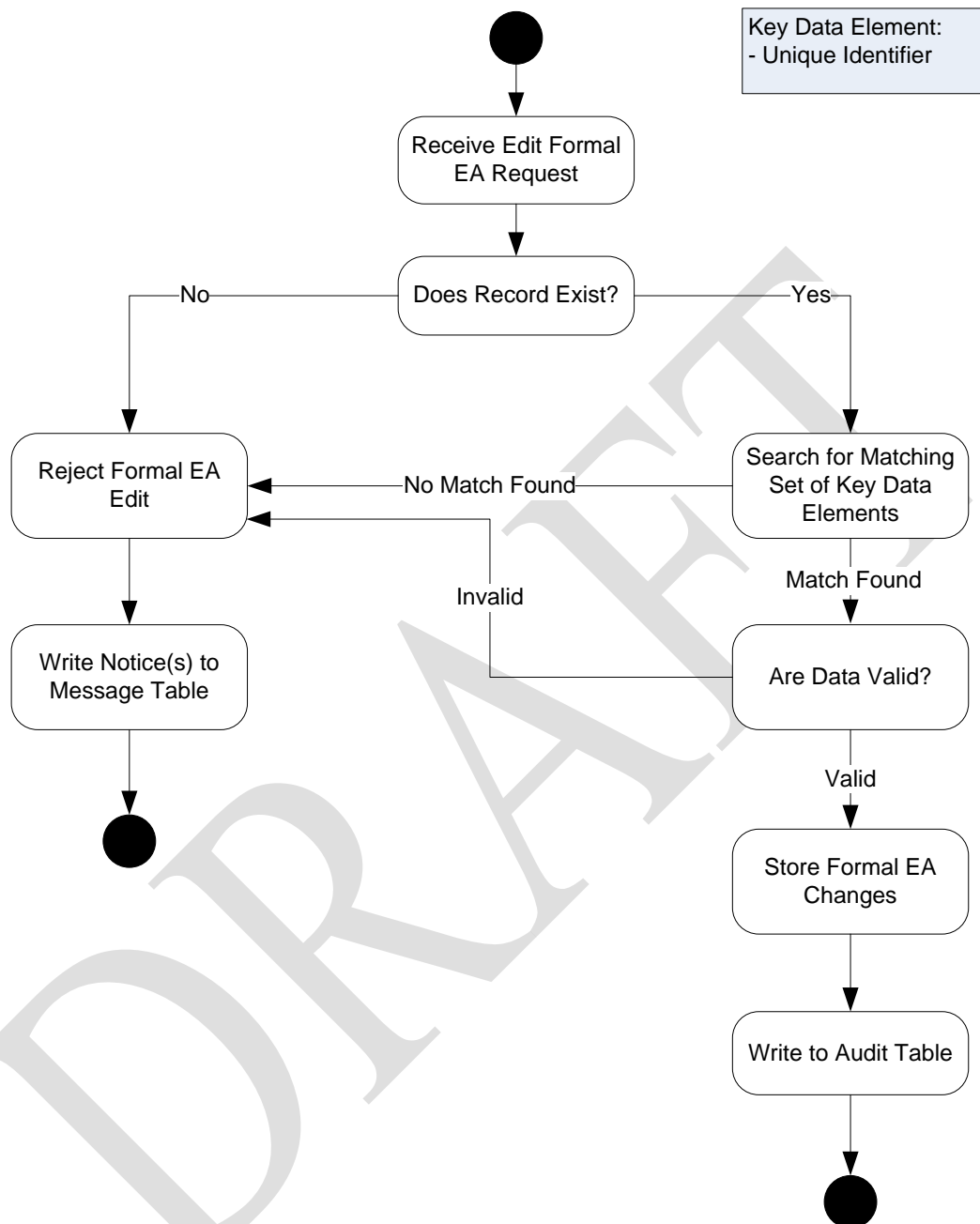
Key Data Element:
- Unique Identifier

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.3.3.3, Formal Enforcement Actions Data Elements, and Section 3.3.3.4, Formal Enforcement Actions Business Rules, for more details.

Users may edit A Formal Enforcement Action by accessing the List Formal Enforcement Actions screen, selecting the Unique Identifier link for that Formal Enforcement Actions. ICIS-

Air will display the Edit Formal Enforcement Actions screen for the selected Formal Enforcement Actions.

Figure 3.3-19 illustrates the processing required for editing a Formal Enforcement Action in ICIS-Air online.

Figure 3.3-19. Use Case: Edit Formal Enforcement Actions (Delegated Agency)—Web
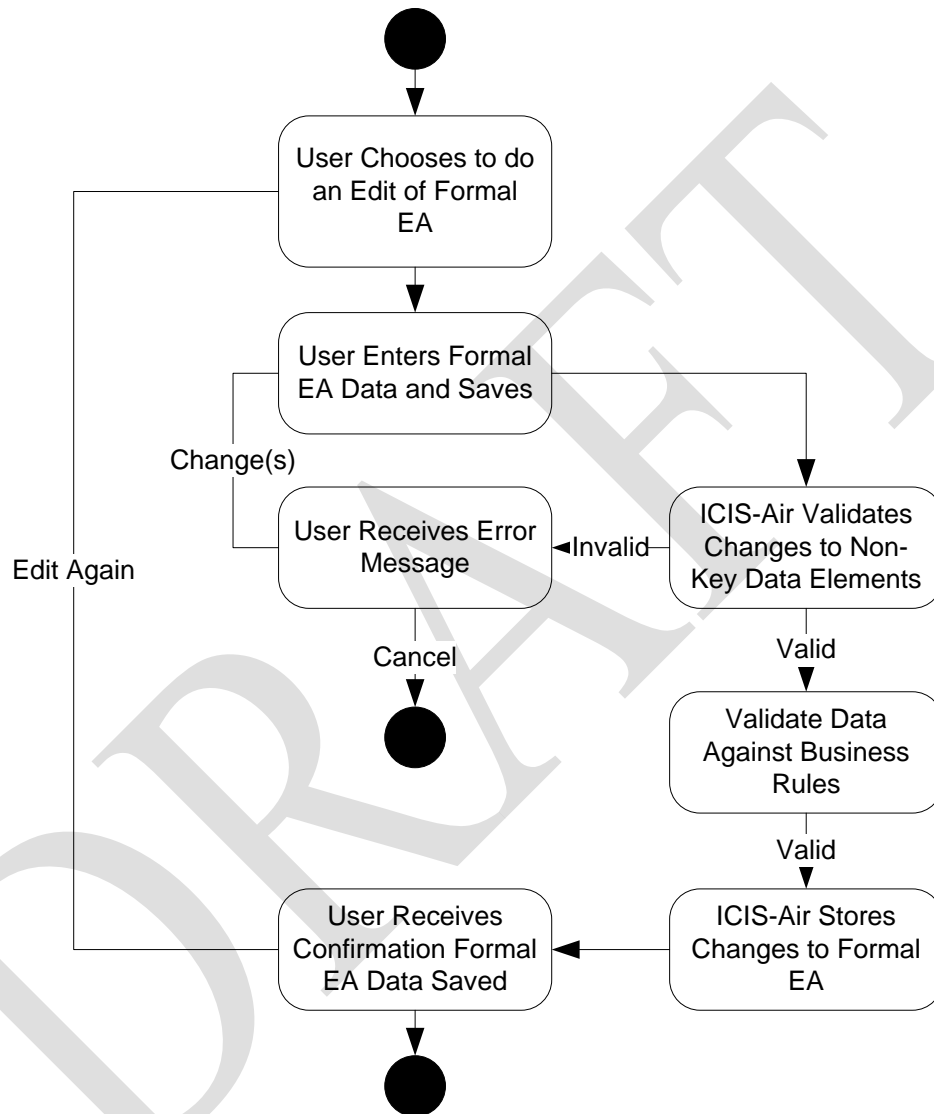
Users must have the Edit Formal Enforcement Actions role to edit an existing Formal Enforcement Action.

Figure 3.3-20 shows the notional Edit Formal Enforcement Action screen for Delegated Agencies. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.3-20. Notional Screen: Edit Formal Enforcement Action (Delegated Agency)

Final Orders

Add Another Final Order Row

Final Order ID	Final Order Type	Final Order Name	Complaint/Proposed Order	Final Order Issued	Final Assessed Penalty	Penalty Collected	Penalty Collected Date	SEP?
1	Administrative Compliance ▼	ABC Green ACO 2012		04/10/2012	30000			☐

Contacts

Manage Contacts

Last Name	First Name	Middle Name	Role	Address	Phone	Fax	E-mail	Office	Organization
Frost	Theodore	Robert	Lead Attorney	1 Main St, Annapolis	301-555-1234		tfrost@example.gov	MDNR AG	MDNR

Priorities

Court Information

OECA National Priority:
2012 - Air Toxics - Excess Emissions
2012 - Air Toxics - Flares

Court Docket Number:

Regional Priority:
2012 - Region 01 - Accident Prevention
2012 - Region 01 - Air Toxics

OECA Core Program: ☐

Manage Court Docket Numbers

State Priority:

Court Case Name:

User Defined Fields   **Sensitive:** ☑

1: ☑

2: User Defined   3:

4:          5:

6:

Enforcement Case Summary for Public Distribution
Note: Information in this field is intended to be distributed to the public via ECHO.
DO NOT input any enforcement sensitive information here. Sensitive infromation should be entered into the Sensitive Comment field.

Public Case Summary/notes

Comments

Manage Comments

Entered On	Entered By	Comments	Sensitive?
05/30/2010	Vince Smith	Comments about this EA.	Yes

Created By: Jane Smith Created Date: 04/02/2010
Last Modified By: George Washington Last Modified Date: 04/10/2012

Save & Exit   Save & Continue   Save & Add Linked Activity   Select Type ▼   Cancel

Users will have the ability to link and unlink the current Formal Enforcement Actions record to related Compliance Monitoring and Enforcement Action activities. The Related Activities screen will be blank for new Formal Enforcement Action records. Figure 3.3-21 shows the related activities that have been linked to the current Formal Enforcement Action.

Figure 3.3-21. Notional Screen: Related Activities

Users can click on the List More Eligible to Link button from the Linked Activities screen to list additional activities. Figure 3.3-22 shows the notional list of activities eligible to be linked to the Formal Enforcement Action.

Figure 3.3-22. Notional Screen: List of Activities Eligible to be Linked

3.3.3.7 *Delete Formal Enforcement Actions (Delegated Agency)*

When users delete a Formal Enforcement Action, the Formal Enforcement Action and all child records for that Compliance Monitoring activity will be deleted. The child records include:

- Links to FCEs/PCEs/Investigations/Information Requests
- Links to Links to TVACCs
- Links to Stack Tests
- Links to CEM/EERs
- Links to Enforcement Actions

Batch

Batch users will have Delete Formal Enforcement Actions transactions rejected if the record does not exist or the business rules are violated.

Figure 3.3-23 illustrates the processing required for deleting a Formal Enforcement Action from ICIS-Air through a batch transaction.

Figure 3.3-23. Use Case: Delete Formal Enforcement Actions (Delegated Agency)—Batch
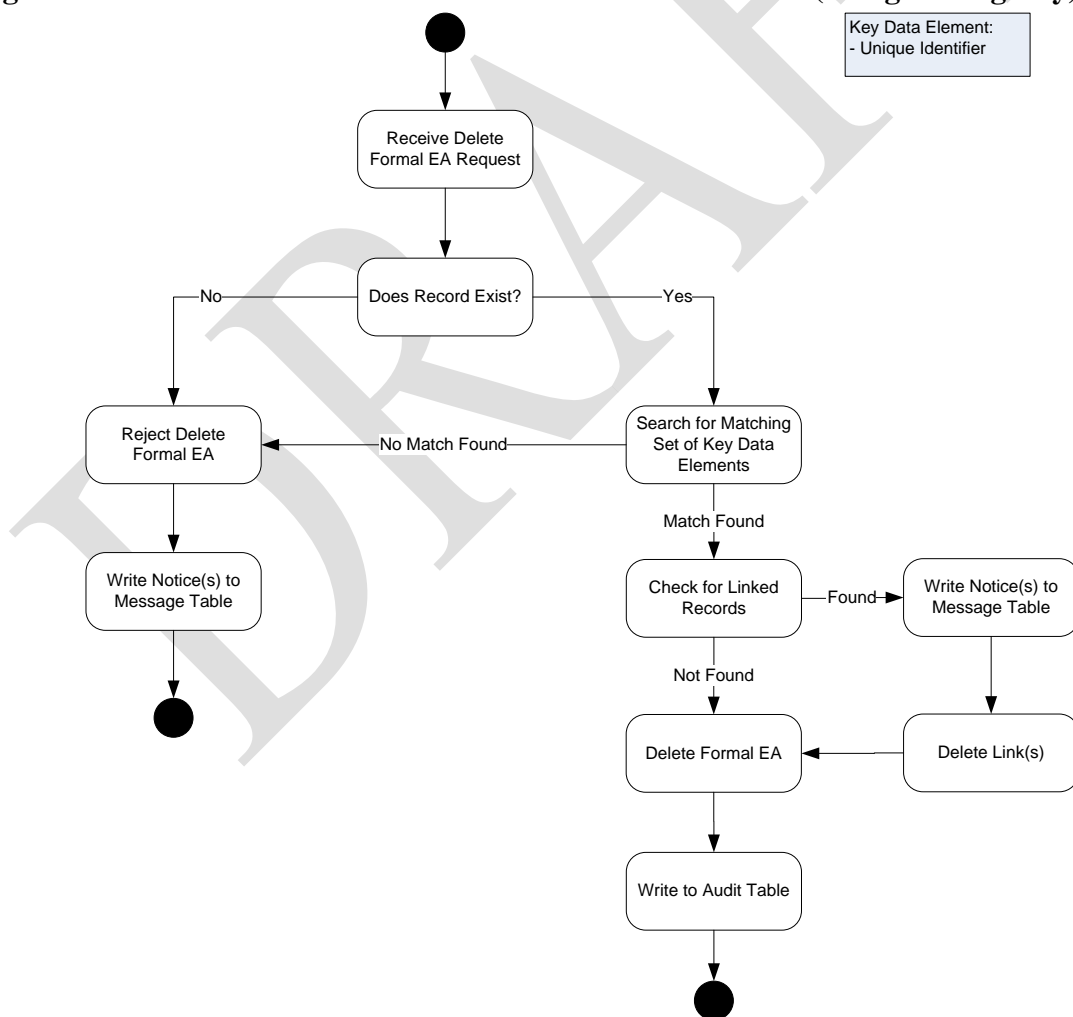
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Figure 3.3-24 illustrates the processing required for deleting a Formal Enforcement Action from ICIS-Air online.

Figure 3.3-24. Use Case: Delete Formal Enforcement Actions (Delegated Agency)—Web
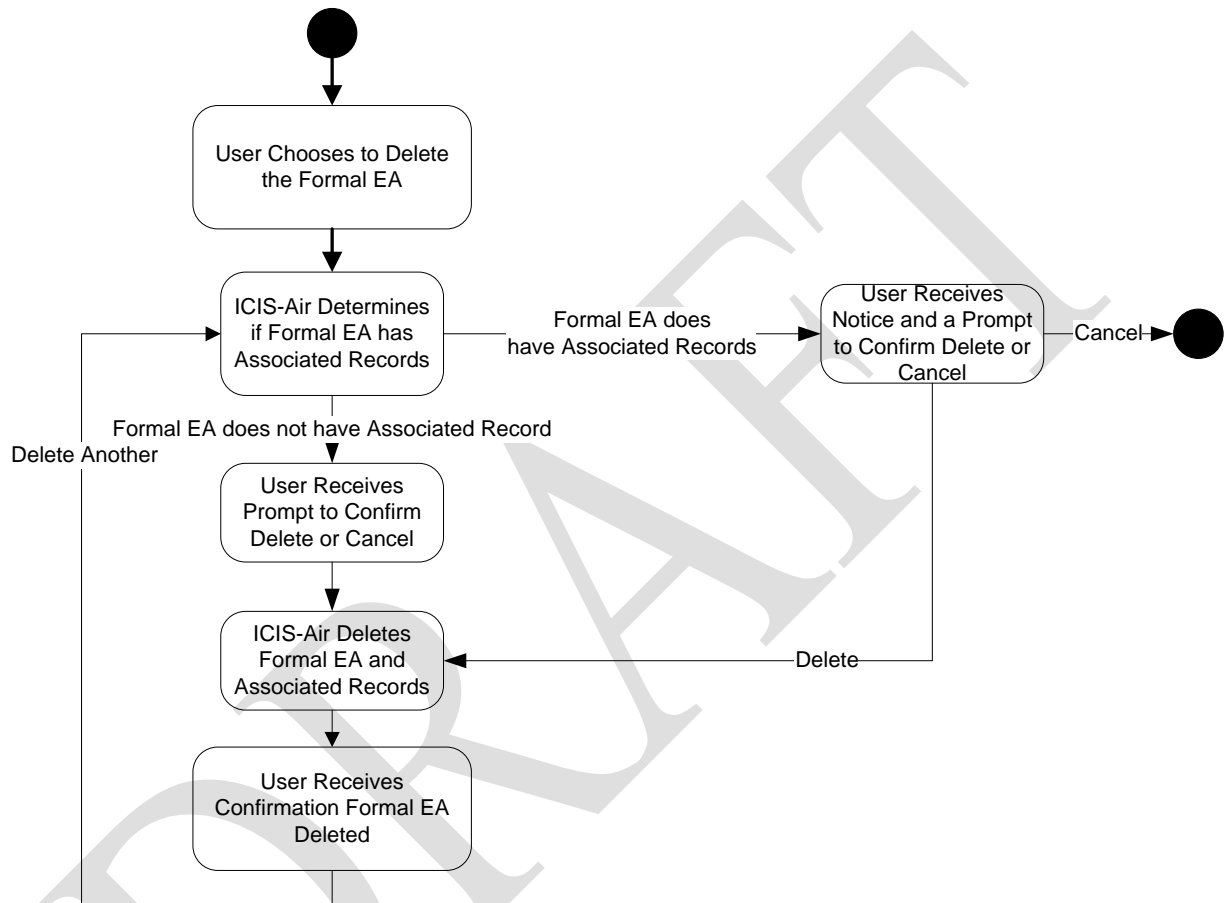
3.3.4   Formal Enforcement Actions (EPA)

A Formal Enforcement Action by EPA may begin with a notice of violation or with the issuance of an Administrative Order (either with or without penalties) to bring about compliance from the respondent. Formal Enforcement Actions also include Judicial Actions, which are formal lawsuits, filed in court, against defendants who have failed to comply with statutory or regulatory requirements or with an Administrative Order.

A Final Order documents the conclusion(s) of an Enforcement Action, including whether the respondent/defendant must comply with any of the following: Penalties, Supplemental Environmental Projects (SEPs), Complying Actions/Injunctive Relief, or Compliance Schedules. A single Enforcement Action can result in zero to many Final Orders.

For EPA, Formal Administrative and Judicial Enforcement Actions have different reporting requirements in ICIS-Federal Enforcement and Compliance (FE&C). The Air requirements for Formal Enforcement Actions will be added to the existing ICIS-FE&C framework.

The requirements, functionality, data elements, and business rules that support the processing of Formal Enforcement Actions are detailed in the following subsections.

3.3.4.1   *Summary of Formal Enforcement Action changes for EPA in ICIS-FE&C*

Some Enforcement Action functionality will be changed to better align the system with the Air Program and users' business needs.

- **Comments**

  In addition to the Public Case Summary for ECHO and sensitive comments, users will be able to enter comments that are discretionarily Enforcement Sensitive.

- **Audit Information**

  In the lower footer of the Formal Enforcement Action screens, users will see who initially entered the enforcement information and when, as well as when it was last updated and by whom.

- **Additional/Updated Air Data**

  EPA Formal Enforcement Actions will have additional data elements added to support the Air program, such as an Air Resolved Date, and will have updates to current functionality such as Pollutant selection (Formal Enforcement Actions only).

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of CAA Formal Enforcement Actions for EPA in ICIS-Air.

3.3.4.2   *Formal Enforcement Action (EPA) Functional Requirements*

Table 3.3-8 lists the requirements that apply to Formal Enforcement Actions for EPA. It includes changes to FE&C functions that are allowed and business rules within a function.

Table 3.3-8. ICIS-Air Formal Enforcement Action (EPA) Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release

1.	5.4.1, 5.4.4, 5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3, 5.32.1	EPA SRS	The system shall display the following additional data elements on the Formal Enforcement Actions screens for EPA Users:
			• Air Program Subparts Violated
			• Air Resolved Date
			• Linked Alleged Violation Files
			  – Facility ID
			  – Facility Name
			  – Unique Identifier
			  – Alleged Violation File Name
			  – Agency
			  – Policy Indicator
			  – Sensitive?
			• Comments
			• Audit Information
			  – Created By
			  – Created On
			  – Last Updated By
			  – Last Updated Date
				ICIS-Air version 1.0

2.	5.10.1, 5.10.4, 5.11.1, 5.11.2, 5.11.3	EPA SRS	The system shall enforce the revised security model for users to view, add, edit, and delete a Formal Enforcement Action. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0
3.	N/A	SME	The system shall allow the user to enter multiple comments for a Formal Enforcement Action record.	ICIS-Air version 1.0

3.3.4.3   Formal Enforcement Action (EPA) Data Requirements

Table 3.3-9 lists the new data element requirements that apply to Formal Enforcement Actions for EPA. This table includes the system, minimum data requirements, and possible future data elements. Note: References to REF tables are place holders and values for the REF tables will be reviewed during the Design phase.

Table 3.3-9. ICIS-Air Formal Enforcement Action (EPA) Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Requirement

1.	N	N	N	N	N/A	Air Resolved Date
						• Date
						  – Batch: Must be valid date in yyyy-mm-dd format
						  – Web: Must be valid date in mm/dd/yyyy format

2.	N	N	N	N	N/A	Subparts Violated • Multiselect • Valid value on subparts code table for the correct Air Program • Must be validated against Ref Table
3.	N	Y	Y	N	N/A	Alleged Violation File Unique Identifier • Foreign Key to AVF • Can have multiple
4.	N	N	N	N	N/A	Comments • Multiple for an Formal Enforcement Action record • Alphanumeric (500) • Free-form text
5.	N	N	N	Y	N/A	Comment Entered On • Date • System generated

ID	Key?	SR	PR	SG	Client Req ID	Requirement
6.	N	N	N	Y	N/A	Comment Entered By • Alphanumeric (50) • System generated

7.	N	N	N	N	N/A	Sensitive Comment
						• Alphanumeric (1)
						• Valid Values:
						   – N
						   – Y (Default)

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.3.4.4 *Formal Enforcement Action (EPA) Business Rule Requirements*

Table 3.3-10 lists the new or modified business rules requirements that apply to Formal Enforcement Actions for EPA. This table includes the business rules for data elements and error handling.

Table 3.3-10. ICIS-Air Formal Enforcement Actions (EPA) Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.10.2	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new Formal Enforcement Action data.	ICIS-Air version 1.0
2.	5.10.2	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all edited Formal Enforcement Action data.	ICIS-Air version 1.0
3.	N/A	The system shall default the Addressing Action Type and Date on the Alleged Violation File with the Formal Enforcement Action Type and Air Status Date if the Formal Enforcement Action is being linked to an Alleged Violation File.	ICIS-Air version 1.0
4.	N/A	The system shall default the Resolving Action Type and Air Resolved Date on the Alleged Violation File with the Formal Enforcement Action Type if the Formal Enforcement Action is being linked to an Alleged Violation File and there are no remaining unresolved Enforcement Actions linked to the Alleged Violation File.	ICIS-Air version 1.0
5.	N/A	Air Resolved Date cannot be a future date.	ICIS-Air version 1.0

3.3.4.5 *Adding, Editing, and Deleting Formal Enforcement Actions (EPA)*

Adding, Editing, Copying, and Deleting Administrative Formal and Judicial Orders for EPA users will remain the same. EPA users will continue have the option to add Federal activities through FE&C, or will be able to add them directly through the ICIS-Air home page.

3.4 ALLEGED VIOLATION FILES

Once the Regulatory Agency has determined there are one or more issues warranting further pursuit, they begin compiling the information together. This Alleged Violation File (AVF) will connect all of the actions that identified or confirmed issues, such an odd Stack Test result, an Excess Emissions Report (EER) showing a very high or lengthy exceedence, a Partial Compliance Evaluation/Full Compliance Evaluation (PCE/FCE) finding; any actions taken to notify the facility, such as phone calls or Notices of Violation; and any addressing and resolving actions, such as Formal Enforcement Actions or closeout memos.

At the time of writing, EPA and its partners are overhauling the current High Priority Violation (HPV) and Federally Reportable Violation (FRV) policies. This policy update is projected to be

completed by January 2013, at which point the requirements for this module will be re-evaluated to ensure they support the finalized policy.

The requirements, functionality, data elements, and business rules that support the processing of Alleged Violation Files are detailed in the following subsections.

3.4.1 Summary of Alleged Violation Files in ICIS-Air

Some Alleged Violation Files functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Compliance Status is replaced with the Alleged Violation File**

  Alleged Violation File (AVF) replaces the requirement to track compliance scenarios at the air program pollutant level.

- **Day Zero Action renamed to Alleged Violation File**

  The Day Zero action is reported in order to utilize the ability to link characteristics of and activities related to a federally-reportable violation or a High Priority Violation. For example, AFS documents the violation type and pollutants involved in an HPV in addition to subsequent informal and formal enforcement actions. The AVF serves as the parent record of an alleged violation. The relevant air programs, air pollutants and status as a HPV will be attributes of the AVF.

- **System-required entry of violation types for AVFs**

  Legacy AFS had fields for entering violation types when a non-HPV or HPV Day Zero action was entered, but the fields were not system-required.   In ICIS-Air, users will be system-required to enter at least one violation type on all AVFs. The list of violation types will be modified based on the HPV criteria. The system will maintain a reference table that indicates whether a violation type is HPV, considering the size of the facility. The system will use the violation type and facility classification to roll up an overall policy indicator based on the worst of the associated violation types. The user will be able to manually override this system-generated indicator. ,

- **Addition of optional, non-MDR data elements such as AVF name, determination date, to assist users in data management**

  ICIS-Air will provide new, optional, non-MDR data elements to assist the user in data management. One of these fields is an AVF name to allow users to give records "nicknames" to assist in identifying records.

- **Splitting of addressing/resolving actions between activities and attributes**

  Some actions will now be attributes of the AVF file rather than a separate, linked record (e.g., No Further Action). Conversely, some actions will be combined into attributes of a single record. For example, rather than entering two separate actions for Enforcement Action, addressing and resolution, ICIS-Air will track a single Enforcement Action with an initiation and resolution date.

- **Simplification of pollutants**
  - Removal of the "FACIL" pollutant; to be replaced with a value such as "No specific pollutants" for violations such as recordkeeping issues
  - No compliance status tracked at pollutant, AVF, or Facility level
  - No longer required (or able) to link pollutants and programs

- **Pollutants and Programs not limited to those on the Facility record**
  - Visual indicators will be used to differentiate when adding and viewing AVF attributes on screen. The indicator will highlight if the attribute is not on the Facility record. The system will not require the attribute be added to the Facility record.
- **There will be a flag at the facility level indicating the "highest" status of non-resolved HPV. Notional values:**
  - Unaddressed HPV
  - Unaddressed FRV
  - Unresolved HPV
  - Unresolved FRV
  - Blank (all AVFs are resolved or no AVFs exist for facility).
- **Streamlined AVF/Compliance Determination for EPA Users**

  The AVF screen for EPA HQ and Regional Users will include fields for the required and optional FE&C Compliance Determination to alleviate the need for EPA users to enter both an Alleged Violation File and Compliance Determination containing duplicative information.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the processing of Alleged Violation Files in ICIS-Air.

3.4.2   Alleged Violation File Functional Requirements

Table 3.4-1 lists the requirements that apply to Alleged Violation Files. It includes functions that are allowed and business rules within a function.

Table 3.4-1. ICIS-Air Alleged Violation File Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	N/A		The system shall allow the user to view Alleged Violation File data.	ICIS-Air version 1.0
2.	N/A		The system shall allow the user to add a new Alleged Violation File record.	ICIS-Air version 1.0
3.	N/A		The system shall allow the user to edit existing Alleged Violation File data.	ICIS-Air version 1.0
4.	N/A		The system shall allow the user to delete an existing Alleged Violation File record.	ICIS-Air version 1.0
5.	N/A		The system shall allow the user to access the Add Alleged Violation File screen from the home page.	ICIS-Air version 1.0
6.	N/A		The system shall allow the user to access the Add Alleged Violation File screen from within a facility.	ICIS-Air version 1.0
7.	5.11.1, 5.11.2, 5.11.3, 5.15.1, 5.15.2, 5.32.3, 5.32.4	EPA SRS, SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall display the following data elements on the Alleged Violation File screen for Delegated Agency Users: • Facility ID • Facility Name • Unique Identifier • Alleged Violation File Name • Status • Status Date • Agency	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Agency Date • Policy Indicator • EPA Policy Indicator Comment • Enforcement Sensitive Indicator • Alleged Violation Determination Date • Applicable Air Program(s) • Applicable Pollutant(s) • Alleged Violation Type • Alleged Violation Type Start Date • Alleged Violation Type End Date • Alleged Violation Type HPV/FRV/Non-FRV status • Discovery Date • Discovery Action • Addressing Action • Addressing Date • Resolution Action • Resolution Date • National Initiatives • Comments • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6	

8.	5.11.1, 5.11.2, 5.11.3, 5.32.1, 5.32.2, 5.32.3, 5.32.4	EPA SRS SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall display the following data elements on the Alleged Violation File screen for EPA Users:
			• Facility ID
			• Facility Name
			• Unique Identifier
			• Status
			• Status Date
			• Agency
			• Agency Date
			• Policy Indicator
			• EPA Policy Indicator Comment
			• Enforcement Sensitive Indicator
			• Compliance Determination
			   – Compliance Determination Name
			   – Compliance Determination Type
			   – Region
			   – Status Type
			• Federal Statutes Violated
			• Law Sections Violated
			• Programs
			• Applicable Pollutant(s)
			• Alleged Violation Type
			• Alleged Violation Type Start Date
			• Alleged Violation Type End Date
			• Alleged Violation Type HPV/FRV/Non-FRV status
			• Discovery Date
			• Discovery Action
			• Addressing Action
			• Addressing Date
			• Resolution Action
			• Resolution Date
				ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

			• National Initiatives
			• National Initiative Determination
			   – Facility NEI Initiated Action Type
			   – Facility NEI Initiated Action Date
			   – Facility NEI Addressed/Controlled Action Type
			   – Facility Addressed/Controlled Action Date
			   – Facility No Further Action Type
			   – Facility No Further Action Date
			   – HQ Addressed/Controlled Approval
			   – HQ Addressed/Controlled Approval Date
			   – NEI Determination Comment
			• Comments
			• User Defined Field 1
			• User Defined Field 2
			• User Defined Field 3
			• User Defined Field 4
			• User Defined Field 5
			• User Defined Field 6	

9.	N/A		The system shall enforce the security model for the users to view, add, edit, and delete an Alleged Violation File. Refer to the ICIS-Air Security Requirements.	ICIS-Air version 1.0
10.	5.11.4	EPA SRS	The system shall allow the user to indicate a compliance monitoring activity that found an Alleged Violation File(s) as the Discovery Action.	ICIS-Air version 1.0
11.	5.1.5, 5.2.6	EPA SRS	The system shall allow the user to search for Alleged Violation Files based on: Facility Information • Facility Name • Facility ID • FRS ID • Registration Number • Region • State • LCON • Government Ownership • Federal Facility Ownership • Address • City • County • Zip Code • Tribal Land Code Alleged Violation File Information • Alleged Violation File Identifier • Alleged Violation File Name • Air Programs • Pollutants • Agency • Policy Indicator • Alleged Violation File Type • Alleged Violation Determination Date Range Milestones • Discovery Action Type • Discovery Action Date Range • No Discovery Action Identified • Notice of Violation Action Type • Notice of Violation Date Range	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• No Notification of Violation Date • Addressing Action Type • Addressed Date Range • Not Yet Addressed • Resolving Action Type • Resolved Date Range • Not Yet Resolved User Defined Fields • User Defined Field 1 • User Defined Field 2 • User Defined Field 3 • User Defined Field 4 • User Defined Field 5 • User Defined Field 6	
12.	N/A	N/A	The system shall provide the user a list of search results that matches the search criteria entered for Alleged Violation Files.	ICIS-Air version 1.0
13.	5.9.11	EPA SRS	The system shall allow the user to link Alleged Violation Files to Compliance Monitoring Activities.	ICIS-Air version 1.0
14.	5.9.11	EPA SRS	The system shall allow the user to unlink Alleged Violation Files from Compliance Monitoring Activities.	ICIS-Air version 1.0
15.	5.9.11	EPA SRS	The system shall allow the user to link Alleged Violation Files to Enforcement Actions.	ICIS-Air version 1.0
16.	5.9.11	EPA SRS	The system shall allow the user to unlink Alleged Violation Files from Enforcement Actions.	ICIS-Air version 1.0
17.	5.11.6, 5.11.8	EPA SRS	The system shall categorize the following activities as addressing actions when linked to Alleged Violation Files: • Administrative Orders • Administrative Penalty Orders • Civil Referrals • Consent Decrees	ICIS-Air version 1.0
18.	5.11.7, 5.11.8	EPA SRS	The system shall categorize the following activities as resolving actions when linked to or entered on Alleged Violation Files: • Closeout Memo • Entry of Air Resolution Date • Case Dropped • Source Returned to Compliance	ICIS-Air version 1.0
19.	5.11.8	EPA SRS	The system shall treat resolving actions as addressing actions if the addressing action date is blank when the resolving action is entered.	ICIS-Air version 1.0
20.	N/A	SME	The system shall allow the user to enter multiple comments for an Alleged Violation File record.	ICIS-Air version 1.0
21.	N/A	SME	The System shall track the history of Agency changes on the Alleged Violation File.	ICIS-Air version 1.0

3.4.3 Alleged Violation File Data Requirements

Table 3.4-2 lists the data element requirements that apply to Alleged Violation Files. This table includes the system, minimum data requirements, and possible future data elements. Note: References to REF tables are place holders and values for the REF tables will be reviewed during the Design phase.

Table 3.4-2. ICIS-Air Alleged Violation File Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement
1.	Y	Y	Y	N	5.9.11	Both	Facility ID • Foreign Key of Linked Facility
2.	Y	Y	Y	N		Both	Unique Identifier • User Defined or System Generated • Alphanumeric (15)
3.	N	N	N	N		Both	Alleged Violation File Name Alphanumeric (100) Free-form text
4.	N	N	N	N		Both	Federal Statutes Violated: • Pick list • Must be validated against REF table • Can be multiple for Federal users entering Federal records • Defaults to CAA (for Delegated Agency users, or Federal users entering Delegated Agency records)
5.	N	N	N	N		Federal	Law Sections Violated: • Multiselect • Dynamically populated based on Federal Statutes selected • Must be validated against REF_LAW_SECTION table
6.	N	Y	Y	N		Both	Applicable Air Programs • Multiselect • Dynamically populated based on Federal Law Sections (Federal) • Defaults to Clean Air Act programs (for Delegated Agency users, or Federal users entering Delegated Agency records) • Must be validated against REF_PROGRAM table
7.	N	N	Y	N		Both	Applicable Air Pollutants • Multiselect • Must be validated against REF_POLLUTANT table for Air Pollutants
8.	N	N	N	N	Comment Adjudication 8/10/2012	Delegated Agency	Other Air Program Description • Alphanumeric (50) Free-form text
9.	N	N	N	N		Both	National Initiatives • Multiselect • Must be validated against REF_PRIORITY table
10.	N	N	N	Y		Both	Status • Valid Values: – Unaddressed – Noticed – Addressed – Resolved • Determined by most recent Milestone Activity
11.	N	N	N	Y		Both	Status Date • Date • Determined by most recent Milestone Activity

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement

12.	N	Y	Y	N	5.9.11	Both	Agency
							• Valid Values:
							  – U.S. EPA
							  – State
							  – Tribe
							  – Local Government
							  – State Contractor
							  – EPA Contractor
							  – EPA Grantee (not State)

13.	N	N	N	N		Both	Agency Date
							• Date
							  – Batch: Must be valid date in yyyy-mm-dd format
							  – Web: Must be valid date in mm/dd/yyyy format

14.	N	N	N	N		Both	Policy Indicator
							• Valid Values:
							  – HPV
							  – FRV
							  – Non-FRV
							• Determined by most severe violation type
							• Can be overridden by user

15.	N	N	N	Y		Both	Policy Indicator Date • Date • Auto-generated based on date of change on the Policy Indicator field.
16.	N	N	N	N		Both	EPA Policy Indicator Comment • Alphanumeric (500) • Free-form text

17.	N	N	N	N		Both	Enforcement Sensitive Indicator
							• Alphanumeric (1)
							• Valid Values:
							  – N
							  – Y (Default)

18.	N	N	N	N		Both	Alleged Violation File Determination Date
							• Date
							  – Batch: Must be valid date in yyyy-mm-dd format
							  – Web: Must be valid date in mm/dd/yyyy format
							• System generated default with user override option

19.	N	Y	N	N		Federal	Compliance Determination Name • Alphanumeric (100) • Free-form text
20.	N	Y	N	N		Federal	Compliance Determination Type • Must be validated against REF table
21.	N	Y	N	N		Federal	Region • Must be validated against REF table
22.	N	Y	N	N		Federal	Compliance Determination Status Type • Must be validated against REF table
23.	N	N	N	N		Both	Alleged Violation File Type • Must be validated against REF table
24.	N	N	N	N		Both	Alleged Violation File Start Date • Date – Batch: Must be valid date in yyyy-mm-

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement
							dd format – Web: Must be valid date in mm/dd/yyyy format
25.	N	N	N	N		Both	Alleged Violation File End Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
26.	N	N	N	Y		Both	Discovery Action Type • Auto-generated based on Linked Discovery Action
27.	N	N	N	Y		Both	Discovery Action Date • Date • Auto-generated based on Linked Discovery Action
28.	N	N	N	Y		Both	Notification Action Type • Auto-generated based on Linked Discovery Action
29.	N	N	N	Y		Both	Notification Action Date • Date • Auto-generated based on Linked Discovery Action
30.	N	N	N	Y		Both	Addressing Action Type • Auto-generated based on Linked Discovery Action
31.	N	N	N	Y		Both	Addressing Action Date • Date • Auto-generated based on Linked Discovery Action
32.	N	N	N	Y		Both	Resolving Action Type • Auto-generated based on Linked Discovery Action
33.	N	N	N	Y		Both	Resolving Action Date • Date • Auto-generated based on Linked Discovery Action
34.	N	N	N	N		Both	Non-Enforcement Resolution Type • Must be validated against REF Table
35.	N	N	N	N		Both	Non-Enforcement Resolution Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
36.	N	N	N	N		Federal	Facility NEI Initiated Action Type • Multiselect • Must be validated against REF table
37.	N	N	N	N		Federal	Facility NEI Initiated Action Date • Date – Batch: Must be valid date in yyyy-mm-dd format – Web: Must be valid date in mm/dd/yyyy format
38.	N	N	N	N		Federal	Facility NEI Addressed/Controlled Action Type • Multiselect

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement
							• Must be validated against REF table

39.	N	N	N	N		Federal	Facility Addressed/Controlled Action Date
							• Date
							  − Batch: Must be valid date in yyyy-mm-dd format
							  − Web: Must be valid date in mm/dd/yyyy format

40.	N	N	N	N		Federal	Facility No Further Action Type • Multiselect • Must be validated against REF table

41.	N	N	N	N		Federal	Facility No Further Action Date
							• Date
							  − Batch: Must be valid date in yyyy-mm-dd format
							  − Web: Must be valid date in mm/dd/yyyy format

42.	N	N	N	N		Federal	HQ Addressed/Controlled Approval
							• Alphanumeric (1)
							• Valid Values:
							  − N (Default)
							  − Y

43.	N	N	N	N		Federal	HQ Addressed/Controlled Date
							• Date
							  − Batch: Must be valid date in yyyy-mm-dd format
							  − Web: Must be valid date in mm/dd/yyyy format

44.	N	N	N	N		Federal	NEI Determination Comments • Alphanumeric (500) • Free-form text
45.	N	N	N	N		Both	Comments • Multiple for an AVF record • Alphanumeric (500) • Free-form text
46.	N	N	N	Y		Both	Comment Entered On • Date • System generated
47.	N	N	N	Y		Both	Comment Entered By • Alphanumeric (50) • System generated

48.	N	N	N	N		Both	Sensitive Comment
							• Alphanumeric (1)
							• Valid Values:
							  − N
							  − Y (Default)

49.	N	N	N	N	Critical Requirements Review Comment Adjudication Meeting 08/10/2012	Both	User Defined Field Enforcement Sensitive Flag
							• Alphanumeric (1)
							• Valid Values:
							  − Y (default)
							  − N

50.	N	N	N	N		Both	User Defined Field 1 • Alphanumeric (1) • Valid Values: − N (Default)

ID	Key?	SR	PR	SG	Client Req ID	Federal or Delegated Agency	Requirement
							– Y
51.	N	N	N	N		Both	User Defined Field 2 • Alphanumeric (100) • Free-form text
52.	N	N	N	N		Both	User Defined Field 3 • Alphanumeric (100) • Free-form text

53.	N	N	N	N		Both	User Defined Field 4
							• Date
							  – Batch: Must be valid date in yyyy-mm-dd format
							  – Web: Must be valid date in mm/dd/yyyy format

54.	N	N	N	N		Both	User Defined Field 5
							• Date
							  – Batch: Must be valid date in yyyy-mm-dd format
							  – Web: Must be valid date in mm/dd/yyyy format

55.	N	N	N	N		Both	User Defined Field 6 • Alphanumeric (500) • Free-form text
56.	N	N	N	Y			Created By • System Generated based upon User ID
57.	N	N	N	Y			Created Date • System Generated • Date
58.	N	N	N	Y			Last Modified By • System Generated based upon User ID
59.	N	N	N	Y			Last Modified Date • System Generated • Date

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.4.4 Alleged Violation File Business Rule Requirements

Table 3.4-3 lists the business rules requirements that apply to Alleged Violation Files. This table includes the business rules for data elements and error handling.

Table 3.4-3. ICIS-Air Alleged Violation Files Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	5.11.11	The system shall not allow a Notification Date to be less than Discovery Date.	ICIS-Air version 1.0
2.	N/A	The system shall not allow a FCE, PCE, Information Request, Stack Test or EER Discovery Action with no Actual End Date to be linked to an Alleged Violation File.	ICIS-Air version 1.0
3.	N/A	The system shall allow an Investigation Discovery Action with an Actual Start Date with no Actual End Date to be linked to an Alleged Violation File.	ICIS-Air version 1.0
4.	5.11.11	The system shall not allow an Addressing Date to be less than the Discovery Date.	ICIS-Air version 1.0
5.	5.11.11	The system shall not allow the Resolution Date to be less than the Addressing Date.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
6.	5.12.4	The system shall highlight Pollutants in the Applicable Pollutants list that are not associated with the parent Facility record.	ICIS-Air version 1.0
7.	N/A	The system shall highlight Programs in the Applicable Air Programs list that are not associated with the parent Facility record..	ICIS-Air version 1.0
8.	N/A	The system shall default the Enforcement Sensitive Indicator to Sensitive.	ICIS-Air version 1.0
9.	N/A	The system shall change the Enforcement Sensitive Indicator to Not Sensitive if a public action is linked to the AVF or the user manually changes the field.	ICIS-Air version 1.0
10.	N/A	The system shall allow the user to change the Enforcement Sensitive Indicator.	ICIS-Air version 1.0
11.	N/A	The system shall treat all comments as Enforcement Sensitive if the AVF is Enforcement Sensitive.	ICIS-Air version 1.0
12.	N/A	The system shall enforce Enforcement Sensitive status of individual comments if the AVF is Not Sensitive	ICIS-Air version 1.0
13.	N/A	The system shall display the Key Milestone Action Type and Date to all users on the AVF Basic Info display.	ICIS-Air version 1.0
14.	N/A	The system shall enforce the display of Enforcement Sensitive Status of Linked Activities on the Linked Activities list.	ICIS-Air version 1.0
15.	N/A	The system shall not allow a non-EPA user to enter EPA Policy Indicator Comments.	ICIS-Air version 1.0
16.	5.11.10	The system shall default the HPV/FRV/Non-FRV status of each Alleged Violation Type for the Facility Default Classification.	ICIS-Air version 1.0
17.	N/A	The system shall default the AVF Policy Indicator to the most severe of the Alleged Violation Type HPV/FRV/Non-FRV status.	ICIS-Air version 1.0
18.	N/A	The system shall allow the user to override the default Policy Indicator Status.	ICIS-Air version 1.0
19.	5.11.10	The system shall have an algorithm to calculate which is the Discovery Action if multiple Discovery Actions are linked to an Alleged Violation File.	ICIS-Air version 1.0
20.	5.11.10	The system shall have an algorithm to calculate which is the Notification Action if multiple Notification Actions are linked to an Alleged Violation File.	ICIS-Air version 1.0
21.	5.11.10	The system shall have an algorithm to calculate which is the Addressing Action if multiple Addressing Actions are linked to an Alleged Violation File.	ICIS-Air version 1.0
22.	5.11.10	The system shall have an algorithm to calculate which is the Resolving Action if multiple Resolving Actions are linked to an Alleged Violation File.	ICIS-Air version 1.0
23.	5.11.4	The system shall allow the user to override the default Discovery Action by manually identifying a different Discovery Action.	ICIS-Air version 1.0
24.	N/A	The system shall allow the user to override the default Notification Action by manually identifying a different Notification Action.	ICIS-Air version 1.0
25.	N/A	The system shall allow the user to override the default Addressing Action by manually identifying a different Addressing Action.	ICIS-Air version 1.0
26.	N/A	The system shall allow the user to override the default Resolution Action by either manually identifying a new Resolution Action or by entering a Non-Enforcement Resolution.	ICIS-Air version 1.0
27.	N/A	The system shall not allow the linking of a new action that meets Resolving Action criteria to automatically override a Non-Enforcement Resolution.	ICIS-Air version 1.0
28.	N/A	The system shall ensure that the Alleged Violation File is associated to an existing Facility ID.	ICIS-Air version 1.0

ID	Client Req ID	Requirement	Planned Release
29.	N/A	The system shall ensure that an Alleged Violation File is associated to only one Facility.	ICIS-Air version 1.0
30.	N/A	The system shall ensure that an Enforcement Action eligible to be related must already exist in the system and be linked to the same Facility as the Alleged Violation File.	ICIS-Air version 1.0
31.	N/A	The system shall ensure that a Compliance Monitoring Activity eligible to be related must already exist in the system and be linked to the same Facility as the Alleged Violation File.	ICIS-Air version 1.0
32.	N/A	The system shall update the audit table with the user name of who created the record and the date of when the record was created for all new AVF data.	ICIS-Air version 1.0
33.	N/A	The system shall update the audit table with the user name of who modified the record and the date of when the record was modified for all edited AVF data.	ICIS-Air version 1.0
34.	Comment Adjudication meeting 8/24/2012	When an Air Program 'Other' is selected, Air Program Other Description must be populated.	ICIS-Air version 1.0
35.	Comment Adjudication meeting 8/24/2012	When an Air Program 'Other' is selected, a Federal Air Program must also be selected.	ICIS-Air version 1.0

3.4.5 Add Alleged Violation File

Users may enter an Alleged Violation File only against an existing Facility. Users must have the Add Alleged Violation File privileges to add a new Alleged Violation File.

An Alleged Violation File is uniquely identified by the following key data elements:

- Unique Identifier

The following data elements are required to add a new Alleged Violation File in ICIS-Air:

- Facility ID
- Applicable Air Programs
- Applicable Pollutants
- Alleged Violation Type (at least one).

Batch

Batch users will have an Add Alleged Violation File transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.4.3, Alleged Violation File Data Elements, and Section 3.4.4, Alleged Violation File Business Rules, for more details.

Figure 3.4-1 illustrates the processing required for adding an Alleged Violation File to ICIS-Air through a batch transaction.

Figure 3.4-1. Use Case: Add Alleged Violation File—Batch
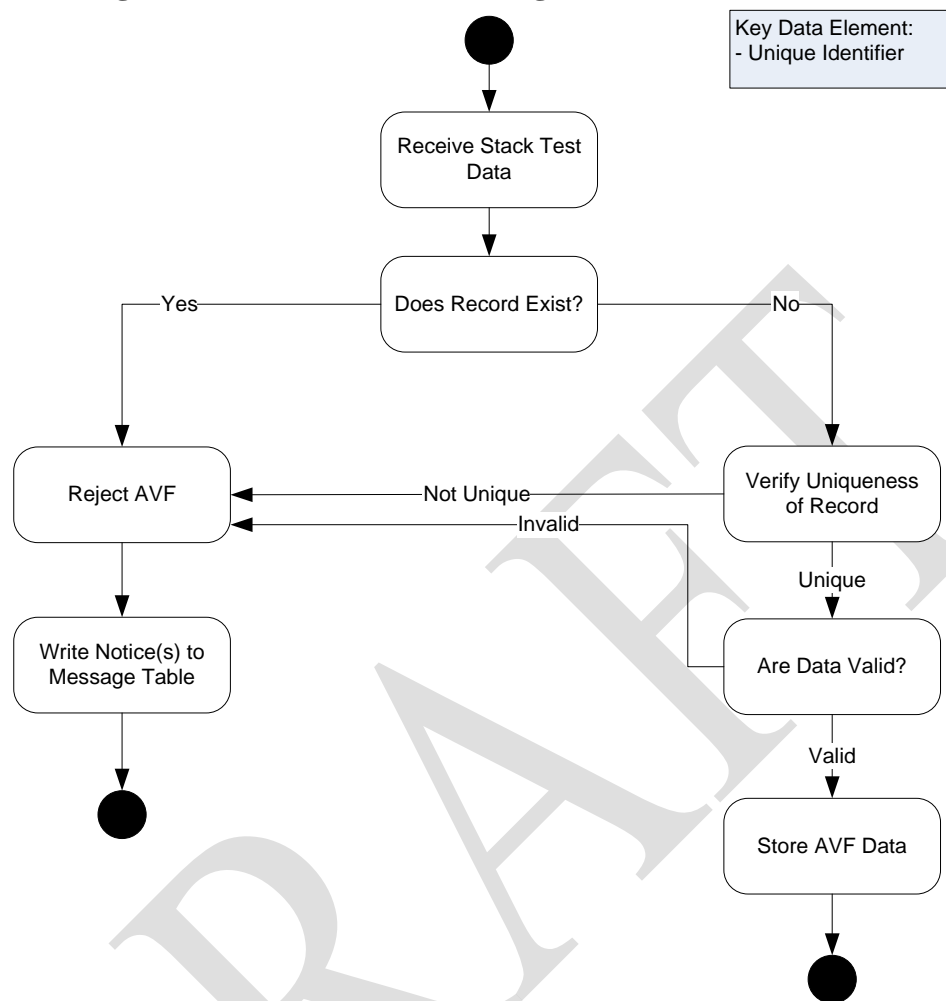
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.4.3, Alleged Violation File Data Requirements, and Section 3.4.4, Alleged Violation File Business Rule Requirements, for more details.

Figure 3.4-2 illustrates the processing required for adding an Alleged Violation File in ICIS-Air online.

Figure 3.4-2. Use Case: Add Alleged Violation File—Web
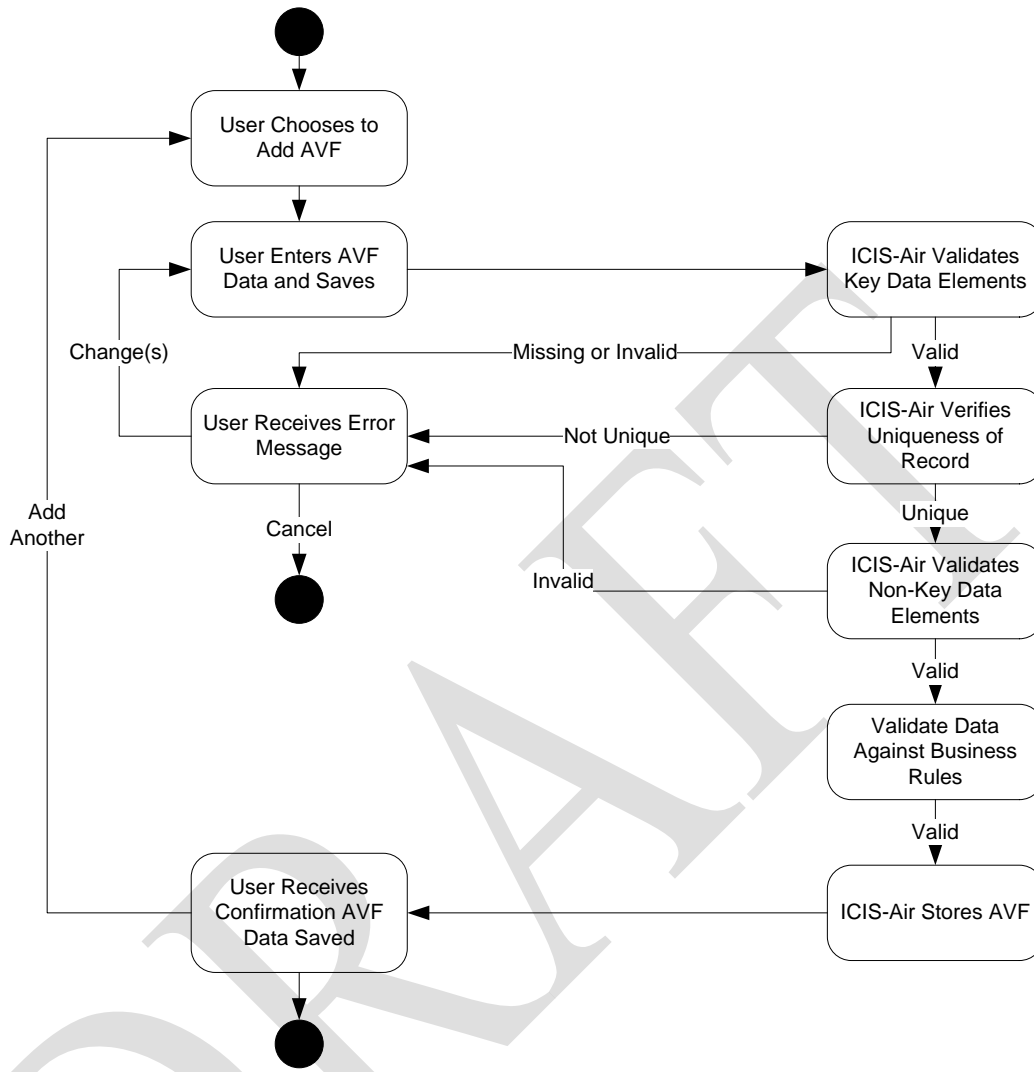
Figure 3.4-3 shows the notional Add Alleged Violation File screen for Delegated Agencies. Figure 3.4-4 shows the notional Add Alleged Violation Files screen for EPA Users. Note: Each figure is one continuous screen but broken into multiple parts for legibility.

Figure 3.4-3. Notional Screen: Add Alleged Violation File (Delegated Agency)

Key Linked Activities   Add/Change Linked Activities

	Via Linked Activity	Non-Enforcement Resolution		
Discovery Action Type and Date:			Select Type ▼	Add New
Notification Action Type and Date:			Select Type ▼	Add New
Addressing Action Type and Date:			Select Type ▼	Add New
Resolved Action Type and Date:		▼ 📅	Select Type ▼	Add New

Comments   Manage Comments

Entered On	Entered By	Comments	Sensitive?

User Defined Fields   **Sensitive:** ☑

1: ☐

2: [_____]   3: [_____]

4: [____] 📅   5: [____] 📅

6: [_____]

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A   Save & Exit   Save & Continue   Save & Add Another   Save & Add Linked Activity   Select Type ▼   Cancel

Figure 3.4-4. Notional Screen: Add Alleged Violation File (EPA)

Key Linked Activities — Add/Change Linked Activities

	Via Linked Activity	Non-Enforcement Resolution		
Discovery Action Type and Date:			Select Type ▼	Add New
Notification Action Type and Date:			Select Type ▼	Add New
Addressing Action Type and Date:			Select Type ▼	Add New
Resolved Action Type and Date:	▼	📅	Select Type ▼	Add New

*Alleged Violation Types — Manage Violation Types

Alleged Violation Type	Start Date	End Date	HPV/FRV/Non-FRV

National Enforcement Initiative Determination

Facility NEI Initiated Action Type: [Select Types]   Facility NEI Initiated Action Date: 📅

Facility NEI Addressed/Controlled Action Type: [Select Types]   Facility Addressed/Controlled Action Date: 📅

Facility No Further Action Type: [Select Types]   Facility No Further Action Date: 📅

HQ Addressed/Controlled Approval: ☐   NEI Determination Comment:

HQ Addressed/Controlled Approval Date: 📅

Comments — Manage Comments

Entered On	Entered By	Comments	Sensitive?

User Defined Fields   Sensitive: ☑

1: ☐
2: [   ]   3: [   ]
4: [   ] 📅   5: [   ] 📅
6: [   ]

Created By: N/A Created Date: N/A
Last Modified By: N/A Last Modified Date: N/A

[Save & Exit] [Save & Continue] [Save & Add Another] [Save & Add Linked Activity] Select Type ▼ [Cancel]

3.4.6 Edit Alleged Violation File

Users can edit an Alleged Violation File within the current view of the Alleged Violation File record. A user will also have the ability to link the Alleged Violation File to Compliance Monitoring activities and Enforcement Actions.

The following data elements are key data elements that uniquely identify an Alleged Violation File record and cannot be edited through the Edit Alleged Violation File transaction:

- Facility ID
- Unique Identifier

The following data elements are system generated or cannot be modified after the initial Alleged Violation File record was created and cannot be edited through the Edit Alleged Violation File transaction:

- Status[7]
- Status Date[8]
- Policy Indicator Date
- Alleged Violation Type HPV/FRV/Non-FRV

Batch

Batch users will have an Edit Alleged Violation File transaction rejected when system-required data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See the data elements in Section 3.4.3 and business rules in Section 3.4.4 for more details on rejecting Alleged Violation File edit transactions.

Figure 3.4-5 illustrates the processing required for editing an Alleged Violation File in ICIS-Air through a batch transaction.

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[7] Status is the "bubble up" of the most recent milestone
[8] Status Date is the date of the most recent milestone activity

Figure 3.4-5. Use Case: Edit Alleged Violation File—Batch
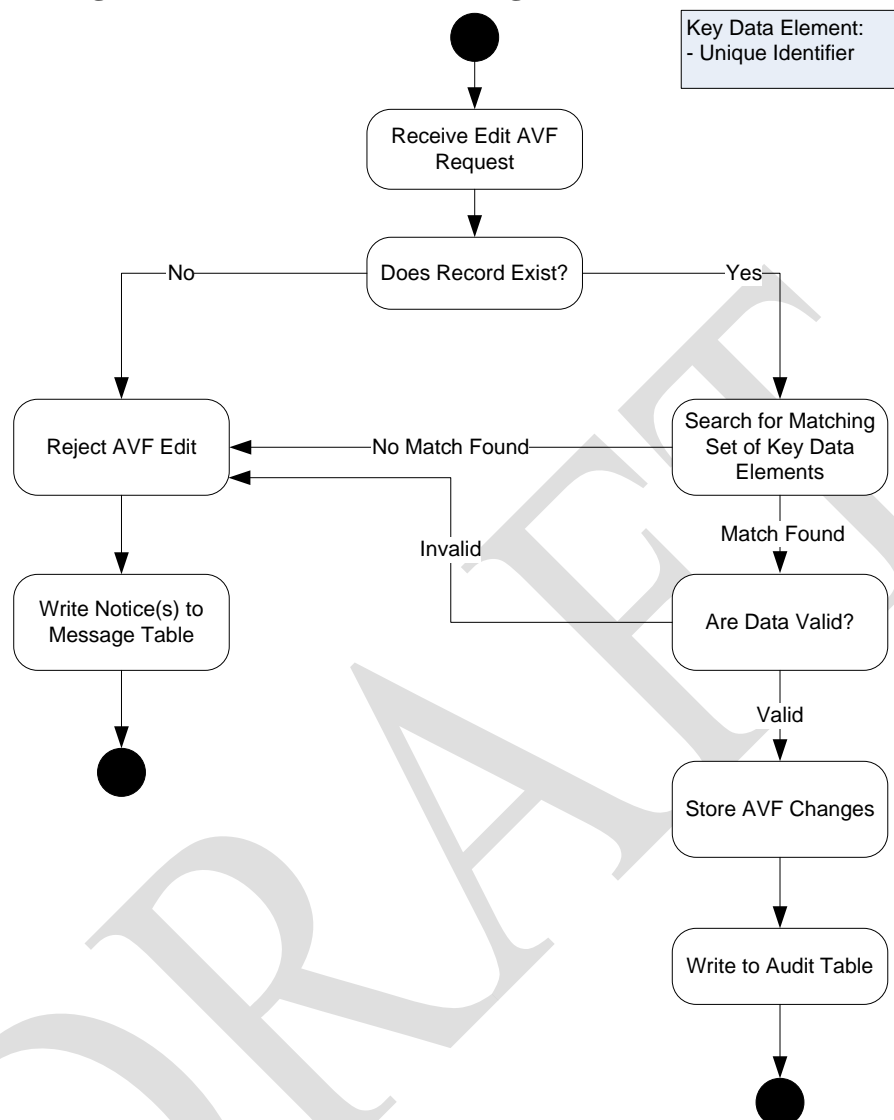
Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.4.3, Alleged Violation File Data Requirements, and Section 3.4.4, Alleged Violation File Business Rule Requirements, for more details.

Users may edit an Alleged Violation File by accessing the List Alleged Violation Files screen, selecting the Unique Identifier link for that Alleged Violation File. ICIS-Air will display the Edit Alleged Violation File screen for the selected Alleged Violation File.

Figure 3.4-6 illustrates the processing required for editing an Alleged Violation File in ICIS-Air online.

Figure 3.4-6. Use Case: Edit Alleged Violation File—Web
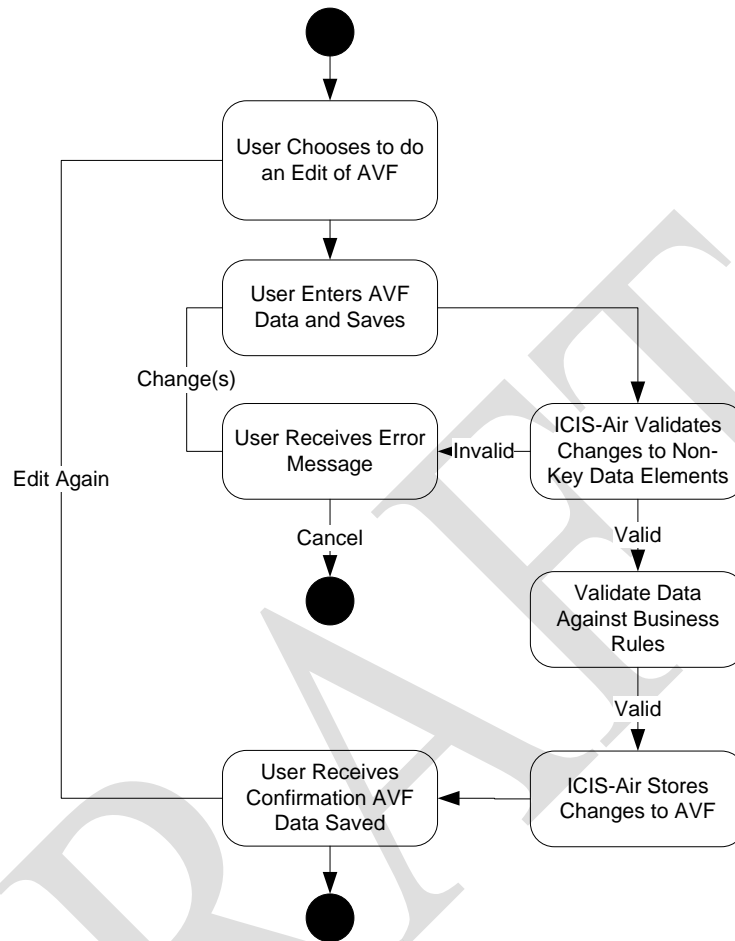
Users must have the Edit Alleged Violation File role to edit an existing Alleged Violation File.

Figure 3.4-7 shows the notional Edit Alleged Violation File screen. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.4-7. Notional Screen: Edit Alleged Violation File (Delegated Agency)

Users will have the ability to link and unlink the current Alleged Violation File record to related Compliance Monitoring and Enforcement Action activities. Once users have linked the Alleged Violation File to other activities, they can view a list of related Compliance Monitoring activities that have already been linked and identify Discovery, Notification, Addressing and Resolving Actions. The Related Activities screen will be blank for new Alleged Violation File records. Figure 3.4-8 shows the related activities that have been linked to the current Alleged Violation File.

Figure 3.4-8. Notional Screen: Related Activities

Users can click on the List More Eligible to Link button from the Related Activities screen to list additional activities. Figure 3.4-9 shows the notional list of activities eligible to be linked to the AVF.

Figure 3.4-9. Notional Screen: List of Activities Eligible to be Linked

3.4.7 Delete Alleged Violation File

When users delete an Alleged Violation File, the AVF and all child records for that Compliance Monitoring activity will be deleted. The child records include:

- Links to FCEs/PCEs/Investigations/Information Requests
- Links to Links to TVACCs
- Links to Stack Tests
- Links to CEM/EERs
- Links to Enforcement Actions

Batch

Batch users will have Delete Alleged Violation File transactions rejected if the record does not exist or the business rules are violated.

Figure 3.4-10 illustrates the processing required for deleting an Alleged Violation File from ICIS-Air through a batch transaction.

Figure 3.4-10. Use Case: Delete Alleged Violation Files—Batch
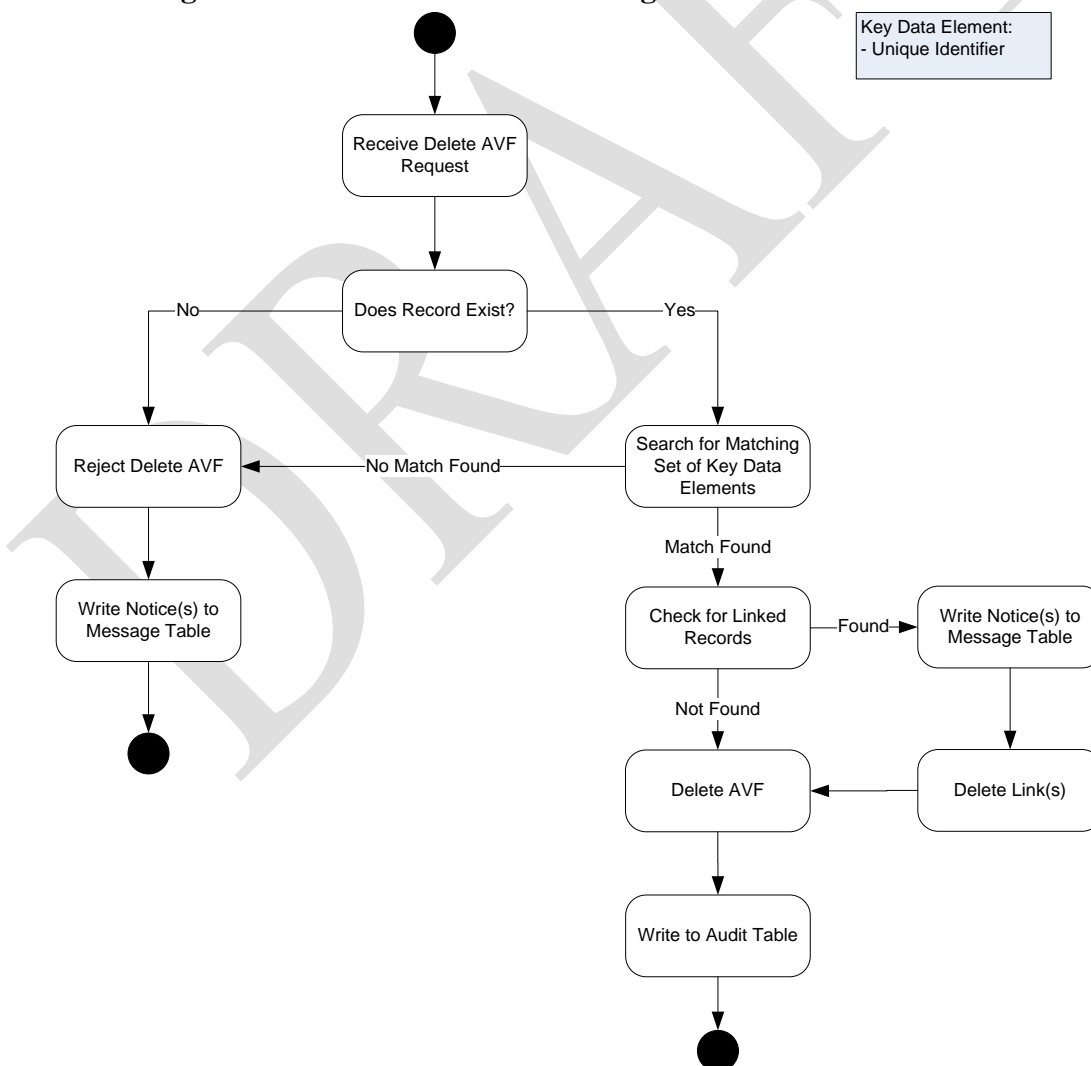
Web

Web users will receive an error message if the record does not exist or the business rules are violated.

Figure 3.4-11 illustrates the processing required for deleting an Alleged Violation File from ICIS-Air online.

Figure 3.4-11. Use Case: Delete Alleged Violation Files—Web
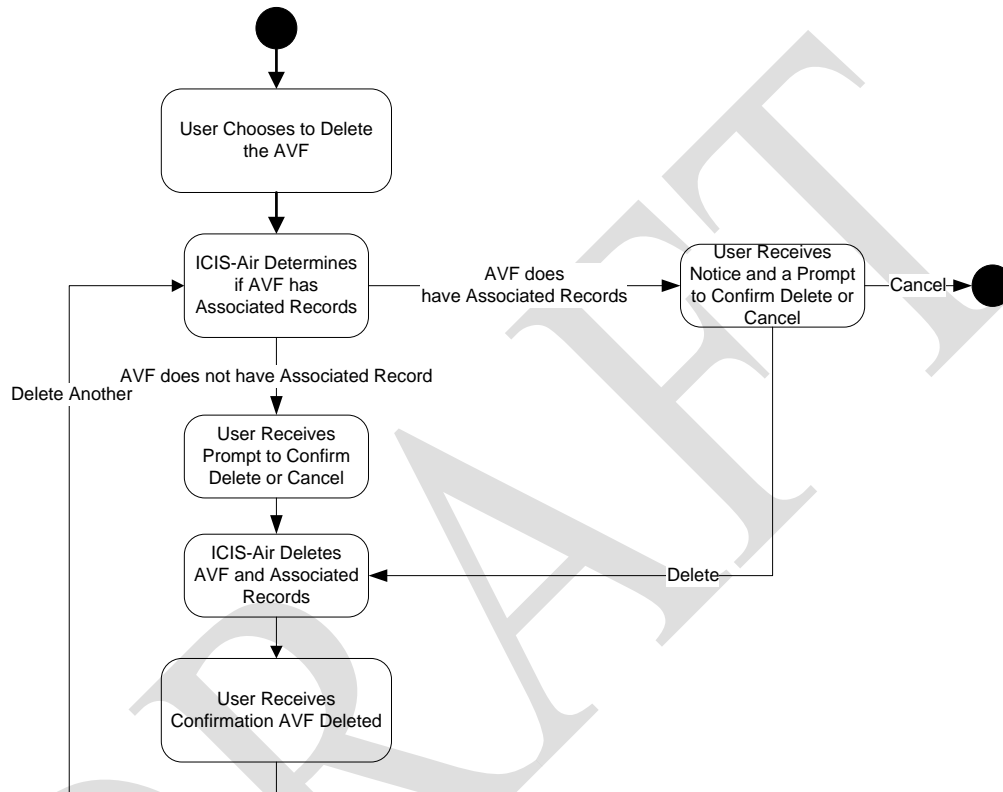
3.4.8 Search Alleged Violation Files—Web Only

Users will be able to view a list of all Alleged Violation Files. ICIS-Air will display the List Alleged Violation Files screen populated with a list of Alleged Violation Files based on the search criteria.

From the Alleged Violation File List screen, users can perform the following operations:

- Add Alleged Violation File
- Edit Alleged Violation File
- Delete Alleged Violation File.

Figure 3.4-12 shows the notional Alleged Violation Files search screen. Note: The figure is one continuous screen but broken into multiple figures for legibility.

Figure 3.4-12. Notional Screen: Search Alleged Violation Files

Figure 3.4-13 shows the notional List Alleged Violation Files screen of search results.

Figure 3.4-13. Notional Screen: List Alleged Violation Files

3.5 EXTERNAL INTERFACE SYSTEMS

Legacy AFS does not currently interface with any external systems in an automated fashion, although some manual extractions, data comparisons, and integrations are performed. ICIS-Air will include automated external interfaces with the following systems:

- Modernized Enforcement Compliance History Online (ECHO)
- Facility Registry System (FRS)
- Envirofacts
- EPA's electronic reporting repository(ies)
- Substance Registry System (SRS).

ICIS-Air external system interface mechanisms will include but not be limited to: scheduled data imports from external systems, scheduled data exports to external systems, direct linking of data between ICIS-Air and the external system where users can view additional information stored in the external system by clicking on a link from ICIS-Air, and single sign-on capability between ICIS-Air and the external systems.

The business rules, interface rules, and exchange requirements for each external system interface are detailed in the following subsections. Note that detailed information such as table names and data fields will be determined during the ICIS-Air modernization design phase.

3.5.1 Summary of External Interface System Modernization in ICIS-Air

Some external interface functionality has been changed and improved from how it operated in legacy AFS. A summary of such changes follows.

- **Enforcement Compliance History Online**

  The Integrated Data for Enforcement Analysis (IDEA), Online Tracking Information System (OTIS), and Enforcement Compliance History Online (ECHO) systems are currently undergoing modernization merging these three systems into one system, the to-be modernized ECHO. The modernized suite of systems will be referred to as "ECHO" from this point forward.

  Specific details on the interface between ICIS-Air and ECHO will be determined during the design phase as modernized ECHO takes form. At minimum, the ICIS-Air data will be available on a nightly basis for ECHO to pull the data into ECHO's data warehouse. ICIS-Air will use a single sign-on capability that will enable users to navigate from ICIS-Air to ECHO as needed for users to enter the restricted-access area within ECHO and see pertinent data.

- **Facility Registry System**

  The Facility Registry System (FRS) is the official repository of facility data for EPA. Legacy AFS provided data in flat file formats to FRS on a quarterly basis. ICIS-Air will leverage the existing ICIS/FRS data transfer process to include Air facility interests. The interface between ICIS-Air and FRS will facilitate the transfer of facility and associated programmatic interest data between FRS and ICIS-Air. This transfer will enable ICIS-Air users to view, update, and copy FRS facility and associated programmatic interest data.

  At minimum, ICIS-Air and FRS will share data on a monthly basis. ICIS-Air will interface with FRS directly by linking Facilities data between the two systems. ICIS-Air

will use a single sign-on capability that will enable users to navigate between ICIS-Air and FRS once FRS implements single sign-on capability.

- **Envirofacts**

  Envirofacts is a one-stop source for the public to obtain environmental information from EPA. Legacy AFS provided data in flat file formats to Envirofacts on a quarterly basis. The flat files contained the following data:
  - Facilities
  - Air Programs/Air Program Pollutants
  - Actions such as Full and Partial Compliance Evaluations, Enforcement Actions, Stack Tests, Investigations, Title V Annual Compliance Certification Reviews, Notices of Violation, HPV Day Zero, and HPV Resolved.

  ICIS-Air will enable Envirofacts to pull non-enforcement sensitive data directly from a copy of the entire ICIS-Air database, which will be updated nightly. Envirofacts personnel will be able to load the ICIS-Air data into the Envirofacts data warehouse to meet the requested data needs.

- **Electronic Reporting Repository**

  Electronic data and reports are submitted by the Regulated Community via the Central Data Exchange (CDX), and data are loaded into the EPA's electronic reporting repository in WebFIRE via the Electronic Reporting Tool (ERT). Legacy AFS does not import electronic data from an external system. ICIS-Air will import electronic data and link the record to the electronic reports stored in the electronic reporting repository, assumed to be WebFIRE.

- **Substance Registry System**

  The Substance Registry System (SRS) is EPA's central system for information about substances that are tracked or regulated by EPA or other sources. The SRS provides a common basis for identifying substances across different EPA data systems or sources. Legacy AFS does not interface directly with SRS; ICIS-Air will have an automated process to interface with the SRS. ICIS-Air will contain a pollutant table that is mapped to substances in the SRS. Data transfers from the SRS will occur on a nightly basis.

The following sections discuss the details behind these modernization features and the requirements and processes that will support external interface systems in ICIS-Air.

3.5.2 ECHO

The ICIS-Air database will be available on a nightly basis for ECHO to pull the data into ECHO's data warehouse. ICIS-Air and ECHO will link shared data between the two systems by the AFS and/or FRS ID and users will be able to navigate between ICIS-Air and ECHO to view detailed information on the shared data.

3.5.2.1 ECHO Requirements

Table 3.5-1 lists the requirements that apply to the ICIS-Air/ECHO interface. Table 3.5-1 includes the business rules for interfaces and data exchanges between ICIS-Air and ECHO.

Table 3.5-1. ICIS-Air ECHO Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.22.4, 5.23.3, 5.23.5	EPA SRS	The system shall enable ECHO to pull the latest copy of the entire ICIS-Air transactional database, including enforcement sensitive data, on a nightly basis.	ICIS-Air version 1.0
2.	5.21.3	EPA SRS	The system shall provide single sign-on capability that allows the user to seamlessly navigate between ICIS-Air and ECHO.	ICIS-Air version 1.0
3.	5.22.4, 5.21.3, 5.23.3	EPA SRS	The system shall link the shared data between ICIS-Air and ECHO through the AFS and/or FRS ID.	ICIS-Air version 1.0
4.	5.22.4, 5.23.3	EPA SRS	The system shall allow the user to send selected parameters to view additional information in ECHO.	ICIS-Air version 1.0
5.	5.24.11	EPA SRS	The system shall provide functionality to allow users to submit and track data correction requests. Note: EPA will leverage the Office of Environmental Information's (OEI) process for data error correction.	ICIS-Air version 1.0
6.	N/A	N/A	The system shall provide a system administration function to perform system configurations such as scheduling the frequency of data exports and viewing notifications for interfacing with ECHO.	ICIS-Air version 1.0

3.5.2.2 ECHO Process

The entire ICIS-Air transactional database will be made available on a nightly basis for ECHO to pull data from ICIS-Air. The interface between ICIS-Air and ECHO will occur in the following sequence as illustrated in Figure 3.5-1:

1. The latest copy of the ICIS-Air transactional database will be made available on a nightly basis. The latest ICIS-Air database will include enforcement sensitive data.

2. ECHO will pull the ICIS-Air data using its own ECHO Extract Transform Load (ETL) process.

Figure 3.5-1. ICIS-Air and ECHO Interface Process
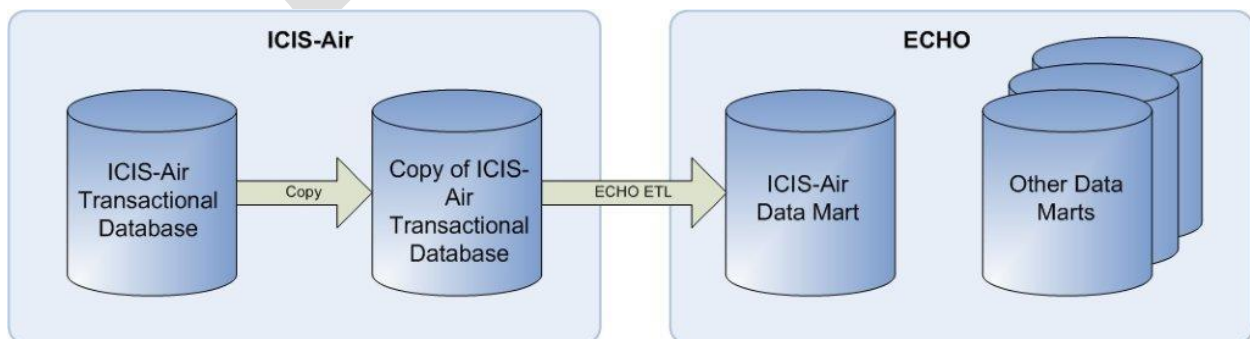
3.5.3   FRS

ICIS-Air and FRS will share data on a monthly basis in addition to Facility data being linked directly between the two systems. The ICIS-Air and FRS data sharing process will leverage the existing ICIS and FRS process to incorporate Air Program data.

3.5.3.1   FRS Requirements

Table 3.5-2 lists the requirements that apply to the ICIS-Air/FRS interface. Table 3.5-2 includes the business rules for interfaces and data exchanges between ICIS-Air and FRS.

Table 3.5-2. ICIS-Air FRS Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.22.3	EPA SRS	The system shall export the following types of data to FRS: • Facility • Facility Affiliation • Alternate Name • Contact • Address • Organization • Interest • Supplemental Interest • Pollutant • NAICS Code • SIC Code • Portable Source Flag • Portable Source Site Name • Portable Source Start Date • Portable Source End Date	ICIS-Air version 1.0
2.	5.22.3	EPA SRS	The system shall not export enforcement sensitive data to FRS.	ICIS-Air version 1.0
3.	5.22.3	EPA SRS	The system shall export ICIS-Air data on a monthly basis on the last business day of the month at a minimum.	ICIS-Air version 1.0
4.	5.4.9	EPA SRS	The system shall link the data between ICIS-Air and FRS through the AFS and/or FRS ID.	ICIS-Air version 1.0
5.	5.4.9	EPA SRS	The system shall allow the user to send selected parameters to view additional information in FRS.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
6.	5.4.9, 5.22.3	EPA SRS	The system shall import the following types of data from FRS: • Facility • Facility Affiliation • Alternate Name • Contact • Address • Organization • Interest • Supplemental Interest • NAICS • SICS • Facility Site (FRS Parent Data) • System Reference • Agency Reference • Interest Reference • Tribal Entity Reference • Tribal Lane Reference • Attainment Area • Nonattainment Area • Latitude • Longitude • Portable Source Flag • Portable Source Site Name • Portable Source Start Date • Portable Source End Date	ICIS-Air version 1.0
7.	5.4.9	EPA SRS	The system shall import FRS data into ICIS-Air that have been inserted, updated, and deleted since the last import.	ICIS-Air version 1.0
8.	5.4.9	EPA SRS	The system shall import FRS data on at least a monthly basis on the last business day of the month.	ICIS-Air version 1.0
9.	5.4.9, 5.22.3	EPA SRS	The system shall provide single sign-on capability which will allow the user to seamlessly navigate between ICIS-Air and FRS.	ICIS-Air version 1.0
10.	5.4.9	EPA SRS	The system shall pass parameters to FRS for geoplatform.	ICIS-Air version 1.0
11.	N/A	N/A	The system shall provide a system administration function to perform system configurations such as scheduling the frequency of data imports and viewing notifications for interfacing with FRS.	ICIS-Air version 1.0
12.	N/A	N/A	The system shall update the audit table with the system name of where the FRS data came from and the date of when the data was imported into ICIS-Air for all new FRS data.	ICIS-Air version 1.0
13.	N/A	N/A	The system shall update the audit table with the system name of where the FRS data came from and the date of when the data was updated in ICIS-Air for all existing FRS data.	ICIS-Air version 1.0
14.	N/A	Comments	The system shall not export CMS, AVF, Air Programs and Compliance Monitoring Activity data to FRS.	ICIS-Air version 1.0

3.5.3.2   FRS Process

ICIS will push the following types of data to FRS:

- Facility
- Facility Affiliation
- Alternate Name
- Contact
- Address
- Organization
- Interest
- Supplemental Interest
- Compliance Monitoring Strategy (CMS)
- Violation (HPV/FRV)
- Air Programs
- Portable Source Information
- Compliance Activity.

The following types of data will be pushed from FRS to ICIS-Air:

- Facility
- Facility Affiliation
- Alternate Name
- Contact
- Address
- Organization
- Interest
- Supplemental Interest
- NAICS
- SICS
- Facility Site (FRS Parent Data)
- System Reference
- Agency Reference
- Interest Reference
- Tribal Entity Reference
- Tribal Lane Reference
- Attainment Area
- Nonattainment Area
- Latitude
- Longitude
- UTM Coordinate
- Portable Source Information.

The interface between ICIS-Air and FRS will occur in the following sequence as illustrated in Figure 3.5-2:

1. ICIS-Air will load outgoing data based on insert, update, and delete transactions since the last load into outgoing staging area tables to send to FRS. These data will be loaded on a monthly basis at a minimum and will not include enforcement sensitive data.

2. FRS will load ICIS-Air transactions from the staging area tables.

3. FRS will load incoming data based on insert, update, and delete transactions since the last load into incoming staging area tables to send to ICIS-Air. These data will be loaded on a monthly basis at minimum.

4. ICIS-Air will incorporate incoming FRS data into the ICIS-Air database. The ICIS-Air process will empty the incoming staging area tables once all FRS data have been loaded into ICIS-Air.

Figure 3.5-2. ICIS-Air and FRS Interface Process
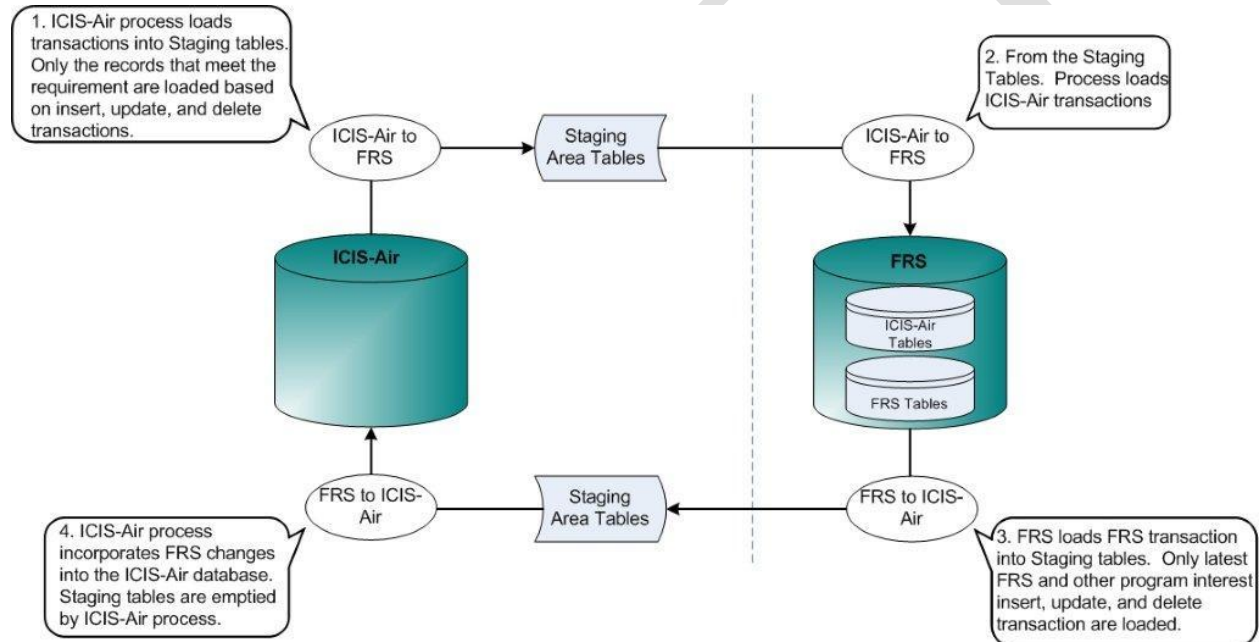
3.5.4   Envirofacts

The ICIS-Air and Envirofacts data sharing process will leverage the existing ICIS and Envirofacts process. The entire ICIS-Air transactional database will be made available on a nightly basis for Envirofacts to pull the data.

3.5.4.1   Envirofacts Requirements

Table 3.5-3Table 3.5-2 lists the requirements that apply to the ICIS-Air/Envirofacts interface. Table 3.5-3 includes the business rules for interfaces and data exchanges between ICIS-Air and Envirofacts.

Table 3.5-3. ICIS-Air Envirofacts Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.22.5	EPA SRS	The system shall provide the latest copy of the entire ICIS-Air transactional database on a nightly basis to Envirofacts.	ICIS-Air vesion 1.0
2.	5.22.5	EPA SRS	The system shall not include enforcement sensitive data in the latest copy of the ICIS-Air transactional database for Envirofacts.	ICIS-Air vesion 1.0
3.	N/A	N/A	The system shall provide a system administration function to perform system configurations such as scheduling the frequency of data exports and viewing notifications for interfacing with Envirofacts.	ICIS-Air vesion 1.0

3.5.4.2 Envirofacts Process

ICIS-Air will make a copy of the entire transaction database available, excluding the enforcement sensitive data, for Envirofacts to pull the data. The types of data that will be included but are not be limited to:

- Facilities
- Air Programs
- Air Pollutants
- Full Compliance Evaluations
- Partial Compliance Evaluations
- Enforcement Actions
- Stack Tests
- Investigations
- Title V Annual Compliance Certification Reviews
- CEMs/EERs
- Information Requests
- Notices of Violation
- HPV Day Zero
- HPV Resolved.

The interface process between ICIS-Air and Envirofacts will occur in the following sequence as illustrated in Figure 3.5-3:

1. The latest copy of the ICIS-Air transactional database will be made available on a nightly basis. The latest ICIS-Air database will not include enforcement sensitive data.

2. Envirofacts will pull the ICIS-Air data using its own Envirofacts Extract Transform Load (ETL) process.

Figure 3.5-3. ICIS-Air and Envirofacts Interface Process
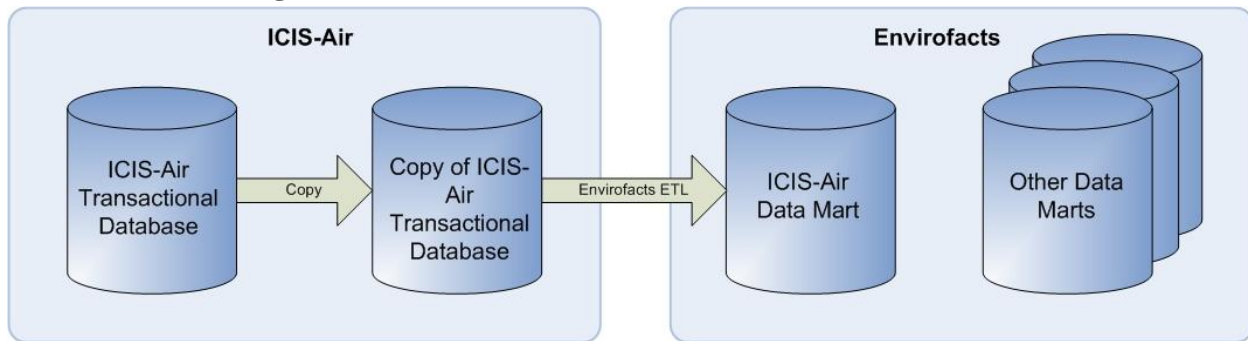
3.5.5 Electronic Reporting Repository

ICIS-Air will plan to import the following types of electronic data from EPA's electronic reporting repository:

- Stack Test
- CEM/EER
- Wood Stoves.

Although plans are underway, the types of imported data will change or will require refinement since not all regulations have been solidified and/or electronic data may not be available.

The final electronic report's metadata will be imported from the electronic reporting repository on a scheduled basis. Once ICIS-Air has imported the data, two indicators will be flagged: 1) Facility level indicator that designates the Facility as having data imported from an external system; 2) Record level indicator that designates the record as being data imported from an external system. Furthermore, a notification will be sent to the Regulatory Agency informing them of the availability of new data. All external system-supplied metadata will be read-only. For Stack Tests, users will be able to modify additional data elements that were not supplied by the external system.

ICIS-Air will not import the physical electronic reports, only the structured data around them. ICIS-Air will link the imported record to the physical electronic report that resides in the electronic reporting repository.

Some open items have been identified during the requirements discussions. The following topics will be defined in detail during the design phase:

1. What types of Facility data will be transferred from the electronic reporting repository; ERT currently does not require entry of the AFS Facility ID.
2. How the electronic reporting repository uniquely identifies each record for linking.
3. Data element mappings between ICIS-Air and the electronic reporting repository.
4. ICIS-Air will have the capability to assign multiple version numbers to the actual electronic reports that reside on WebFIRE or ERT, but these external systems only store the latest version of the electronic report.
5. How batch users will be notified when imported data are available so they can batch in review information for the imported Stack Test data, including how they will receive the Unique Identifier.

3.5.5.1 Electronic Reporting Repository Requirements

Table 3.5-4 lists the requirements that apply to the ICIS-Air/Electronic Reporting Repository interface. Table 3.5-4 includes the business rules for interfaces and data exchanges between ICIS-Air and the Electronic Reporting Repository.

Table 3.5-4. ICIS-Air Electronic Reporting Repository Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.14.3	EPA SRS	The system shall import only the metadata and not the actual electronic reports from the electronic reporting repository on a nightly basis.	ICIS-Air version 1.0
2.	5.14.3	EPA SRS	The system shall automatically set the Stack Test's indicator, Data Imported from External System, to "Yes" if the data were imported from the electronic reporting repository.	ICIS-Air version 1.0
3.	5.14.3	EPA SRS	The system shall import the following data elements for Stack Tests; the data fields shall include but not be limited to: • FRS ID or AFS Facility ID • Testing Company Name • Testing Company Address 1 • Testing Company Address 2 • Testing Company City Name • Testing Company State Name • Testing Company Zip • Testing Company Contact • Testing Company Phone • Testing Company Fax No. • Testing Company E-mail Address • Permitted Source Name • Stack Test Description • Applicable Air Programs • Date Test is Scheduled • Date Test Completed • Parameter/Pollutant Tested • Method Codes • Allowable Number • Allowable Units • Actual Number • Actual Units	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
4.	N/A		The system shall import the following data elements for CEM; the data fields shall include but not be limited to: • Facility ID • Facility Name • Emissions Point ID • Manufacturer • Model Number • Serial Number • Applicable Air Programs • Monitoring Requirements • Permit ID • Enforcement Agency • Installation Date • Certification Date • Pollutant • Permissible Emission Limit • Permissible Emission Limit Unit • Diluent • Process Unit Description • Compliance/Emission Point • Channel Number • Source Classification Code	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

5.	N/A		The system shall import the following data elements for EER; the data fields shall include but not be limited to:
			• Facility ID
			• Emissions Point ID
			• Reporting Period Start Date
			• Reporting Period End Date
			• Pollutant
			• Total Source Operating Time
			• Changes in Process or Controls Since Last Report
			• Was there an Occurrence of Excess Emission to Justify an Excess Emissions Report?
			• Link to Report
			• Basis of Estimate
			• Contacts and Addresses
			  – Affiliation
			  – First Name
			  – Last Name
			  – Address
			  – Phone
			  – Fax
			  – E-mail
			  – Office
			  – Organization
			• Startup and Shutdown
			• Startup and Shutdown Unit
			• Control Equipment Problems
			• Control Equipment Problems Unit
			• Cleaning
			• Cleaning Unit
			• Process Problems
			• Process Problems Unit
			• Fuel Problems
			• Fuel Problems Unit
			• Monitoring Malfunction
			• Monitoring Malfunction Unit
			• Control Malfunction
			• Control Malfunction Unit
			• Other Known Causes
			• Other Known Causes Unit
			• Unknown Causes
			• Unknown Causes Unit
			• Total Duration of Excess Emission
			• Total Duration of Excess Emission (%)
			• Monitor Equipment Malfunctions
			• Monitor Equipment Malfunctions Unit
			• Non-Monitor Equipment Malfunctions
			• Non-Monitor Equipment Malfunctions Unit
			• Quality Assurance Calibration
			• Quality Assurance Calibration Unit
			• Repair
			• Repair Unit
				ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Preventative Maintenance • Preventative Maintenance Unit • Data Backup • Data Backup Unit • Recertification • Recertification Unit • Other Known Causes • Other Known Causes Unit • Unknown Causes • Unknown Causes Unit • Total Number of Readings Missed • Total Percentage of Readings Missed • Total CEMS Downtime • Total CEMS Downtime (%) • Event Occurrence Number • Date and Time Event Begins • Date and Time Event Ends • Reason for Excess Emission • Duration of Excess Emission Event • Duration of Excess Emission Event Unit • Total Time • Notes	
6.	N/A		The system shall import the following data elements for Wood Stoves; the data fields shall include but not be limited to: • Unique Identifier • Model Number • Model Name • Wood Heater Type • Regulation Subpart • Certification Number • Certification Status • Link to Certification Application • Facility Name • Facility ID • Facility Address • Facility City • Facility State • Facility Zip Code • Facility Phone Number • Facility EIN Number • Non-Government Contacts and Addresses – Affiliation – First Name – Last Name – Address – Phone – Fax – E-mail – Office – Organization • Permanent storage location and the measures taken to seal the	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
			unit against tampering	
			• Describe any special operation instruction that were provided to the laboratory	
			• Firebox Dimensions	
			• Cross Sectional Area of Inlets, Outlets, and Location and Method of Control	
			• Baffles - Dimensions and Location	
			• Refractory, Insulation, Dimension, Location, and Materials	
			• Catalyst - Dimensions and Location	
			• Catalyst bypass mechanism and catalyst bypass gap tolerances: dimensions, cross sectional area and location	
			• Flue Gas Exit - Location and Exit	
			• Door and catalyst bypass gaskets: dimensions, fit and materials	
			• Outer shielding and coverings: dimensions and location	
			• Fuel feed system (if applicable) - fuel feed rate, auger motor design and power rating, and the angle of the auger to firebox	
			• Forced air combustion system (if applicable) - location and horsepower of blower motors and fan blade size	
			• Dimensions Tolerances greater than +/-.25" (or +/-5% for cross sectional areas) when all components are assembled	
			• Tested Wood Heater Material if Different from Manufacturer	
			• Link to Photographs	
			• Link to Owner's Manual	
			• Catalyst Brand and Model	
			• Can the catalyst be visually inspected during normal heater operation or under typical installation conditions? Describe what the owner must do to make observation	
			• Describe catalyst installation and removal procedures	
			• Catalyst Warranty	
			• Describe location, size, and design of ports for monitoring catalyst temperature. Identify commercially available monitoring devices which are compatible	
			• Laboratory Name	
			• Laboratory Address	
			• Altitude	
			• Describe sampling location relative to wood heater	
			• Analytical Methods	
			• Test Fuel Properties	
			• Link to Test Reports	
			• Link to Firebox Configuration	
			• Link to Sampling Location Drawings and Photographs	
			• Link to Laboratory Certificate of Conformity	
			• Date Received	
			• Date of Test	
			• Sampling Method	
			• Number of Test Runs	
			• Variations in Certification Test	
			• Summary of Test Data	
			• Process Operation During Test	
			• Sampling Calculations and Results	
			• Raw Field Data	

ID	Client Req ID	Source Reference	Requirement	Planned Release
			• Sampling and Operation Records • Sampling and Analytical Procedures • Analytical Data • Test Run Problems and Solution • Calibration procedures and results, certification procedures, sampling and analysis procedures • Test Method quality control procedures and results – leak checks, volume meter checks, stratification (velocity) checks, proportionality results • Additional Information • Test Participants Affiliation • Test Participants Contacts and Addresses – Affiliation – First Name – Last Name – Address – Phone – Fax – E-mail – Office – Organization	
7.	N/A	EPA SME Meeting	The system shall import the following Wood Stoves Manufacturer Contact Information: • Designated Representative • Telephone Number • Fax Number • Company Name • Address • EIN for domestic manufacturers • FRS ID	ICIS-Air version 1.0
8.	N/A	EPA SME Meeting	The system shall import Wood Stoves Certification Review Status data.	ICIS-Air version 1.0
9.	N/A	EPA SME Meeting	The system shall import EPA Certified Wood Heaters data.	ICIS-Air version 1.0
10.	N/A	EPA SME Meeting	The system shall import EPA Accredited Testing Laboratories data.	ICIS-Air version 1.0
11.	N/A	EPA SME Meeting	The system shall import 3rd Party ISO Accredited Laboratories data.	ICIS-Air version 1.0
12.	5.14.3	EPA SRS	The system shall link the data between ICIS-Air and the electronic reporting repository through the AFS Facility ID and/or FRS ID.	ICIS-Air version 1.0
13.	5.14.3	EPA SRS	The system shall send a notification displaying a Critical Data Element report to the Delegated Agency when new imported data have been received from the electronic reporting repository and are available for reviewing. Refer to the Reports module for report details.	ICIS-Air version 1.0
14.	5.14.3	EPA SRS	The system shall send an Error Report to the system administrator when there are errors during the data load from the electronic reporting repository.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
15.	5.14.3	EPA SRS	The system shall be able to link to multiple versions of the same electronic reports that reside on the electronic reporting repository to the record in ICIS-Air. (Note: this assumes the capability of the electronic reporting repository to store multiple versions)	ICIS-Air version 1.0
16.	5.18.2	EPA SRS	The system shall generate the date, timestamp, Unique Identifier, and version of the electronic reports.	ICIS-Air version 1.0
17.	N/A		The system shall provide a system administration function to perform system configurations such as scheduling the frequency of data imports and viewing notifications for interfacing with the electronic reporting repository.	ICIS-Air version 1.0
18.	N/A		The system shall update the audit table with the system name of where the electronic data came from and the date of when the data was imported into ICIS-Air for all new electronic data.	ICIS-Air version 1.0
19.	N/A		The system shall update the audit table with the system name of where the electronic data came from and the date of when the data was updated in ICIS-Air for all existing electronic data.	ICIS-Air version 1.0
20.	N/A		The system shall default the Stack Test fields Test Result and Stack Test Status to blank for imported Stack Test data.	ICIS-Air version 1.0
21.	N/A		The system shall not import the Stack Test record if the imported Stack Test's Date Test Completed and Parameter/Pollutant Tested match an existing Stack Test record in ICIS-Air.	ICIS-Air version 1.0
22.	N/A		The system shall provide an error message to the system administrator if the imported Stack Test's Date Test Completed and Parameter/Pollutant Tested match an existing Stack Test record in ICIS-Air.	ICIS-Air version 1.0

3.5.5.2   Electronic Reporting Repository Process

The interface process between ICIS-Air and the electronic reporting repository will occur in the following sequence as illustrated in Figure 3.5-4:

1. ICIS-Air will import the electronic data that were last inserted, updated, or deleted on a nightly basis.
2. Electronic data will be loaded into staging tables.
3. If no errors occurred during the import, ICIS-Air will load the electronic data into the ICIS-Air database.
4. ICIS-Air will generate a Critical Data Element Report that provides information on the status and availability of the electronic data.

Figure 3.5-4. ICIS-Air and EPA Electronic Reporting Repository Interface Process
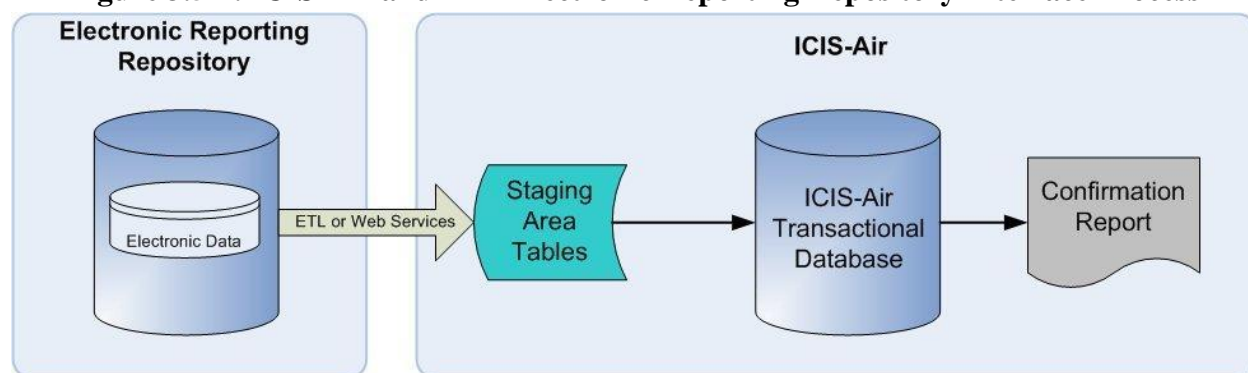
3.5.6   SRS

The SRS is EPA's centralized system for substance pollutant data and will be synched up with ICIS.

The legacy AFS and ICIS pollutant tables will need to be synched up with each other and also with SRS as part of the migration process. Once the pollutant tables have been synched, ICIS-Air will utilize the existing ICIS ref_pollutant table, which will be modified to include the "AFS Code" column to facilitate batching if the determination is made to batch Air pollutants using the legacy AFS pollutant codes.

3.5.6.1   SRS Requirements

Table 3.5-5 lists the requirements that apply to the ICIS-Air/SRS interface. Table 3.5-5 includes the business rules for interfaces and data exchanges between ICIS-Air and SRS.

Table 3.5-5. ICIS-Air SRS Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	N/A	SRS SME Meeting	The system shall update the exiting ICIS pollutant tables to include the AFS Pollutant Code.	ICIS O&M
2.	N/A	SRS SME Meeting	The system shall import substance data from the SRS on a scheduled basis; initial recommendation is nightly.	ICIS O&M
3.	N/A	SRS SME Meeting	The system shall import the following Pollutant/Substance data from SRS: • SRS ID • EPA ID • CAS Number • Chemical Formula (we believe this is the SRS Molecular formula) • SRS Systematic Name.	ICIS O&M
4.	N/A	SRS SME Meeting	The system shall import pollutant/substance data from SRS that have been added or modified from the last update including substances with Pending statuses.	ICIS O&M
5.	N/A	SRS SME Meeting	The system shall not delete any pollutant/substance data from the pollutant tables even if the substance was deleted from the SRS.	ICIS O&M

ID	Client Req ID	Source Reference	Requirement	Planned Release
6.	N/A		The system shall provide a system administration function to perform system configurations such as scheduling the frequency of data imports and viewing notifications for interfacing with the electronic reporting repository.	ICIS O&M
7.	N/A		The system shall update the audit table with the system name of where the SRS data came from and the date of when the data was imported into ICIS-Air for all new SRS data.	ICIS O&M
8.	N/A		The system shall update the audit table with the system name of where the SRS data came from and the date of when the data was updated in ICIS-Air for all existing SRS data.	ICIS O&M

3.5.6.2   SRS Process

There are two potential interface processes for how pollutants/substances will added or changed in ICIS-Air. The processes can be initiated through SRS or through ICIS-Air as outlined in the sections below. These processes will be further defined and selected during the design phase.

The interface process for data changes initiated from SRS to ICIS-Air will occur in the following sequence as illustrated in Figure 3.5-5:

1. ICIS-Air will pull the pollutant/substance data using an SRS web service into tables in the staging area. Pollutant/Substance data will include any new or modified data from the last pull including substances with Pending statuses.
2. ICIS-Air will load the substance data into the pollutant tables.

Figure 3.5-5. SRS to ICIS-Air Interface Process
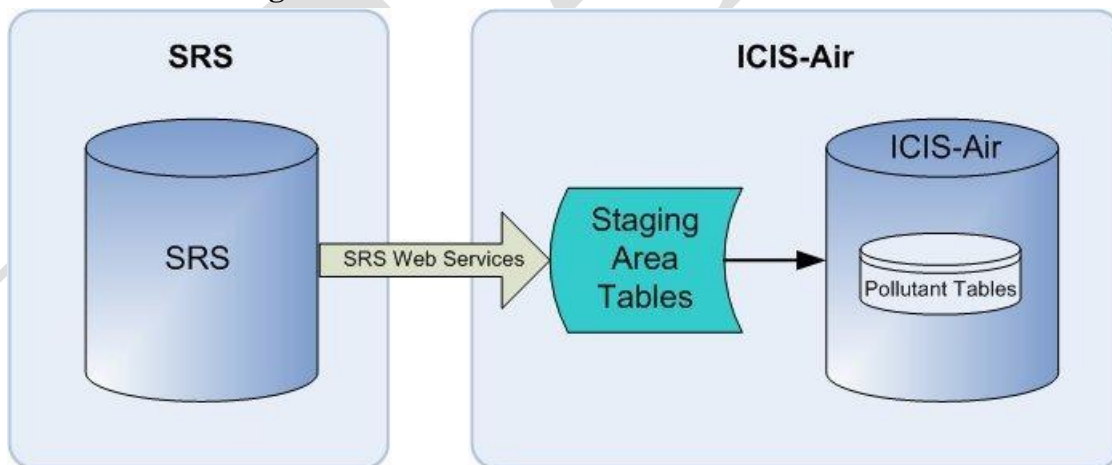
If selected to be implemented, the interface process for data changes initiated from ICIS-Air to SRS will occur in the following sequence as illustrated in Figure 3.5-6:

1. ICIS-Air will send any new or updated pollutants/substances to SRS.
2. SRS will load ICIS-Air pollutants/substances into the SRS database. SRS will set new pollutants/substances to "Pending" status. New data or updates to existing data will be reviewed prior to being accepted onto the current Substance List. The SRS ID, EPA ID, CAS Number, Chemical Formula, and SRS Systematic Name will be assigned to new pollutants/substances once they are accepted.

3. SRS sends pollutants/substances to ICIS-Air with SRS specific data: SRS ID, EPA ID, CAS Number, Chemical Formula, and SRS Systematic Name.

4. ICIS-Air loads SRS data into tables in the staging area and maps the SRS specific data to the pollutant/substance data in ICIS-Air. ICIS-Air will load the final SRS data into pollutant tables. ICIS-Air will need to know how to map the returned data to records initiated in ICIS-Air to begin with.

Figure 3.5-6. ICIS-Air to SRS Interface Process
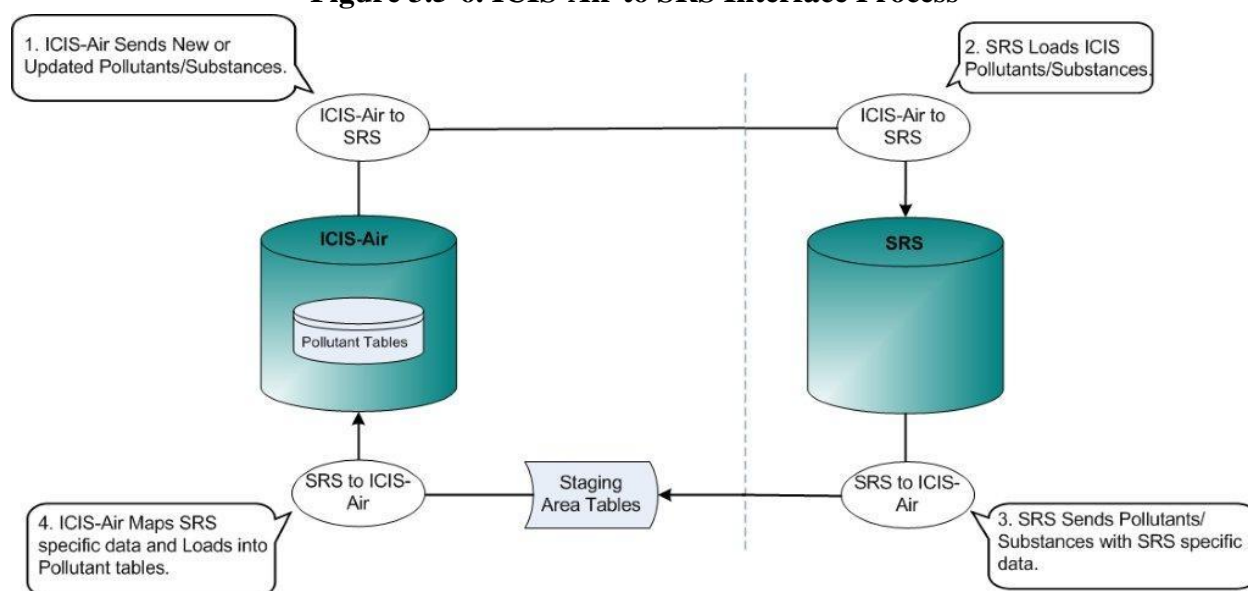
3.6 MINIMUM DATA REQUIREMENTS

EPA Headquarters and Agencies agree upon a set of minimally reported data, through the ICR process, that Delegated Agencies must report to ICIS-Air. A Minimum Data Requirement (MDR) is data that meets a pre-defined set of criteria that must be submitted to ICIS-Air from the Delegated Agencies. Minimum Data Requirements apply at both the record and field level of the modernized system. Some system data families are optional, but if reported, have MDRs that must be submitted. For example, Permit reporting is optional, but if Permit data are submitted, the Permit Identifier must be submitted. Any user-provided system-required fields for Delegated Agencies also must be MDRs. However, not all MDRs will be system-required to save a record. For example, TV ACC Received Date is an MDR but cannot be entered until the data are actually received. MDRs also are known as programmatic requirements.

3.6.1 Summary of Minimum Data Requirements Modernization in ICIS-Air

Some MDR functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **MDRs and the Graphical User Interface**
  Visual indicators on the Graphical User Interface (GUI) will highlight MDRs that are programmatically required and MDRs that are system-required to assist users in data entry.

- **Data Element Dictionary**

    The Data Element Dictionary (DED) will have an indicator for MDRs for user reference. The ICIS-Air database tables and fields will be used to generate the DED and store attributes describing the data elements in the system; these descriptions will be populated by EPA headquarters/contractor staff. The DED will provide basic information about the data element as well as information about its location in the database. Options will be available for an ICIS-Air user to view an "ICIS-Air" DED and an "ICIS-Air MDR DED" showing only ICIS-Air MDRs in addition to the standard DED formats.

Data Element Basic Information:

- Definition: Provides a basic definition of the data element
- Edit Checks: Indicates the Data Type and highlights valid format/values for submission. For Reference Table values, this section will list the Active values for that data element where the list of values is not prohibitively long. For Reference Table values that exceed the allowable length for the DED, users will be able to view the full length of reference values in the database via a report.
- System: References the system(s) to which the Data Element applies (i.e., FE&C, NPDES, AFS)
- Requirement Information: Indicates requirement type (e.g., System Required, Program Required, Minimum Data Requirement)
- Required Comments: Indicates any supplemental information about how the data are required for a data element (e.g., limitations on MDRs, such as only an MDR for a subset of facility types)
- Source: Indicates the source of the data element (e.g., Interface system, User Provided, System Generated)
- Database Location: Indicates both the Database Table, as well as Column, location of the Data Element

Users will have the ability to create custom views of the DED and to search for MDRs.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the Minimum Data Requirement module in ICIS-Air.

3.6.2 MDR Functional Requirements

Table 3.6-1 lists the requirements that apply to Minimum Data Requirements. It includes functions that are allowed and business rules within a function.

Table 3.6-1. ICIS-Air MDR Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.2.4, 5.3.3	EPA SRS	The system shall depict Minimum Data requirements (MDRs) on the Graphical User Interface (GUI) with visual indicators.	ICIS-Air version 1.0
2.	5.2.4, 5.3.3	EPA SRS	The system shall differentiate between programmatically required and system required MDRs with separate visual indicators on the GUI.	ICIS-Air version 1.0
3.	5.2.4, 5.3.3	EPA SRS	The system shall indicate programmatically required and system required MDRs in the Data Element Dictionary (DED).	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
4.	5.3.1	EPA SRS	The system shall provide the capability to collect, store, and extract all current MDRs.	ICIS-Air version 1.0
5.	5.3.2	EPA SRS	The system shall provide built in flexibility to add, modify, or delete MDRs in the future to support new policy or management initiatives.	ICIS-Air version 1.0

3.6.3 MDR and the Graphical User Interface

Figure 3.6-1 shows the notional TV ACC GUI screens, with notional separate visual indicators for programmatically required and system required MDRs, in ICIS-Air. Data fields that are either system required or both programmatically and system required are identified with the visual indicator of an asterisk (*). Data fields that are programmatically required, but not system-required to save the record, are identified with the visual indicator of a "caret" (^). Note: These symbols are notional and can be updated during formal screen design.

Figure 3.6-1. Notional Design Screen: System Required and MDR On-Screen Indicators
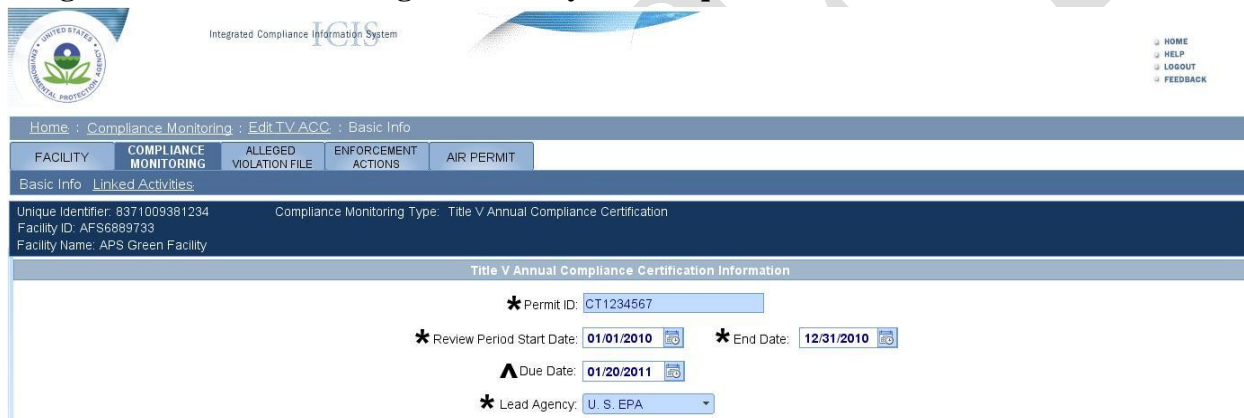
3.6.4 MDRs and the Data Element Dictionary

Figure 3.6-2 illustrates an example screen for the Data Element Dictionary in ICIS-Air.

Figure 3.6-2. Notional Design Screen: Data Element Dictionary

TV ACC Received Date		
Alternate Name / Screen Label:		
Data Element Basic Information		
Data Element Definition	This is the date on which a Title V Annual Compliance Certification (TV ACC) was received.	
Edit Checks	Must be less than or equal to system date.	
System	AFS	
System Required	No	
Program Required	AFS MDR	
Required Comment	Received date is programmatically required when the TV ACC is received.	
Source	System or user-provided	
Reports		
Universe	**Folder**	**Object**
ICIS-Air Ad Hoc	TV ACC	TV ACC Received Date
Database		
Table Name in Database	ICIS_TVACC	
Database Column Name	TVACC_RECEIVED_DATE	
Database Data Type	DATE	
Table Description	This stores basic data of an AFS Title V ACC.	

3.7 ELECTRONIC DOCUMENTS

As the EPA moves towards electronic reporting, Electronic document management is a proposed function for ICIS-Air. Electronic document management would allow users to access electronic versions of documents related to air enforcement and compliance activities, such as permits, inspection reports, photos and digitized maps. The availability of such supporting documents would greatly improve the quality and relevance of data in ICIS-Air.

Utilizing metadata, the submission of electronic forms can be used to populate information in the ICIS-Air database. Simply defined, metadata is data about data. It is assumed that in the modernized system, an interface system will submit the information contained in the electronic document via an XML file to ICIS-Air. The interface system will collect metadata about the document (e.g., Facility ID, type, date of submittal) and will send the data to ICIS-Air. ICIS-Air will map the metadata and create or update a record. For example, a system that collected TV ACCs would also collect required TV ACC data such as Facility ID, Permit ID, and Review Period End Date.

The collection and use of metadata will require a separate tool outside of ICIS-Air. Electronic collection system will have a GUI that collects pre-defined data to populate ICIS-Air records. For example if there is a system that allows the Regulated Community to submit TV ACCs the facility user would enter the TV ACC information electronically on a predefined form. Once submitted, the TV ACC data would be translated into an XML format. Both the record and the file would then be submitted via batch to ICIS-Air. The system might also send the same data to the Regulatory agency's system (if one existed). The viability of receiving data in this format from the regulated community depends on EPA's ability to develop this external system.

Electronic documents can be categorized according to the source of the document: those submitted by the regulated community and those submitted by the regulatory agency. The type of

document, as dictated by source, will determine who the document is accessed/submitted by as well as where it is stored.

3.7.1 Regulated Community

Electronic documents submitted by the Regulated Community include—but are not limited to— Title V Annual Compliance Certifications, Stack Tests, Excess Emissions Reports, and Continuous Emissions Monitoring. Documents submitted by the Regulated Community must be able to be submitted outside of the EPA firewall and in a CROMERR-compliance manner. Additionally, the document may also need to be submitted by one or more Delegated Agency systems. It should be noted that there are significant programmatic challenges and limitations on Delegated Agencies to require and enforce submission of electronic documents.

3.7.2 Regulatory Agency

Electronic documents created and maintained by the Regulatory agency include permits, enforcement actions, and inspection reports. Documents stored in a Delegated Agencies own repository can be accessed by ICIS-Air in a number of ways, which will be addressed in the modernization items.

3.7.3 Modernization Considerations

- Document Storage
    Prior to implementation, it is imperative that the EPA determine where the documents will be stored and how they will be accessed by the user. Documents can be stored directly in the database or through the use of a commercial document management system within ICIS-Air. Similarly, there are a multitude of options in ways that users will be able to access Electronic documents. The benefits and challenges of both options are available in the tables below.

Table 3.7-1 lists the benefits and challenges of storing Electronic Documents directly in the transaction database. Table 3.7-2 lists the benefits and challenges of storing Electronic Documents in a commercial document management system within ICIS-Air.

Table 3.7-1. Benefits and Challenges of Documents Stored Directly in the Database

Benefits	Challenges
This option is easy to implement in that it does not require development of or integration with a separate standalone document management system. Documents are easily available within the context of the record; users don't have to use a separate system to access their documents or create extensive additional metadata (e.g., all documents associated with a Facility are available with the Facility record). Document retrieval will be faster since documents will be accessed from the local database system than when compared to retrieving from a remote system.	Custom development will be required. The database does not provide any virus scanning features. The application will need to ensure attachments are virus free by performing virus scanning before documents are uploaded. Versioning will need to be custom built if required. The application logic or database will need to ensure size restrictions are established and followed to prevent storage and performance issues. The application or database must implement document archival mechanisms to comply with archival policies. The application must implement security and user access models consistent with the overall system security model. Storage of document files in AFS will involve large data store needs due to the volume and size of documents potentially expected to be managed by the system.

Table 3.7-2. Benefits and Challenges of Commercial Document Management System

Benefits	Challenges
Commercial products offer robust out-of-the-box functionalities for document management in addition to what is currently required by ICIS-Air (e.g., Workflow management). The commercial products offer out-of-the-box supporting functionality such as archival, audit trail. Most commercial products contain in-built virus scanning functionality.	The use of a commercial product will require extensive custom development for integrating with ICIS-Air. Commercial products have very specific infrastructure requirements (e.g., servers, disk space) that often require dedicated environments and ongoing maintenance of such environments. There is a risk that not all functional capabilities and features of the commercial product will be needed for ICIS-Air, leading to wastage of funds and resources. There will be costs for software licensing and on-going maintenance by vendor.

- Document Access

    Users can access documents that reside on external systems via hyperlinks on the ICIS-Air screens. This option assumes that either the other system's documents are publicly available, or that a security login is embedded in the link in ICIS-Air. Documents can also be accessed through Web Services, represented as links on ICIS-Air screens. When a user clicks on a link, a Web service request is sent from ICIS-Air to the remote system. The remote system responds with a Web service response that contains the document. This request-response transaction is implemented using Web service technology. To implement this successfully, both ICIS-Air and the remote system must have Web service interfaces developed.

Table 3.7-3 lists the benefits and challenges of accessing documents through links. Table 3.7-4 lists the benefits and challenges of accessing documents through Web Services.

Table 3.7-3. Benefits and Challenges of Documents Access through Links

Benefits	Challenges
If the document is accessible via link then it is relatively simple to allow a user to manually associate links to documents with records. Since there is no local storage of the documents, there is little or no risk of storage space issues.	It is hard to maintain currency of links. Document availability is directly dependent on the availability of the remote system. Document retrieval performance is dependent on network and remote system performance. The security models of the two systems must be synchronized to enable transparent access; otherwise the user must be informed that they will be linking to a new system. It may not be possible to specify attributes to remote documents. Document ownership and synchronization issues need to be addressed. Both ICIS-Air and the remote system must agree to a common addressing and versioning mechanism for the documents.

Table 3.7-4. Benefits and Challenges of Documents Access through Web Services

Benefits	Challenges
It is relatively simpler to store links to documents that call Web services to access documents. Since the links make Web service calls, they don't have to be hard-coded to actual document addresses. This provides the flexibility for the remote systems to change the location of documents without affecting document access from ICIS-Air. Since there is no local storage of the documents, there is little or no risk of space issues. This type of a Web service communication is more robust and secure than a direct link communication.	A Web service module needs to be developed and maintained in ICIS-Air and by each remote system. Both ICIS-Air and the remote system must agree to a common Web service nomenclature mechanism for the documents. Document availability is directly dependent on the availability of the remote system. Document retrieval performance is dependent on network and remote system performance. The security models of the two systems must be synchronized to enable transparent access. It may not be possible to specify attributes to remote documents. Document ownership and synchronization issues need to be addressed.

The following section discusses the details behind these modernization features and the requirements extracted from the SRS that will support the processing of Electronic Documents in ICIS-Air.

3.7.4 Electronic Documents Functional Requirements

Table 3.7-5 lists the requirements that apply to Electronic Documents. It includes functions that are allowed and business rules within a function.

Table 3.7-5. ICIS-Air Electronic Documents Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.5.1, 5.11.5, 5.16.1	EPA SRS	The system's document management capability shall include the following features: indexing and metadata management capability, storage, and version control.	ICIS-Air version 1.0
2.	5.16.1	EPA SRS	The system shall use metadata from stack tests and TV ACCs to generate Compliance activities and negate need of agency data entry.	ICIS-Air version 1.0
3.	5.14.1, 5.16.2	EPA SRS	The system shall allow users to tag documents by facility and compliance activity/event identifiers.	ICIS-Air version 1.0
4.	5.16.2	EPA SRS	The system shall allow users to search by Electronic Documents by attributes.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
5.	5.16.3	EPA SRS	The system shall have the ability to access State/Local Regional Document management systems.	ICIS-Air version 1.0
6.	5.16.3	EPA SRS	The system shall enforce the security model for users to view documentation stored electronically.	ICIS-Air version 1.0
7.	5.11.5, 5.14.1, 5.16.4	EPA SRS	The system shall provide the capability to link directly to document storage systems, either at the state and regional levels, to facilitate information sharing.	ICIS-Air version 1.0
8.	5.16.4	EPA SRS	The system shall allow agencies to register their document storage systems in order to facilitate sharing documents.	ICIS-Air version 1.0
9.	5.23.1	EPA SRS	The system shall leverage an instance of the Agency's Enterprise Content and Document Management System (ECMS) to provide document management capability, if appropriate. The system shall meet all EPA standards for electronic document reporting.	ICIS-Air version 1.0

3.8   SECURITY

ICIS-Air will employ controls to ensure only authorized users view and update data. Security will be implemented in several technical levels:

- Application
- Reporting
- Database.

Each of these levels will need to protect data for both viewing and updating based on the following dimensions:

- Geography
- Sensitive[9] Data Access
- Function Access
- Program.

These four dimensions, detailed below, are tracked against users and data to provide the application, reporting solution, and database with the information necessary to ensure only the correct users can see and update a record.

Geography

The user profile indicates whether a user is a Headquarters (HQ), EPA Region, or Delegated Agency user. If the user is not a HQ user, the profile indicates to which EPA Region, State/Tribe/Territory, or LCON the user belongs. Data in the system are then flagged as being EPA or Delegated Agency data, and tagged with the specific EPA Region, State[10], or LCON. The application, reporting, and database software match the user geography to the data geography to determine if access is allowed.

In general, all users can see all data in the application and via reporting (except sensitive data – see below), and users can only update data that fall within their geography and below. ICIS

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[9] The use of the term "sensitive" in the following section refers to enforcement sensitive.

[10] Note: Throughout the rest of the document, the term "State" will be assumed to cover States, Tribes, and Territories.

maintains a hierarchy, with EPA HQ at the top, EPA Regions in the middle, and Delegated Agencies at the bottom. An example of how this relationship functions follows: EPA Region 1 can update all EPA Region 1 and all EPA Region 1 Delegated Agencies' data, but not EPA HQ, EPA Region 4, or Georgia data.

Sensitive Data Access

The user profile contains a flag indicating whether the user can see/access sensitive data. The flag is binary such that a user either has access to all sensitive data for the profile's geography, program, and function access (see below) or none.

Sensitive data in the system are flagged in the database, and the application, reporting solution, and database match the user's sensitive data access flag to the data flag to determine access. Users also are able to restrict the display of sensitive data when creating reports.

Function Access

The ability to update information in ICIS-Air will be determined by assigning roles to users that bundle functions which allow them to perform actions on data. Functions are bundled in roles to facilitate the ability to assign privileges to allow a user to modify or delete data. For example, there can be a role to Add/Edit a Facility, but a separate role with the Delete Facility function.

Both functions and roles are defined by who is allowed to assign the function/role (e.g., only HQ system administrators can assign functions such as Manage Government Contacts) and who is allowed to receive the function/role (e.g., a Delegated Agency user can never receive an Add/Edit News and Alerts function, as this is currently an EPA only function).

The web and batch applications match the user's Function/Role combinations with user actions to determine:

- What home page links appear on the user's screen (e.g., an EPA user who does not have any roles with an Add Enforcement Action (EA) function will not get the Add EA link on the Air, FE&C, or NPDES home pages)
- What screen functions the web user is able to perform (e.g., a user without the Add EA function will never see Add EA links and cannot access those screens)
- What XML submission types the batch user is able to submit (e.g., a user without the Add EA function will have Add EA XML transactions rejected).

Program

While EPA ICIS-Air users are typically multimedia users who can access all programs' data[11], Delegated Agency users are limited to the Air and NPDES programs. State Delegated Agency users will be able to access Air or NPDES or both sets of data, depending on their privileges. The system will need to know the program affiliation of users and the program affiliation of data and transactions to ensure that programmatic constraints are enforced. EPA users also will need to be specifically granted privileges to access Air and NPDES data.

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[11] This is currently under review by EPA.

3.8.1 User Profile Form

EPA will develop an updated user profile form to contain all the information necessary to enforce the security model. It will include user identification, type of user, contact information, roles within the system, add, edit, and delete abilities, programs, and the need for access to sensitive information. The form shall be signed by the User, the User's Supervisor, the Regional Administrator, and the HQ Security Administrator. Users will be required to fill out and have this form approved before they are granted their user ID and log in privileges.[12] ICIS-Air will maximize the default data as much as possible based on the user's profile or based on commonly used values in dropdowns. See Appendix A for a notional user profile form.

Users will be required to read and certify their intention to abide by the ICIS Rules of Behavior.[13]

3.8.2 The ICIS/ICIS-Air Sensitive Data Policy

Modernized AFS will integrate into ICIS. By definition, security will apply to the entire ICIS system, of which Air will be a subsystem. ICIS currently has a de facto sensitive data policy based on how the application enforces sensitive data. EPA is currently reviewing that policy and taking into account Air requirements, in order to develop a more formal policy. At the time of writing, the policy had not been finalized.

The following sections describe the current sensitive data policy and the changes to that policy desired by the Air community.

3.8.2.1 *Current ICIS Sensitive Data Policy*

For sensitive data, HQ users can see and update all sensitive data in the system, EPA Regional users can see all sensitive data in the system but only update their and their states' sensitive data, and state users can see all sensitive state data, but not EPA sensitive data, and can only update their own sensitive data.

There is no current programmatic restriction on who can see/update what sensitive data. For example, an EPA Regional user with the sensitive data privilege can see all sensitive data in the system, regardless of whether the data are Air, NPDES, CERCLA, etc.

Table 3.8-1 summarizes the sensitive data approach by geography by user group; it assumes the user has the Function/Role to allow access to the data and the sensitive data access privilege.

Table 3.8-1. Summary of Sensitive Data Approach by User and Geography

	View	Update
EPA HQ Users		
HQ Sensitive data	X	X
Regional (any) Sensitive data	X	X
State (any) Sensitive data	X	X
EPA Regional Users		
HQ Sensitive data	X	
Own Region Sensitive data	X	X

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[12] EPA AFS SRS 5.29.3, and 5.29.4
[13] EPA AFS SRS 5.29.6 and 5.29.8

	View	Update
Other Region Sensitive data	X	
Own States' Sensitive data	X	X
Other Regions' States' Sensitive data	X	
State Users		
HQ Sensitive data		
Own Region Sensitive data		
Other Region Sensitive data		
Own State Sensitive data	X	X
Other States' Sensitive data	X	

3.8.2.2 Updates to the ICIS Sensitive Data Policy

The Air community would like to tighten access to sensitive data in the following ways:

- Restrict sensitive data viewing by Delegated Agencies to only their own organization's data.
- Restrict view and update access to sensitive data based on program so that a user would need to be granted the explicit privilege to see/view Air or NPDES data.

Table 3.8-2 summarizes the proposed sensitive data approach by geography by user group; it assumes the user has the Function/Role to allow access to the data and the sensitive data access privilege.

Table 3.8-2. Summary of Sensitive Data Approach by User, Geography, and Program

	View Air Sensitive Data	Update Air Sensitive Data	View NPDES Sensitive Data	Update NPDES Sensitive Data
EPA HQ Users with Air Privilege				
HQ Sensitive data	X	X		
Regional (any) Sensitive data	X	X		
Delegated Agency (any) Sensitive data	X	X		
EPA Regional Users with Air Privilege				
HQ Sensitive data				
Own Region Sensitive data	X	X		
Other Region Sensitive data				
Own Delegated Agencies' Sensitive data	X	X		
Other Regions' Delegated Agencies' Sensitive data				
Delegated Agency Users with Air Privilege				
HQ Sensitive data				
Own Region Sensitive data				
Other Region Sensitive data				
Own Delegated Agency's Sensitive data	X	X		
Other Delegated Agencies' Sensitive data				
EPA HQ Users with NPDES Privilege				
HQ Sensitive data			X	X
Regional (any) Sensitive data			X	X
Delegated Agency (any) Sensitive data			X	X
EPA Regional Users with NPDES Privilege				
HQ Sensitive data				
Own Region Sensitive data			X	X
Other Region Sensitive data				

	View Air Sensitive Data	Update Air Sensitive Data	View NPDES Sensitive Data	Update NPDES Sensitive Data
Own Delegated Agencies' Sensitive data			X	X
Other Regions' Delegated Agencies' Sensitive data				
Delegated Agency Users with NPDES Privilege				
HQ Sensitive data				
Own Region Sensitive data				
Other Region Sensitive data				
Own Delegated Agency's Sensitive data			X	X
Other Delegated Agencies' Sensitive data				
EPA HQ Users with Both Privileges				
HQ Sensitive data	X	X	X	X
Regional (any) Sensitive data	X	X	X	X
Delegated Agency (any) Sensitive data	X	X	X	X
EPA Regional Users with Both Privileges				
HQ Sensitive data				
Own Region Sensitive data	X	X	X	X
Other Region Sensitive data				
Own Delegated Agencies' Sensitive data	X	X	X	X
Other Regions' Delegated Agencies' Sensitive data				
Delegated Agency Users with Both Privileges				
HQ Sensitive data				
Own Region Sensitive data				
Other Region Sensitive data				
Own Delegated Agency's Sensitive data	X	X	X	X
Other Delegated Agencies' Sensitive data				

3.8.3   Summary of Security Modernization in ICIS-Air

Some Security functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs and changing technologies. A summary of such changes follows:

- **Removal of Private Data Concept**
  Legacy AFS had a concept of private data, in which the Delegated Agencies (DAs) could flag data as private to only their organization and it was not able to be viewed or updated by EPA. These data were rarely entered in Legacy AFS, and the concept of private data will no longer be supported in the modernized system.

- **Security Emphasis on LCONs over Counties**
  In Legacy AFS, data access was driven by the counties with which a user was directly identified, rather than the counties with which the user's LCON was associated. Additionally, until a few years ago, facilities were directly associated to counties and not LCONs, when the LCON data element was added but not reliably populated. In ICIS-Air, each facility under an LCON's jurisdiction will be required to be associated with one and only one LCON. Users will also be tied to LCONs, if applicable, rather than directly to counties. This will facilitate reporting by LCON.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support security in ICIS-Air.

3.8.4 Security Functional Requirements

Table 3.8-3 lists the requirements that apply to Security. It includes functions that are allowed and business rules within a function.

Table 3.8-3. ICIS-Air Security Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
General Security Requirements				
1.	5.29.1, 5.29.7	EPA SRS	The system shall comply with all NIST and EPA security program requirements for Federal agency information technology systems.	ICIS-Air version 1.0
2.	5.29.2	EPA SRS	User IDs will expire after 90 days if not used.	ICIS-Air version 1.0
3.	5.29.2	EPA SRS	Password must be updated every 90 days.	ICIS-Air version 1.0
4.	5.29.2	EPA SRS	The system will enforce the following rules for passwords: • Minimum length of 8 characters • Maximum length of 30 characters • Must contain at least 1 alpha character • Must contain at least 1 numeric character • Must differ from the previous password by at least 3 characters • Cannot be the same as the User ID • Cannot be the same as the previous 8 passwords • Cannot have used in the last year • Cannot include: comma (,), backslash (\), and double-quote (").	ICIS-Air version 1.0
5.	5.29.5	EPA SRS	The system shall timeout after 30 minutes of inactivity, after providing users with at least two (2) timeout warnings.	ICIS-Air version 1.0
6.	5.30.1	EPA SRS	The system shall allow fields with sensitive information to be identified within the system and provide role based security to protect it.	ICIS-Air version 1.0
7.	N/A	2/13/12 Security Meeting	The system shall not contain Confidential Business Information (CBI).	ICIS-Air version 1.0
8.	N/A	2/13/12 Security Meeting	The system shall not contain Private data.	ICIS-Air version 1.0
9.	5.29.4, 5.29.6	EPA SRS, 6/21/2012 Comment Adjudication Meeting	The system shall allow users to submit user profile forms online for new, changed, and deleted accounts.	ICIS-Air version 1.0
User Management Requirements				
Geography				
10.	5.2.5, 5.26.4	EPA SRS, 5/10-15/2012 SME meetings	Users shall be identified with one and only one of the following geography types: • EPA Headquarters (HQ) • EPA Region • State/Tribe/Territory • Local Control Agency (LCON)	ICIS-Air version 1.0
11.	N/A	5/10-15/2012 SME meetings	EPA Region users shall be associated with one and only one EPA region.	ICIS-Air version 1.0
12.	N/A	5/10-15/2012 SME meetings	State/Tribe/Territory users shall be associated with one and only one state, tribe, or territory.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
13.	N/A	5/10-15/2012 SME meetings	LCON users shall be associated with one and only one LCON.	ICIS-Air version 1.0
14.	N/A		The system shall prohibit EPA HQ users from being associated to an EPA region, state or LCON.	ICIS-Air version 1.0
15.	N/A		The system shall prohibit EPA Regional users from being associated to a state or LCON.	ICIS-Air version 1.0
16.	N/A		The system shall prohibit State/Tribe/Territory users from being associated to EPA HQ, an EPA region or LCON.	ICIS-Air version 1.0
17.	N/A		The system shall prohibit LCON users from being associated to EPA HQ, an EPA region, or a state.	ICIS-Air version 1.0
Program				
18.	N/A	5/10-15/2012 SME meetings	The system shall provide the ability to explicitly grant access to the ICIS-owned programs (i.e., Air and NPDES).	ICIS-Air version 1.0
19.	5.26.3	5/22/2012 Tier 3 meeting	The system shall allow users to assign EPA users (both HQ and Regional) to the ICIS-owned programs.[14]	ICIS-Air version 1.0
20.	N/A	5/10-15/2012 SME meetings	State/Tribe/Territory users shall be required to be associated with the following program options: • Air only • NPDES only • Both Air and NPDES.	ICIS-Air version 1.0
21.	N/A	5/10-15/2012 SME meetings	LCON users shall be limited to the Air program.	ICIS-Air version 1.0
Sensitive Data Access				
22.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	Users shall be tracked as able to access sensitive data or not able to access sensitive data.	ICIS-Air version 1.0
23.	5.29.3	EPA SRS, 5/22/2012 Tier 3 Meeting	Only EPA HQ or Regional[15] system administrators with the Manage Sensitive Data Access function will be able to assign the sensitive data access privilege.	ICIS-Air version 1.0
Data Tracking Requirements				
Geography				
24.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall track the lowest level of geography with which a Facility or Activity is associated: • EPA Headquarters (HQ) • EPA Region – specify Region • State/Tribe/Territory – specify State/Tribe/Territory • Local Control Agency (LCON) – specify LCON	ICIS-Air version 1.0
25.	N/A	5/10-15/2012 SME meetings	The system shall track one and only one geography for a Facility or Activity.[16]	ICIS-Air version 1.0
Program				
26.	N/A	5/10-15/2012 SME meetings	The system shall track the program(s) associated with a record.	ICIS-Air version 1.0
27.	N/A	5/10-15/2012 SME meetings	The system shall determine sensitivity for records based on the EPA security policy. (Note: See Table 3.8-5 for the business rules for program identification at the time of writing)	ICIS-Air version 1.0

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[14] This will be a change from the existing FE&C approach of automatically allowing all EPA users to access all programs' data.

[15] This will be a change from the existing ICIS approach of allowing only EPA HQ users to manage sensitive data access.

[16] EPA is still determining portable sources policy, and an exemption from this requirement may be mandated after the policy is determined.

ID	Client Req ID	Source Reference	Requirement	Planned Release
28.	N/A	5/10-15/2012 SME meetings	The system shall require the following records to be associated with the Air program only: • Air Facility Interests • Air Permits • Alleged Violation Files • Woodstoves • Stack Tests • TV ACC • CEM/EER.	ICIS-Air version 1.0
29.	N/A	5/10-15/2012 SME meetings	The system shall require the following records to be associated with the NPDES program only: • NPDES Facility Interests • NPDES Permits • DMRs • NPDES Violations • Program Reports.	ICIS-Air version 1.0
30.	N/A	5/10-15/2012 SME meetings	The system shall require the following records to be associated with either the Air or NPDES program when the geography is State/Tribe/Territory: • Compliance Monitoring • Enforcement Actions.	ICIS-Air version 1.0
31.	N/A	5/10-15/2012 SME meetings	The system shall require the following records to be associated with the Air program when the geography is LCON: • Compliance Monitoring • Enforcement Actions.	ICIS-Air version 1.0
32.	N/A	5/10-15/2012 SME meetings	The system shall allow the following records to be associated with multiple programs when the geography is EPA HQ or Region: • Compliance Monitoring • Enforcement Actions • ADR • Voluntary Disclosure • Compliance Determination • Incidents • Compliance Assistance.	ICIS-Air version 1.0
Sensitivity				
33.	N/A	5/10-15/2012 SME meetings	The system shall track whether a record is sensitive.	ICIS-Air version 1.0
34.	N/A	5/10-15/2012 SME meetings	The following types of records shall never be sensitive: • Air Permits • NPDES Permits • Facilities (excluding Air Facility CMS records) • NPDES Violations • DMRs • Program Reports • Compliance Determination • ADR • Voluntary Disclosure • Compliance Assistance • Incidents.	ICIS-Air version 1.0
35.	N/A	5/10-15/2012 SME meetings	The system shall determine sensitivity for records based on the EPA security policy. (Note: See Table 3.8-4 for the business rules for sensitivity at the time of writing)	ICIS-Air version 1.0
36.	N/A	5/10-15/2012 SME meetings	The system shall allow the user to designate comments as sensitive or not sensitive.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
Function Requirements				
37.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall track functions that users are allowed to perform.	ICIS-Air version 1.0
38.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall track which users are able to assign each function.	ICIS-Air version 1.0
39.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall track which users are able to receive each function.	ICIS-Air version 1.0
40.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall track program limitations associated with functions (e.g., identifying functions that are Air only or NPDES only)	ICIS-Air version 1.0
41.	N/A		The system shall not allow users to create new functions through the application.	ICIS-Air version 1.0
Role Requirements				
42.	N/A	5/10-15/2012 SME meetings	The system shall group functions into roles.	ICIS-Air version 1.0
43.	5.29.4	EPA SRS, 5/10-15/2012 SME meetings	The system shall provide system roles which are uneditable by users.	ICIS-Air version 1.0
44.	5.29.3, 5.29.4	EPA SRS, 5/10-15/2012 SME meetings	They system shall allow HQ system administrators with the Add Role privilege to create new roles.	ICIS-Air version 1.0
45.	5.26.1, 5.26.2	EPA SRS, 5/10-15/2012 SME meetings	The system shall allow one or more roles to be assigned to a user.	ICIS-Air version 1.0
46.	N/A	6/21/2012 Comment Adjudication Meeting	The system shall allow one or more users to be assigned to a role.	ICIS-Air version 1.0
47.	5.26.1	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure roles with one or more Air only functions are only applied to users with the Air program.	ICIS-Air version 1.0
48.	5.26.1	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure roles with one or more NPDES only functions are only applied to users with the NPDES program.	ICIS-Air version 1.0
49.	5.29.3	EPA SRS, 5/10-15/2012 SME meetings	The system shall track which users are able to assign each role.	ICIS-Air version 1.0
50.	5.29.3	EPA SRS, 5/10-15/2012 SME meetings	The system shall track which users are able to receive each role.	ICIS-Air version 1.0
51.	N/A		If a user is assigned multiple roles, the user will be considered to have all the distinct functions for all the roles the user is assigned.	ICIS-Air version 1.0
Data Viewing Requirements				
52.	5.30.2	5/10-15/2012 SME meetings	The system shall allow all users to view all non-sensitive data according to the following rules regardless of the user/data geography and program: The application shall allow all users to view all non-sensitive data in modules to which they have access Reporting shall allow all users to report on all non-sensitive data in the reporting environment The databases shall allow all users to query all non-sensitive data	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
53.		5/10-15/2012 SME meetings	The system shall allow users with the sensitive data access privilege to view sensitive data if the user has the sensitive data privilege and their geography and program(s) match the data's geography and program[17].	ICIS-Air version 1.0
Data Update Requirements				
54.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall determine whether a user can update a record by comparing the following dimensions for the user and the record: • Geography • Program • Sensitive Data Access • User functions.	ICIS-Air version 1.0
55.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure that only users with the Add function for a module are allowed to add new entities in that module.	ICIS-Air version 1.0
56.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall prevent entry of new sensitive data records by users without the sensitive data privilege in all modules with sensitive data.	ICIS-Air version 1.0
57.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure that only users with the Edit function for a module are allowed to edit entities in that module.	ICIS-Air version 1.0
58.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure that only users with the Delete function for a module are allowed to delete entities in that module.	ICIS-Air version 1.0
59.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure that only users with the Link/Unlink function for a module are allowed to link or unlink entities to and from that module.	ICIS-Air version 1.0
60.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	The system shall ensure that only users with the Facility CMS function will be able to update Facility CMS data.	ICIS-Air version 1.0

61.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	A user shall be allowed to edit non-sensitive data under the following conditions[18]:
			• EPA HQ data
			  – The user is an EPA HQ user
			  – The user has the function to allow the user to update the data
			  – The user has the program to allow the user to update the data
			• EPA Regional data
			  – The user is an EPA HQ user or is an EPA regional user for the data's region
			  – The user has the function to allow the user to update the data
			  – The user has the program to update the data
			• State/Tribal/Territory data
			  – The user is an EPA HQ user or is an EPA regional user for the data's state or is a State/Tribal/Territory user for the data's state, tribe, or territory
			  – The user is a State/Tribal/Territory user and the user's program matches the data's program
			  – The user has the function to allow the user to update the
				ICIS-Air version 1.0

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[17] Note: the ICIS sensitive data policy is currently being reviewed by EPA and will not be finalized in time for incorporation in the requirements documents. The detailed design (Task 4) will incorporate those requirements.

[18] This is a change from current EPA policy of allowing all EPA users to access data regardless of program.

ID	Client Req ID	Source Reference	Requirement	Planned Release

			data
			• LCON data
			  – The user is an EPA HQ user or is an EPA regional user for the data's or is the LCON user for the data's LCON
			  – The user is a State/Tribal/Territory user and the user's program matches the data's program and the user has the function allowing the user to update its state's LCONs' data
			  – The user is an LCON user and the user's program matches the data's program
			  – The user has the function to allow the user to update the data	

62.	5.2.5	EPA SRS, 5/10-15/2012 SME meetings	A user shall be allowed to edit non-sensitive data if the user's geography, program, and function match the data's geography and program.	ICIS-Air version 1.0
63.		5/10-15/2012 SME meetings	A state user shall only be able to update LCON data if: • The user meets the function and sensitive data requirements of the LCON data • The LCON is associated with the user's state • The user has the Ability to update LCON data function	ICIS-Air version 1.0
64.	5.26.5	EPA SRS	CAA AFS User Roles are defined as (but are not limited to): (See list in Table 3.8-7)	ICIS-Air version 1.0

Table 3.8-4 lists the business rules for determining enforcement sensitivity at the time of writing.

Table 3.8-4. Current Sensitive Data Business Rules

Module	Sensitivity Rule
General	Air-related module comments can be manually flagged by the user as sensitive or non-sensitive; these will default to sensitive.

Facility	Basic Facility data are never sensitive
	• Specific data elements on the CMS record are sensitive[19]:
	  – Frequency
	  – Effective Frequency
	  – Next FCE Due Date
	  – CMS Effective Date
	  – Planned Evaluation Fiscal Year
	  – Planned Evaluation On or Off Site Visit
	  – Planned Evaluation Comments

Compliance Monitoring Activities (excluding Investigations)	Any activity with only planned start and/or end date but no actual start and/or end date is sensitive
Compliance Monitoring Activity- Investigations	Any investigation with blank actual end date is sensitive
Informal Enforcement Action	Informal EAs identified as sensitive will be sensitive • Informal EAs may be identified as sensitive either through a flag on the EA type or through a user-entered sensitive data indicator; details to be determined during design

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[19] EPA may reevaluate this list

Module	Sensitivity Rule
Formal Enforcement Actions	• Referrals are always sensitive • Formal Judicial EAs are sensitive until a Complaint is filed with the court • Formal Administrative EAs are sensitive until a Complaint is filed with the court or a Final Order is issued, whichever comes first • Big Case Projection data are sensitive (EPA only) • Enforcement Case Summary is not sensitive on its own, but is sensitive when entire EA is sensitive • EA sensitive comments are always sensitive regardless of sensitivity status of EA itself
Alleged Violation Files	Sensitive until linked to a non-sensitive notice, addressing, or resolving activity OR user manually sets to non-sensitive
Air Permits	Basic Permit data are never sensitive • Has sensitive comments like all Air modules
Voluntary Disclosure	Sensitive when Date of Resolution is blank
Modules that are never sensitive	Modules that are never sensitive and have no sensitive comments • NPDES Permits • NPDES Violations • DMRs • Program Reports • Compliance Determination • ADR • Voluntary Disclosure • Compliance Assistance • Incidents.

Table 3.8-5 lists the business rules for determining what program data belong to at the time of writing.

Table 3.8-5. Current Program Identification Business Rules

Data Family	Program Identification Business Rule
Facilities	Facilities will be Air facilities if pgm_sys_acrnm = <Air> Facilities will be NPDES facilities if pgm_sys_acrnm = NPDES All users will be able to update ICIS and non-ICIS/non-NPDES/non-Air (NINN) interests Facilities will be created as Air or NPDES or ICIS or NINN interests and cannot be changed
Compliance Monitoring	Non-EPA CM activities: • Air activities if the associated facility is an Air Facility • NPDES activities if the associated facility is a NPDES Facility • Must be created as Air or NPDES and cannot be changed EPA EA activities: • TBD[20]
Enforcement Actions	Non-EPA EA activities: • Air activities if the associated facilit(ies) are Air Facilities • NPDES activities if the associated facilities are NPDES Facilities • Must be created as Air or NPDES and cannot be changed EPA EA activities: • TBD[21]
Alleged Violation Files	Alleged Violation Files are always Air-only activities
Air Permits	Air Permits are always Air-only activities
NPDES Only Activities	NPDES Permits, DMRs, NPDES Violations, and Program Reports

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[20] Rules pending EPA determination of policy of who can add and remove interests of different types to activities if the user does not have all the programs.

[21] Rules pending EPA determination of policy of who can add and remove interests of different types to activities if the user does not have all the programs.

Data Family	Program Identification Business Rule
EPA Multimedia Activities	ADR, Voluntary Disclosure, Compliance Determination, Incidents, and Compliance Assistance are always EPA only activities and can be associated with multimedia facilities

Table 3.8-6 lists the notional Air-related functions for ICIS-Air. The columns have the following meanings:

- **Module:** Name of the module to which the function belongs.
- **Function Description:** Description of the function.
- **Assigner Type:** Lowest level of user allowed to assign the function:
  - HQ: only EPA HQ users can assign the function
  - REG: EPA HQ and EPA Regional users can assign the function
- **Assignee Type**: Lowest level of users allowed to receive the function:
  - HQ: only EPA HQ users can receive the function
  - REG: EPA HQ and EPA Regional users can receive the function
  - ST: EPA HQ, EPA Regional, and State/Tribal/Territory users can receive the function
  - LC: EPA HQ, EPA Regional, State/Tribal/Territory, and LCON users can receive the function
- **Program Limitation:** Indicates whether the function is an Air-only function
- **Comment:** Additional information about the function

The data in blue indicate changes specifically to support Air functionality.

Table 3.8-6. Notional Air-Related Functions for ICIS-Air

Module	Function Description	Assigner Type	Assignee Type	Program Limitation	Comment
FACILITY	Add Facility	REG	ST/DA		
FACILITY	Edit Facility	REG	ST/DA		
FACILITY	Delete Facility	REG	ST/DA		Awaiting business rules on deletion from EPA
FACILITY	Mass Delete Facility - Batch function only	REG	ST/DA		Deletes facility and all its children
FACILITY	Manage CMS	REG	ST/DA	Air	
FACILITY	Add Wood Stove Certification	REG	REG	Air	
FACILITY	Edit Wood Stove Certification	REG	REG	Air	
FACILITY	Delete Wood Stove Certification	REG	REG	Air	
COMPLIANCE MONITORING	Add Compliance Monitoring	REG	ST/DA		Will apply to all CM activities, including stack tests, TV ACC, PCE, FCE, Investigation, Information Requests
COMPLIANCE MONITORING	Edit Compliance Monitoring	REG	ST/DA		
COMPLIANCE MONITORING	Link/Unlink Compliance Monitoring	REG	ST/DA		
COMPLIANCE MONITORING	Delete Compliance Monitoring	REG	ST/DA		
INFORMAL	Add Informal Enforcement Action	REG	ST/DA		

Module	Function Description	Assigner Type	Assignee Type	Program Limitation	Comment
ENFORCEMENT ACTION					
INFORMAL ENFORCEMENT ACTION	Edit Informal Enforcement Action	REG	ST/DA		
INFORMAL ENFORCEMENT ACTION	Link/Unlink Informal Enforcement Action	REG	ST/DA		
INFORMAL ENFORCEMENT ACTION	Delete Informal Enforcement Action	REG	ST/DA		
FORMAL ENFORCEMENT ACTION	Add/Copy Formal Enforcement Action	REG	ST/DA		
FORMAL ENFORCEMENT ACTION	Edit Formal Enforcement Action	REG	ST/DA		
FORMAL ENFORCEMENT ACTION	Link/Unlink Formal Enforcement Action	REG	ST/DA		
FORMAL ENFORCEMENT ACTION	Delete Formal Enforcement Action	REG	ST/DA		
ALLEGED VIOLATION FILES	Add Alleged Violation File	REG	ST/DA	Air	
ALLEGED VIOLATION FILES	Edit Alleged Violation File	REG	ST/DA	Air	
ALLEGED VIOLATION FILES	Delete Alleged Violation File	REG	ST/DA	Air	
ALLEGED VIOLATION FILES	Link/Unlink Alleged Violation File	REG	ST/DA	Air	
AIR PERMIT	Add Air Permit	REG	ST/DA	Air	
AIR PERMIT	Edit Air Permit	REG	ST/DA	Air	
AIR PERMIT	Delete Air Permit	REG	ST/DA	Air	
ICISBATCH	Manage Batch Processing	HQ	HQ		
ICISBATCH	Retrieve Batch Status Messages	HQ	HQ		
ICISBATCH	Send Batch Processing Report to CDX	HQ	HQ		
SYSTEM ADMINISTRATOR	Manage Users	HQ	REG		
SYSTEM ADMINISTRATOR	Manage Roles	HQ	HQ		
SYSTEM ADMINISTRATOR	Manage Reference Tables	HQ	HQ		Assuming will include wood stoves manufacturers, MDRs, LCON lists and all Air-related reference tables
SYSTEM ADMINISTRATOR	Manage Government Contacts (Offices/Organizations)	HQ	REG		

Module	Function Description	Assigner Type	Assignee Type	Program Limitation	Comment
SYSTEM ADMINISTRATOR	Manage Sensitive Data Access	HQ	REG[22]		
SYSTEM ADMINISTRATOR	Add/Edit News and Alerts	HQ	HQ		
SYSTEM ADMINISTRATOR	View Audit Logs (for system programs)	HQ	HQ		
SYSTEM ADMINISTRATOR	Ability for State user to update LCON data	HQ	ST/DA	Air	
SYSTEM ADMINISTRATOR	Manage Subscriptions	REG	ST/DA		
SYSTEM ADMINISTRATOR	Manage RNC and DMR-Non Receipt Flags	HQ	HQ		

Table 3.8-7 lists the notional roles for ICIS-Air. Each role lists the name, description, assigner type, assignee type, and notional functions to be associated with that row.

Table 3.8-7. Notional Roles for ICIS-Air

DA Air Editor: allows DA user to touch all air data and perform all deletes except facility.   Assigner Type: REG   Assignee Type: ST/DA
Add Facility
Edit Facility
Add Compliance Monitoring
Edit Compliance Monitoring
Link/Unlink Compliance Monitoring
Delete CM Activity
Add Informal Enforcement Action
Edit Informal Enforcement Action
Link/Unlink Informal Enforcement Action
Delete Informal Enforcement Action
Add/Copy Formal Enforcement Action
Edit Formal Enforcement Action
Link/Unlink Formal Enforcement Action
Delete Formal Enforcement Action
Add Alleged Violation File
Edit Alleged Violation File
Link/Unlink Alleged Violation File
Delete Alleged Violation File
Add Air Permit
Edit Air Permit
Delete Air Permit

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[22] Change to current ICIS policy allowing only HQ users to manage sensitive data access.

DA Air Power Editor: allows DA user to do everything the DA air editor can do as well as facility delete and manage CMS data. (user should be given sensitive data access as well) Assigner Type: REG Assignee Type: ST/DA
Add Facility
Edit Facility
Add Compliance Monitoring
Edit Compliance Monitoring
Link/Unlink Compliance Monitoring
Delete CM Activity
Add Informal Enforcement Action
Edit Informal Enforcement Action
Link/Unlink Informal Enforcement Action
Delete Informal Enforcement Action
Add/Copy Formal Enforcement Action
Edit Formal Enforcement Action
Link/Unlink Formal Enforcement Action
Delete Formal Enforcement Action
Add Alleged Violation File
Edit Alleged Violation File
Link/Unlink Alleged Violation File
Delete Alleged Violation File
Add Air Permit
Edit Air Permit
Delete Air Permit
Delete/Mass Delete Facility
Manage CMS

State LCON Editor: Adds ability for a state user to update LCON data - can only be given to a state user Assigner Type: REG Assignee Type: ST
ABILITY FOR STATE USERS TO UPDATE LCON DATA

EPA Air Editor: allows EPA user to do everything DA Air Editor can do plus EPA only functions - role can only be assigned to EPA users Assigner Type: REG Assignee Type: REG
Add Facility
Edit Facility

Add Compliance Monitoring
Edit Compliance Monitoring
Link/Unlink Compliance Monitoring
Delete CM Activity
Add Informal Enforcement Action
Edit Informal Enforcement Action
Link/Unlink Informal Enforcement Action
Delete Informal Enforcement Action
Add/Copy Formal Enforcement Action
Edit Formal Enforcement Action
Link/Unlink Formal Enforcement Action
Delete Formal Enforcement Action
Add Alleged Violation File
Edit Alleged Violation File
Link/Unlink Alleged Violation File
Delete Alleged Violation File
Add Air Permit
Edit Air Permit
Delete Air Permit
Add Compliance Determination
Edit Compliance Determination
Link/Unlink Compliance Determination
Delete Compliance Determination
Add Alternate Dispute Resolution
Edit Alternate Dispute Resolution
Link/Unlink Alternate Dispute Resolution
Delete Alternate Dispute Resolution
Add Compliance Assistance (Actual)
Edit Compliance Assistance (Actual)
Link/Unlink Compliance Assistance (Actual)
Delete Compliance Assistance (Actual)
Add Compliance Assistance (Planning)
Edit Compliance Assistance (Planning)
Link/Unlink Compliance Assistance (Planning)
Delete Compliance Assistance (Planning)
Add Incident
Edit Incident
Link/Unlink Incident
Delete Incident
Add Voluntary Disclosure
Edit Voluntary Disclosure
Link/Unlink Voluntary Disclosure
Delete Voluntary Disclosure

EPA Air Power Editor: allows EPA user to do everything the EPA air editor can do as well as facility delete and manage CMS data. (user should be given sensitive data access as well) - role can only be assigned to EPA users

Assigner Type: REG
Assignee Type: REG

Add Facility
Edit Facility
Add Compliance Monitoring
Edit Compliance Monitoring
Link/Unlink Compliance Monitoring
Delete CM Activity
Add Informal Enforcement Action
Edit Informal Enforcement Action
Link/Unlink Informal Enforcement Action
Delete Informal Enforcement Action
Add/Copy Formal Enforcement Action
Edit Formal Enforcement Action
Link/Unlink Formal Enforcement Action
Delete Formal Enforcement Action
Add Alleged Violation File
Edit Alleged Violation File
Link/Unlink Alleged Violation File
Delete Alleged Violation File
Add Air Permit
Edit Air Permit
Delete Air Permit
Add Compliance Determination
Edit Compliance Determination
Link/Unlink Compliance Determination
Delete Compliance Determination
Add Alternate Dispute Resolution
Edit Alternate Dispute Resolution
Link/Unlink Alternate Dispute Resolution
Delete Alternate Dispute Resolution
Add Compliance Assistance (Actual)
Edit Compliance Assistance (Actual)
Link/Unlink Compliance Assistance (Actual)
Delete Compliance Assistance (Actual)
Add Compliance Assistance (Planning)
Edit Compliance Assistance (Planning)
Link/Unlink Compliance Assistance (Planning)
Delete Compliance Assistance (Planning)
Add Incident
Edit Incident
Link/Unlink Incident

Delete Incident
Add Voluntary Disclosure
Edit Voluntary Disclosure
Link/Unlink Voluntary Disclosure
Delete Voluntary Disclosure
Delete/Mass Delete Facility
Manage CMS

EPA Wood Stoves Editor: Adds ability for an EPA user to manage wood stoves data Assigner Type: HQ Assignee Type: REG
Add Wood Stove Certification
Edit Wood Stove Certification
Delete Wood Stove Certification

EPA Regional Air System Administrator: Role can only be applied to EPA regional user Assigner Type: HQ Assignee Type: REG
Manage Users
Manage Government Contacts
Management of Sensitive Data Access
View Audit Logs

EPA HQ Air System Administrator: Role can only be applied to EPA HQ user Assigner Type: HQ Assignee Type: HQ
Manage Users
Manage Roles
Manage Reference Tables
Manage Government Contacts
Management of Sensitive Data Access
Add/Edit News and Alerts
View Audit Logs
Management of Subscriptions
Manage Batch Processing
Retrieve GBatch Status Messaging
Send Batch Processing Report to CDX

Security Appendix A: Notional User Profile Form

This appendix provides notional user profile form content that could be integrated into the application.

Rules to be implemented:

- Today's Date cannot be a future date
- User can choose only one Add/Change/Delete option
- State must be valid
- User can select only one User Geography option; if any option besides EPA HQ is selected, the user must enter one valid EPA Region or State/Tribe/Territory or LCON
- User can select only one program choice
- User can select only one primary means of data submission
- User can select multiple roles, subject to the following restrictions:
  - If geography is State/Tribe/Territory or LCON, only Delegated Agency User roles can be selected
  - If geography is EPA HQ or EPA Region, no Delegated Agency roles can be selected
  - If geography is EPA Region, the EPA HQ System Administrator role cannot be selected

3.9   SYSTEM ADMINISTRATION

System Administration allows management of users, lists maintenance, and oversight functionality that allow a level of control through the user interface that would otherwise require intervention of database administrators to control user access and update reference lists as needed.

3.9.1   Summary of System Administration Modernization in ICIS-Air

Some System Administration functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs and changing technologies. Additionally, some existing ICIS System Administration functionality has been updated to meet Air needs. The following two sections summarize these changes.

3.9.1.1   *Summary of Modernization from Legacy AFS*

- **Functionality-based Roles**
  Legacy AFS had some special function access at both the general user levels and at the system administration level. ICIS-Air access functions will be defined at a granular level, with pre-defined roles that group functions into logical groupings to allow easy assignment during user administration and reduce the number of custom utilities required. Custom roles also can be defined.

- **User Administration**
  In Legacy AFS, EPA administers all user access. In ICIS-Air, all users will be able to update their own passwords and profiles[23]. If the User Administrator is an Air-Only user, then any new user account they create can be defaulted to Air access in ICIS.

- **Contacts and Addresses**
  ICIS-Air will have a reusable contact list that allows users to select inspectors, staff, etc., on actions or activities without reentering all of the individual's contact information each time. This also will allow central update of a user's contact information when phone numbers, etc., change. Government contacts are identified by:
  - Organization: The unique name of the organization (e.g., U.S. EPA).
  - Office: The unique name of the office within an organization (e.g., Office of Air and Radiation (OAR)).

  Instead of adding address information per individual, once a Contact's Office is selected, the address for that Office will be displayed. Office maintenance also will include:
  - Office Type: whether federal, regional, state/tribe/territory, or local
  - Agency: If part of the federal government, the name of the agency to which the organization belongs.

- **Reference Table Administration**
  System Administrators will be able to update values for reference lists that are used as selection values through the graphical user interface (GUI) or as validation values for electronic/batch submissions.

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[23] How user administration is implemented will change when ICIS moves to Single Sign On (SSO). Sufficient time will need to be allocated in Task 4 to allow coordination between the ICIS O&M and ICIS-AFS teams when it happens.

- **News & Alerts**

   All users will be able to view News & Alerts either in list form, or subscribe to view specific categories of News & Alerts on the home page. System Administrators will be able to select category(ies) when entering a new News/Alerts item.

3.9.1.2 *Summary of Changes to ICIS to Support Air*

- **User Administration**

   In ICIS-Air, users will need to be specifically associated with the Air and NPDES programs, rather than just assumed to have access. The program association will be used to filter to which roles the user may be assigned and which data they may access. This program-level association will apply to both EPA and Delegated Agency users.

   An additional level of access will be added for Local Control Agencies, called LCONs. LCON users will be Air-only, and will have access to some or all counties in a given State.

   Currently in ICIS, geographic access is hierarchical (see Security module); in ICIS-Air, not all State users will have edit access to the LCONs within the State. A new privilege will be added to allow a State User to edit LCON data.

   Additionally, Primary mode of data entry will be listed (i.e., online or batch) to assist in assessing system usage; users will not be limited to this mode of data entry.

- **User Search**

   Any user will be able to do a lookup of other users and see read only results, regardless of whether they have the Manage User privilege. In current ICIS, users can only see their own information if they do not have the Manage User privilege.

- **Functions/Roles**

   New Functions and Roles are defined in the Security module. Assignment of the Functions to a Role and Roles to Users will not change, with the exception of the Program-Role relationship mentioned above.

- **Contacts**

   In ICIS currently, only government contacts are reusable. In ICIS-Air, Contacts will be expanded to include reusable non-government contacts. Government contacts will have an additional field for LCON. Additionally, all contacts will be associated with one or more Programs: FE&C, Air, and NPDES.

   Non-system administrator users will be able to add non-government contacts to the reference table at the point of data entry (e.g., from the "Manage Contacts" option on an activity page) if needed.

- **Offices**

   Offices also will have an additional field for LCON.

- **Reference Table Maintenance**

   Additional tables will be included for System Administrator management. The full list of tables and fields is yet to be determined.

- **News & Alerts**

   News & Alerts will be expanded to include Program options: System-wide, FE&C, Air, and NPDES. Users will be able to subscribe to which News & Alerts they would like to see.

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support System Administration in ICIS-Air.

3.9.2   System Administration Functional Requirements

Table 3.9-1 lists the requirements that apply to System Administration. It includes functions that are allowed and business rules within a function.

Table 3.9-1. ICIS-Air System Administration Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
User Administration				
Search Users				
1.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to search for a User by populating any one of the following fields or combination of fields: • User ID • First Name • Last Name • Organization • Office • E-mail Address • Region • State/Tribe/Territory • LCON • Status • Air Program Access • NPDES Program Access.	ICIS-Air version 1.0
2.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Users presented in a search results list.	ICIS-Air version 1.0
3.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the User Search results: • UserID • User Name (First Name and Last Name) • Region • State/Tribe/Territory • LCON • Phone • Email • Status	ICIS-Air version 1.0
4.	N/A	April 25, 2012 SME Meeting	The system shall allow the authorized user to select a user from the search results to edit.	ICIS-Air version 1.0
5.	N/A		The system shall allow non-authorized users to view the following details of other users: • User ID • First Name • Last Name • Organization • Office • E-mail Address • Region • State/Tribe/Territory • LCON	ICIS-Air version 1.0
Add User				
6.	N/A	April 25, 2012 SME Meeting	The system shall allow authorized users to add a new User.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

7.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Add User screen:
			• User ID
			• Data Access Level
			  – HQ
			  – Region (specify)
			  – State/Tribe (specify)
			  – LCON (specify)
			• Data Access Privileges
			  – Sensitive Data Access
			  – Air Program Access
			  – NPDES Program Access
			• Primary Data Entry
			  – Online
			  – Electronic Submission
			• Status
			  – Active or Inactive
			• First Name
			• Middle Initial
			• Last Name
			• Organization
			• Office
			• Telephone Number
			• Fax
			• Cell Phone Number
			• E-mail Address.
				ICIS-Air version 1.0

8.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields to add a new User:
			• User ID
			• Data Access Level (select one)
			  – HQ
			  – Region (specify)
			  – State/Tribe/Territory (specify)
			  – LCON (specify)
			• Status
			  – Active or Inactive
			• First Name
			• Last Name
			• Organization
			• Office
			• Telephone Number
			• E-mail Address.
				ICIS-Air version 1.0

9.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to assign Roles to the user.	ICIS-Air version 1.0
Edit User				
10.	N/A	April 25, 2012 SME Meeting	The system shall allow authorized users to edit an existing User that is not themself.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

11.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Edit User screen:
			• User ID
			• Data Access Level
			  – HQ
			  – Region (specify)
			  – State/Tribe (specify)
			  – LCON (specify)
			• Data Access Privileges
			  – Sensitive Data Access
			  – Air Program Access
			  – NPDES Program Access
			• Primary Data Entry
			  – Online
			  – Electronic Submission
			• Status
			  – Active or Inactive
			• First Name
			• Middle Initial
			• Last Name
			• Organization
			• Office
			• Telephone Number
			• Fax
			• Cell Phone Number
			• E-mail Address
			• Street Address
			• City
			• State
			• County
			• Zip Code
			• Mail Code
			• Application Roles
			• Created By
			• Created Date
			• Last Modified By
			• Last Modified Date.
				ICIS-Air version 1.0

12.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Edit User screen: • User ID • Data Access Level • Street Address • City • State • County • Zip Code • Mail Code • Created By • Created Date • Last Modified By • Last Modified Date.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
13.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing a user: • User ID • Status – Active or Inactive (Defaults to Active) • First Name • Last Name • Organization • Office • Telephone Number • E-mail Address.	ICIS-Air version 1.0
14.	5.21.1	EPA SRS, April 25, 2012 SME Meeting	The system shall allow the user to add and remove Roles.	ICIS-Air version 1.0
Reset Password for Others				
15.	5.21.1	EPA SRS, April 25, 2012 SME Meeting	The System shall allow authorized users to reset passwords for other users.	ICIS-Air version 1.0
16.	5.21.1	EPA SRS, April 25, 2012 SME Meeting	The system shall display the following data elements on the Reset User Password screen: • User ID • New Password • Confirm New Password.	ICIS-Air version 1.0
17.	5.21.1	EPA SRS, April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing a User Password: • User ID • New Password • Confirm New Password.	ICIS-Air version 1.0
18.	N/A	April 25, 2012 SME Meeting	The system shall require the 'New Password' field to match the 'Confirm New Password' field when changing a User's Password.	ICIS-Air version 1.0
19.	N/A	April 25, 2012 SME Meeting	The system shall require the 'New Password' to meet the ICIS password requirements (see Security for details).	ICIS-Air version 1.0
My Profile				
20.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to edit their own User Profile.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
21.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the My Profile screen: • User ID (display only) • Current Data Access Level (specify) (display only) – HQ – Region (specify) – State/Tribe (specify) – LCON (specify) • First Name • Middle Initial • Last Name • Organization • Office • Telephone Number • Fax • Cell Phone Number • E-mail Address • Street Address • City • State • County • Zip Code • Mail Code • Created By • Created Date • Last Modified By • Last Modified Date.	ICIS-Air version 1.0
22.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Edit User screen: • User ID • Street Address • Data Access Level • City • State • County • Zip Code • Mail Code • Created By • Created Date • Last Modified By • Last Modified Date.	ICIS-Air version 1.0
23.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing a user: • User ID • Status – Active or Inactive • First Name • Last Name • Organization • Office • Telephone Number • E-mail Address.	ICIS-Air version 1.0
Change My Password				
24.	N/A	April 25, 2012 SME Meeting	The System shall allow the user to reset their own password.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
25.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Change My Password screen: • Old Password • New Password • Confirm New Password.	ICIS-Air version 1.0
26.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing a User Password: • Old Password • New Password • Confirm New Password.	ICIS-Air version 1.0
27.	N/A	April 25, 2012 SME Meeting	The system shall require the 'Old Password' to match the user's current password.	ICIS-Air version 1.0
28.	N/A	April 25, 2012 SME Meeting	The system shall require the 'New Password' field to match the 'Confirm New Password' field when changing a User's Password.	ICIS-Air version 1.0
29.	N/A	April 25, 2012 SME Meeting	The system shall require the 'New Password' to meet the ICIS password requirements (See Security for details).	ICIS-Air version 1.0
Role Administration				
List Roles				
30.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to view existing System Roles.	ICIS-Air version 1.0
31.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Roles presented in the list.	ICIS-Air version 1.0
32.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the List Roles results: • Role Name • Role Description.	ICIS-Air version 1.0
33.	N/A	April 25, 2012 SME Meeting	The system shall have an option to add a new custom role.	ICIS-Air version 1.0
34.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to select a custom role to edit.	ICIS-Air version 1.0
35.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to delete custom roles.	ICIS-Air version 1.0
36.	N/A	April 25, 2012 SME Meeting	The system shall not allow the user to delete a custom role to which any users have been assigned.	ICIS-Air version 1.0
37.	N/A	April 25, 2012 SME Meeting	The system shall not allow the user to edit or delete System Roles.	ICIS-Air version 1.0
Add Roles				
38.	N/A	April 25, 2012 SME Meeting	The System shall allow the user to add a custom role.	ICIS-Air version 1.0
39.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Add a New Role screen: • Role Name • Role Description • System Access Functions.	ICIS-Air version 1.0
40.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when Adding a New Role: • Role Name • Role Description.	ICIS-Air version 1.0
41.	N/A	April 25, 2012 SME Meeting	The system shall require the user to select one or more Functions to assign to the role when adding.	ICIS-Air version 1.0
42.	N/A		The system shall have a "Select All" option for each Function grouping.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
Edit Roles				
43.	N/A	April 25, 2012 SME Meeting	The System shall allow the user to edit a custom role.	ICIS-Air version 1.0
44.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on Edit Role screen: • Role Name • Role Description • System Access Functions • Created By • Created Date • Last Modified By • Last Modified Date.	ICIS-Air version 1.0
45.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Edit User screen: • Created By • Created Date • Last Modified By • Last Modified Date.	ICIS-Air version 1.0
46.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when Editing a Role: Role Description.	ICIS-Air version 1.0
47.	N/A	April 25, 2012 SME Meeting	The system shall require the user to select one or more System Access Functions to assign to the role when editing.	ICIS-Air version 1.0
Contacts Maintenance				
Search Contacts				

48.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to search for a Contact by populating any one of the following fields or combination of fields:
			• First Name
			• Last Name
			• E-mail Address
			• Region
			• State/Tribe
			• LCON
			• Organization
			• Office
			• Government Only
			• Non-Government Only
			• Program Association
			  – FE&C
			  – Air
			  – NPDES.
				ICIS-Air version 1.0

49.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Contacts presented in a search results list.	ICIS-Air version 1.0
50.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the Contacts Search results: • First Name • Last Name • Region • State • Government • Organization • Office.	ICIS-Air version 1.0
51.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to select a Contact from the search results to edit.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
Add Contact				
52.	N/A	April 25, 2012 SME Meeting	The system shall allow the authorized user to add a new Contact.	ICIS-Air version 1.0
53.	N/A	June 26, 2012 SME Meeting	The system shall allow a user with Add or Edit Facility, Compliance Monitoring, Alleged Violation File, or Enforcement Action privileges to add a new non-Government contact.	ICIS-Air version 1.0
54.	N/A	June 26, 2012 SME Meeting	The system shall default the Program Association of a new non-Government contact to the Program(s) of the non-system administrator user entering the record.	ICIS-Air version 1.0

55.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Add Contact screen:
			• First Name
			• Middle Initial
			• Last Name
			• Telephone Number
			• Fax
			• E-mail Address
			• Cell Phone Number
			• Title
			• Region
			• State/Tribe
			• Organization
			• Office
			• LCON
			• Program Association
			  – FE&C
			  – Air
			  – NPDES.
				ICIS-Air version 1.0

56.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields to add a new Contact:
			• First Name
			• Last Name
			• Telephone Number
			• E-mail Address
			• Organization (Government Contact only)
			• Office (Government Contact only)
			• Program Association
			  – FE&C
			  – Air
			  – NPDES.
				ICIS-Air version 1.0

57.	N/A	April 25, 2012 SME Meeting	The system shall not allow the user to add a new contact if the E-mail address exists for another Contact.	ICIS-Air version 1.0
Edit Contact				
58.	N/A	April 25, 2012 SME Meeting	The system shall allow the authorized user to edit an existing Contact.	ICIS-Air version 1.0
59.	N/A	June 26, 2012 SME Meeting	The system shall allow a user with Add or Edit Facility, Compliance Monitoring, Alleged Violation File, or Enforcement Action privileges to edit a new non-Government contact.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

60.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Edit Contact screen:
			• First Name
			• Middle Initial
			• Last Name
			• Telephone Number
			• Fax
			• E-mail Address
			• Cell Phone Number
			• Title
			• Region
			• State/Tribe
			• Organization
			• Office
			• LCON
			• Program Association
			  – FE&C
			  – Air
			  – NPDES
			• Created By
			• Created Date
			• Last Modified By
			• Last Modified Date.
				ICIS-Air version 1.0

61.	N/A	April 25, 2012 SME Meeting	The system shall display the following fields as read-only when editing a Contact: • Created By • Created Date • Last Modified By • Last Modified Date	ICIS-Air version 1.0
62.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing a Contact: • First Name • Last Name • Telephone Number • E-mail Address • Organization (Government Contact Only) • Office (Government Contact Only)	ICIS-Air version 1.0
63.	N/A		The system shall ensure that the email address for the contact is unique in the system on edit.	ICIS-Air version 1.0
Search Offices				
64.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to search for an Office by populating any one of the following fields or combination of fields: • Office Name • Office Type • Agency • Region • State/Tribe/Territory • LCON.	ICIS-Air version 1.0
65.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Offices presented in a search results list.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
66.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the Office Search results: • Office Name • Office Type • Agency • LCON • State/Tribe/Territory • Region.	ICIS-Air version 1.0
67.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to select an Office from the search results to edit.	ICIS-Air version 1.0
68.	N/A	April 25, 2012 SME Meeting	The system shall provide an option for the user to add a new office.	ICIS-Air version 1.0
Add Office				
69.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to add a new Office.	ICIS-Air version 1.0
70.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Add Office screen: • Office Name • Office Type • Address 1 • Address 2 • City • State • Zip Code • County • Country • Building • Room Number • Province • Region • LCON • Agency.	ICIS-Air version 1.0

71.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields to add a new Office:
			• Office Name
			• Office Type
			• One of the following:
			  – LCON
			  – State
			  – Region.
				ICIS-Air version 1.0

Edit Office				
72.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to edit an existing Office.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
73.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Edit Office screen: • Office Name • Office Type • Address 1 • Address 2 • City • State • Zip Code • County • Country • Building • Room Number • Province • Region • LCON • Agency • Created By • Created Date • Last Modified Date • Last Modified By.	ICIS-Air version 1.0
74.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Edit Office screen: • Created By • Created Date • Last Modified Date • Last Modified By.	ICIS-Air version 1.0
75.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing an Office: • Office Name • Office Type • One of the following: – LCON – State – Region.	ICIS-Air version 1.0
Search Organizations				
76.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to search for an Organization by populating the following field: • Organization.	ICIS-Air version 1.0
77.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Organizations presented in a search results list.	ICIS-Air version 1.0
78.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the Organization Search results: • Organization.	ICIS-Air version 1.0
79.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to select an Organization from the search results to edit.	ICIS-Air version 1.0
Add Organization				
80.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to add a new Organization.	ICIS-Air version 1.0
81.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Add Organization screen: • Organization Name.	ICIS-Air version 1.0
82.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields to add a new Organization: • Organization Name.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
83.	N/A	April 25, 2012 SME Meeting	The system shall not allow the user to add a New Organization if an Organization already exists with that name.	ICIS-Air version 1.0
Edit Organization				
84.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to edit an existing Organization.	ICIS-Air version 1.0
85.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Edit Organization screen: • Organization Name • Created By • Created Date • Last Modified Date • Last Modified By.	ICIS-Air version 1.0
86.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Edit Organization screen: • Created By • Created Date • Last Modified Date • Last Modified By.	ICIS-Air version 1.0
87.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing an Organization: • Organization Name.	ICIS-Air version 1.0
88.	N/A	April 25, 2012 SME Meeting	The system shall not allow the user to edit an Organization Name if an Organization already exists with the new name.	ICIS-Air version 1.0
Reference Table Maintenance				
89.	5.4.2, 5.4.5	EPA SRS, April 25, 2012 SME Meeting	The system shall allow the user to add values to reference tables[24].	ICIS-Air version 1.0
90.	5.4.2, 5.4.5	EPA SRS, April 25, 2012 SME Meeting	The system shall allow the user to edit values in reference tables, provided the edit does not invalidate existing data.	ICIS-Air version 1.0
91.	5.4.2, 5.4.5	EPA SRS, April 25, 2012 SME Meeting	The system shall allow the user to mark values in reference tables as inactive.	ICIS-Air version 1.0
92.	5.4.2, 5.4.5	EPA SRS, April 25, 2012 SME Meeting	The system shall allow the user to delete a value from reference tables if that value is not being used.	ICIS-Air version 1.0
LCON				
93.	N/A	May 10-15, 2012 SME Meetings	The system shall track the state and counties associated with each LCON.	ICIS-Air version 1.0
94.	N/A	May 10-15, 2012 SME Meetings	The system shall require each LCON to be associated with one and only one state.	ICIS-Air version 1.0
95.	N/A	May 10-15, 2012 SME Meetings	The system shall require each LCON to be associated with one or more counties in its associated state; this can include all counties in the state.	ICIS-Air version 1.0
96.	N/A	May 10-15, 2012 SME Meetings	The system shall ensure that updating of LCON counties does not invalidate previously entered Facility/County data combinations.	ICIS-Air version 1.0
Logs				
View Submitted Process Logs				

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[24] The reference tables to be included will be identified during the physical database design.

ID	Client Req ID	Source Reference	Requirement	Planned Release
97.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to search for a Submitted Process Log by populating any one of the following fields or combination of fields: • Process Type • From Date • To Date • Status • New Process Logs Only.	ICIS-Air version 1.0
98.	N/A	April 25, 2012 SME Meeting	The system shall require the From and To dates on the Submitted Process Logs search criteria.	ICIS-Air version 1.0
99.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Submitted Process presented in a search results list.	ICIS-Air version 1.0
100.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the Submitted Process Logs Search results: • Process Type • ID • Submitted Date • Completed Date • Elapsed Time • Status • Error.	ICIS-Air version 1.0
101.	N/A	April 25, 2012 SME Meeting	The system shall include a Refresh option on the Submitted Process Logs search results.	ICIS-Air version 1.0
View Background Process Logs				
102.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to search for a Background Process Log by populating any one of the following fields or combination of fields: • Background Log • From Date • To Date • Success Flag	ICIS-Air version 1.0
103.	N/A	April 25, 2012 SME Meeting	The system shall require the From and To dates on the Background Process Logs search criteria.	ICIS-Air version 1.0
104.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the Background Process Logs presented in a search results list.	ICIS-Air version 1.0
105.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the Background Process Log Search results: • Name • Year • Quarter • Compliant Permits • RNC On/Off Month • Start • End • Success? • Errors? • Forceful Shutdown? • Gathered • Processed • Success • Fail.	ICIS-Air version 1.0
News & Alerts				
List News & Alerts				
106.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to list News and Alerts.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
107.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to sort the News and Alerts presented in a search results list.	ICIS-Air version 1.0
108.	N/A	April 25, 2012 SME Meeting	The system shall include the following information in the News and Alerts Search results: • Start Date • Title • Contents • Type • Program(s).	ICIS-Air version 1.0
109.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to select a News/Alert item from the search results to edit.	ICIS-Air version 1.0
110.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to select a News/Alert item from the search results to delete.	ICIS-Air version 1.0
111.	N/A	April 25, 2012 SME Meeting	The system shall provide an option for the user to add a new News & Alert item.	ICIS-Air version 1.0
Add News & Alerts				
112.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to add a News & Alerts item.	ICIS-Air version 1.0

113.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Add News & Alerts screen:
			• Title
			• Content
			• Start Date
			• Start Time
			• Start AM/PM
			• End Date
			• End Time
			• End AM/PM
			• Alert
			• Program
			  – System-Wide
			  – FE&C
			  – Air
			  – NPDES.
				ICIS-Air version 1.0

114.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when adding a News & Alerts item: • Title • Content • Start Date • Start Time • Start AM/PM.	ICIS-Air version 1.0
Edit News & Alerts				
115.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to edit an existing News & Alerts item.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release

116.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Edit News & Alerts screen:
			• Title
			• Content
			• Start Date
			• Start Time
			• Start AM/PM
			• End Date
			• End Time
			• End AM/PM
			• Alert
			• Program (multi-select)
			  – System-Wide
			  – FE&C
			  – Air
			  – NPDES
			• Created Date
			• Created By
			• Last Modified Date
			• Last Modified By.
				ICIS-Air version 1.0

117.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Edit News & Alerts screen: • Created Date • Created By • Last Modified Date • Last Modified By.	ICIS-Air version 1.0
118.	N/A	April 25, 2012 SME Meeting	The system shall require the user to enter data into the following fields when editing a News & Alerts item: • Title • Content • Start Date • Start Time • Start AM/PM. • Program(s)	ICIS-Air version 1.0
Subscribe News & Alerts				
119.	N/A	April 25, 2012 SME Meeting	The system shall allow the user to edit their News & Alerts subscriptions.	ICIS-Air Future Release

120.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements on the Subscribe News & Alerts screen:
			• User ID
			• Program (multi-select)
			  – System-Wide
			  – FE&C
			  – Air
			  – NPDES
			• Change Request Tracking
			  – System-Wide
			  – FE&C
			  – Air
			  – NPDES
			• Created By
			• Created Date
			• Last Modified By
			• Last Modified Date.
				ICIS-Air Future Release

ID	Client Req ID	Source Reference	Requirement	Planned Release
121.	N/A	April 25, 2012 SME Meeting	The system shall display the following data elements as read-only on the Subscribe News & Alerts screen: • User ID • Program – System-Wide • Created By • Created Date • Last Modified By • Last Modified Date.	ICIS-Air Future Release

3.9.3   System Administration Data Requirements

Table 3.9-2 lists the data element requirements that apply to System Administration. This table indicates the system and business rules for the data elements.

Table 3.9-2. ICIS-Air System Administration Data Requirements

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
User Administration							
1.	Y	Y	N	N	N/A	N/A	User ID • Alphanumeric (30)
2.	N	N	N	N	N/A	N/A	Region code • Must be validated against REF_REGION Table. • Alphanumeric (2)
3.	N	N	N	N	N/A	N/A	State code • Must be validated against REF_STATE Table. • Alphanumeric (2)
4.	N	Y	N	N	N/A	N/A	Data Access Level Code • Must be validated against Ref Table. • Alphanumeric (3)

5.	N	N	N	N	N/A	N/A	Sensitive Data Flag
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

6.	N	N	N	N	N/A	N/A	Air Program Flag
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

7.	N	N	N	N	N/A	N/A	NPDES Program Flag
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

8.	N	N	N	N	N/A	N/A	Primary Data Entry
							• Valid Values:
							  – Online
							  – Electronic Submission

9.	N	Y	N	N	N/A	N/A	First Name • Alphanumeric (30)
10.	N	N	N	N	N/A	N/A	Middle Name • Alphanumeric (10)

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
11.	N	Y	N	N	N/A	N/A	Last Name • Alphanumeric (30)
12.	N	Y	N	N	N/A	N/A	Organization ID • Foreign Key to Ref Table.
13.	N	Y	N	N	N/A	N/A	Office ID • Foreign Key to ICIS_OFFICE Ref Table.
14.	N	Y	N	N	N/A	N/A	Telephone Number • Alphanumeric (15)
15.	N	N	N	N	N/A	N/A	Telephone Extension • Alphanumeric (15)
16.	N	N	N	N	N/A	N/A	Fax Number • Alphanumeric (15)
17.	N	N	N	N	N/A	N/A	Cell Phone Number • Alphanumeric (15)
18.	N	Y	N	N	N/A	N/A	E-mail address • Alphanumeric (30)
19.	N	Y	N	N	N/A	N/A	User Roles • Must be validated against Ref Table • Number • 0 to Many Roles may be entered
20.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
21.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
22.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
23.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)
Role Administration							
24.	Y	Y	N	Y	N/A	N/A	Role ID • Number
25.	N	Y	N	N	N/A	N/A	Role Name • Alphanumeric (50)
26.	N	Y	N	N	N/A	N/A	Role Description • Alphanumeric (150)
27.	N	Y	N	Y	N/A	N/A	Assigner Type Code • Alphanumeric (3)
28.	N	Y	N	Y	N/A	N/A	Assignee Type Code • Alphanumeric (3)

29.	N	Y	N	N	N/A	N/A	System Role Flag
							• Alphanumeric (1)
							• Valid Values:
							  – N
							  – Y

30.	N	Y	N	N	N/A	N/A	Function Codes • Foreign Key to Ref Table • 1 to Many Functions may be entered
31.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
32.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
33.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
34.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)
Contacts Maintenance							
Contacts							
35.	Y	Y	N	Y	N/A	N/A	Person ID • Number
36.	N	Y	N	N	N/A	N/A	First Name • Alphanumeric (30)
37.	N	N	N	N	N/A	N/A	Middle Initial • Alphanumeric (10)
38.	N	Y	N	N	N/A	N/A	Last Name • Alphanumeric (30)
39.	N	N	N	N	N/A	N/A	Organization ID • Foreign Key to Ref Table.
40.	N	N	N	N	N/A	N/A	Office ID • Foreign Key to ICIS_OFFICE Table.
41.	N	N	N	N	N/A	N/A	Region Code • Must be validated against REF_REGION Table. • Alphanumeric (2)
42.	N	N	N	N	N/A	N/A	State Code • Must be validated against REF_STATE Table. • Alphanumeric (2)
43.	N	N	N	N	N/A	N/A	LCON ID • Must be validated against Ref Table. • Number
44.	N	Y	N	N	N/A	N/A	Telephone Extension • Alphanumeric (15)
45.	N	N	N	N	N/A	N/A	Fax Number • Alphanumeric (15)
46.	N	N	N	N	N/A	N/A	Cell Phone Number • Alphanumeric (15)
47.	N	Y	N	N	N/A	N/A	E-mail address • Alphanumeric (30)

48.	N	N	N	N	N/A	N/A	FE&C
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

49.	N	N	N	N	N/A	N/A	Air
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

50.	N	N	N	N	N/A	N/A	NPDES
							• Alphanumeric (1)
							• Valid Values:
							  – N (Default)
							  – Y

51.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
52.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
53.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
54.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)
Office							
55.	Y	Y	N	Y	N/A	N/A	Office ID • Number
56.	N	Y	N	N	N/A	N/A	Office Type • Must be validated against REF_OFFICE_TYPE Table • Alphanumeric (3)
57.	N	Y	N	N	N/A	N/A	Office Name • Alphanumeric (100)
58.	N	N	N	N	N/A	N/A	Agency Code • Must be validated against REF_AGENCY Table • Number
59.	N	N	N	N	N/A	N/A	Address 1 • Alphanumeric (50)
60.	N	N	N	N	N/A	N/A	Address 2 • Alphanumeric (50)
61.	N	N	N	N	N/A	N/A	City • Alphanumeric (30)
62.	N	N	N	N	N/A	N/A	State Code • Must be validated against REF_STATE table • Alphanumeric (2)
63.	N	N	N	N	N/A	N/A	Province • Alphanumeric (35)
64.	N	N	N	N	N/A	N/A	Zip Code • Alphanumeric (14)
65.	N	N	N	N	N/A	N/A	County • Alphanumeric (35)
66.	N	N	N	N	N/A	N/A	Country • Must be validated against REF_COUNTRY table • Alphanumeric (3)
67.	N	N	N	N	N/A	N/A	Building • Alphanumeric (25)
68.	N	N	N	N	N/A	N/A	Region • Must be validated against REF_REGION table • Alphanumeric (2)
69.	N	N	N	N	N/A	N/A	LCON • Must be validated against Ref. table • Alphanumeric (30)
70.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
71.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
72.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
73.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
Organizations							
74.	Y	Y	N	Y	N/A	N/A	Organization ID • Number
75.	N	Y	N	N	N/A	N/A	Organization Name • Alphanumeric (30)
76.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
77.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
78.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
79.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)
Reference Table Maintenance							
LCONs							
80.	Y	Y	N	Y	N/A	N/A	LCON ID • Alphanumeric (30)
81.	N	Y	N	N	N/A		Description • Alphanumeric (100)
82.	N	Y	N	N	N/A	N/A	State Code • Must be validated against REF_STATE • Alphanumeric (2)
83.	N	N	N	N	N/A	N/A	County Code • Must be validated against REF_COUNTY • Alphanumeric (5) • 0 to Many Codes may be entered
84.	N	N	N	N	N/A		Legacy AFS Code • Number (5)
85.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
86.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
87.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
88.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)
News & Alerts							
News & Alerts							
89.	Y	Y	N	Y	N/A	N/A	News ID • Number
90.	N	Y	N	N	N/A	N/A	Title • Alphanumeric (50)
91.	N	Y	N	N	N/A	N/A	Content • Alphanumeric (4000)
92.	N	Y	N	N	N/A	N/A	Start Date/Time • DateTime (MM/DD/YYYY HH:MM:SS)
93.	N	N	N	N	N/A	N/A	End Date/Time • DateTime (MM/DD/YYYY HH:MM:SS)

94.	N	N	N	N	N/A	N/A	Alert
							• Valid Values:
							  – N (Default)
							  – Y

ID	Key?	SR	PR	SG	Client Req ID	AFS Acronym	Requirement
95.	N	N	N	N	N/A	N/A	Program • Alphanumeric (30) • 1 to Many Codes allowed
96.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
97.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
98.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
99.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)
Subscription							
100.	N	Y	N	Y	N/A	N/A	User ID • Alphanumeric (30)
101.	N	N	N	N	N/A	N/A	Program • Alphanumeric (30) • 1 to Many codes allowed
102.	N	N	N	N	N/A	N/A	Change Request tracking • Alphanumeric (30) • 0 to Many Codes Allowed
103.	N	Y	N	Y	N/A	N/A	Created By • Alphanumeric (30)
104.	N	Y	N	Y	N/A	N/A	Created Date • Date (MM/DD/YYYY)
105.	N	Y	N	Y	N/A	N/A	Last Modified By • Alphanumeric (30)
106.	N	Y	N	Y	N/A	N/A	Last Modified Date • Date (MM/DD/YYYY)

SR = System Required (Yes/No); PR = Programmatically Required (Yes/No); SG = System Generated (Yes/No).

3.9.4 System Administration Business Rule Requirements

Table 3.9-3 lists the business rules requirements that apply to System Administration. This table includes the business rules for data elements and error handling.

Table 3.9-3. ICIS-Air System Administration Business Rule Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The system shall not allow a new user to be created if the E-mail Address already exists for another user.	ICIS-Air version 1.0
2.	N/A	The system shall not allow a new user to be created if the User ID already exists for another user.	ICIS-Air version 1.0
3.	N/A	The system shall not allow a user to unsubscribe from System-wide News & Alerts.	ICIS-Air Future Release
4.	N/A	The system shall assign assigner_type and assignee_type of a custom role based on the assigner_type and assignee_type of the selected functions.	ICIS-Air version 1.0
5.	N/A	The system shall not allow the user to create a custom role that would violate assigner_type and assignee_type assignments of the selected roles.	ICIS-Air version 1.0
6.	N/A	The system shall not allow an Air-only user to edit Contacts that do not have an Air Program Association, except to add an Air Association.	ICIS-Air version 1.0
7.	N/A	The system shall not allow a non-Air user to edit Contacts that only have an Air Program Association, except to add an FE&C or NPDES Association.	ICIS-Air version 1.0

3.9.5 User Administration—Web Only

3.9.5.1 *Add User*

A current User record is uniquely identified by the following key data elements:

- E-mail Address

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.

Users must have the Add User privileges to add a User. Users may add a User by performing the following steps:

- Click on the Search Users link. ICIS-Air will display the User Search Criteria screen.
- Search to verify the User does not already exist and select Add User. ICIS-Air will display the Add User screen.
  OR
- Click on the Add User link from the Home Screen. ICIS-Air will display the Add User screen.
  THEN
- After entering basic User information, the User must assign roles to the new User.

Figure 3.9-1 shows the Add User screen, and Figure 3.9-2 shows the Assign Roles screen.

Figure 3.9-1. Notional Screen: Add User

Figure 3.9-2. Current ICIS Screen: Assign User Roles

3.9.5.2   Edit User

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit a User by accessing the Edit User screen from the Search User results screen.

Users must have the Edit User privileges to edit an existing User record. Users may edit a User by performing the following steps:

- Click on the Search Users link. ICIS-Air will display the User Search Criteria screen.
- Search and select User. ICIS-Air will display the Edit User screen.

Figure 3.9-3 shows the Search User notional screen. Figure 3.9-4shows the Edit User notional screen.

Figure 3.9-3. Notional Screen: Search User

Figure 3.9-4. Notional Screen: Edit User

3.9.5.3   Reset Password for Others

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may Reset another User's Password by accessing the Reset Password for Others screen from the Home screen.

Users must have the Reset Password for Others privileges to Reset Password for another User. Users may Reset Password for Others by performing the following steps:

• Click on the Reset Password for Others link.

Figure 3.9-5 shows the Reset Password for Others screen.

Figure 3.9-5. Current ICIS Screen: Reset Password for Others

3.9.5.4   My Profile

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit their own User Profile by accessing the My Profile screen from the Home screen.

Users may edit their User Profile by performing the following steps:

- Click on the My Profile link. ICIS-Air will display the My Profile screen.

Figure 3.9-6 shows the My Profile notional screen.

Figure 3.9-6. Notional Screen: My Profile

3.9.5.5   Change My Password

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit their own password by accessing the Change My Password screen from the Home screen.

Users may change their password by performing the following steps:

- Click on the Change My Password link. ICIS-Air will display the Change My Password screen.

Figure 3.9-7 shows the Change My Password notional screen.

Figure 3.9-7. Current ICIS Screen: Change My Password

3.9.6 Role Administration—Web Only

3.9.6.1 Add Role

A current Role record is uniquely identified by the following key data elements:

- Role ID

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.
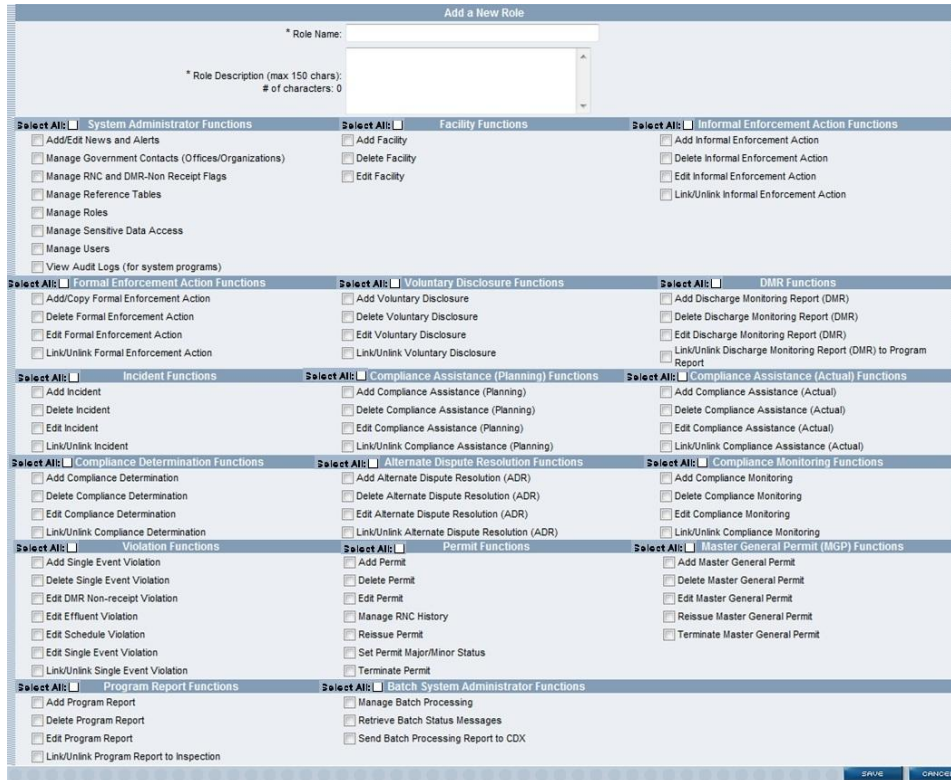
Users must have the Add Role privileges to add a Role. Users may add a Role by performing the following steps:

- Click on the List Roles link. ICIS-Air will display the List Roles screen.
- Search and select Add Role link. ICIS-Air will display the Add Role screen.
  OR
- Click on the Add Role link from the Home Screen. ICIS-Air will display the Add Role screen.

Figure 3.9-8 shows the Add Role screen.

Figure 3.9-8. Current ICIS Screen: Add Role with Notional Select All Option

3.9.6.2   Edit Role

Web
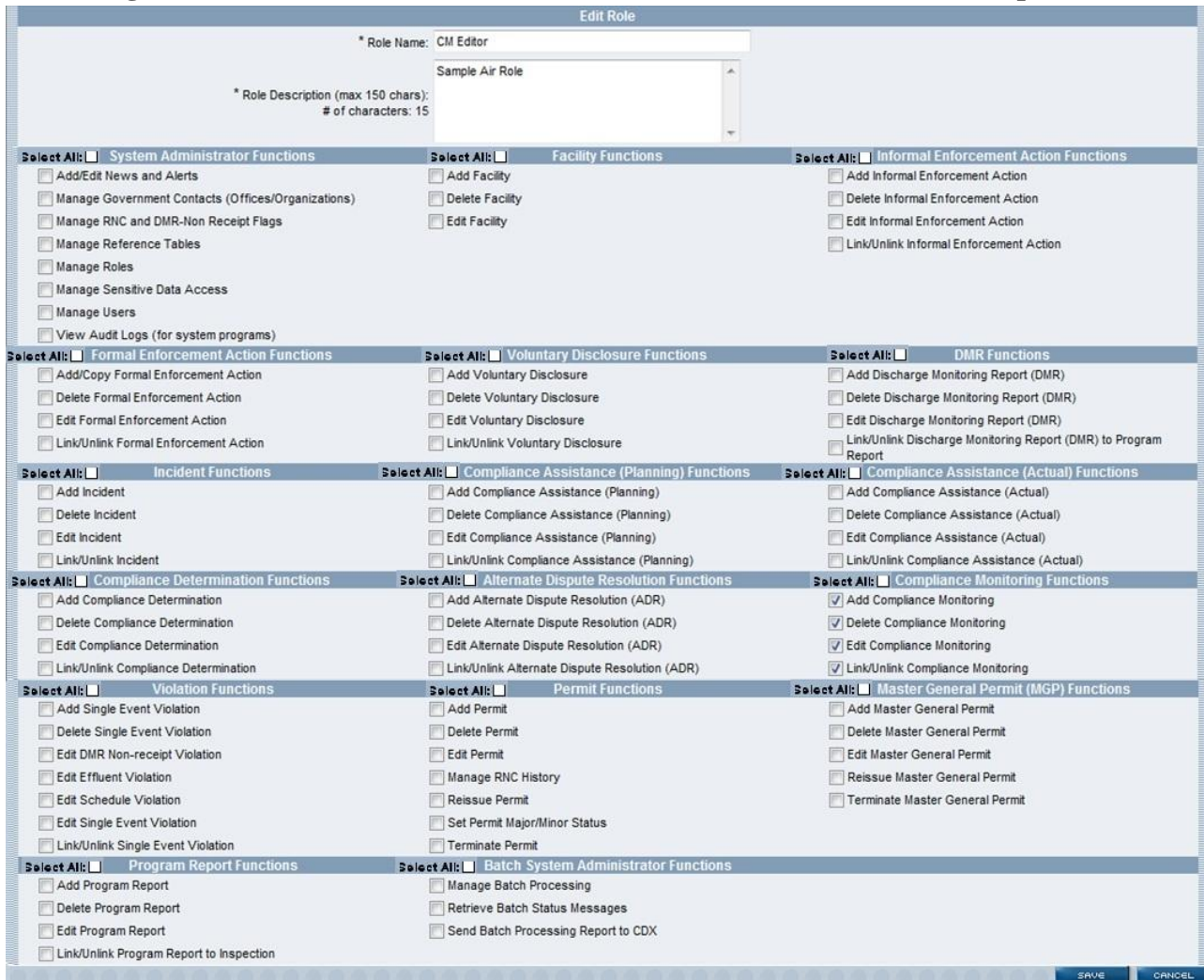
Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit a Role by accessing the Edit Role screen from the List Roles screen.

Users must have the Edit Role privileges to edit an existing Custom Role record. Users may edit a Role by performing the following steps:

- Click on the List Roles link. ICIS-Air will display the List Roles screen.
- Click the Edit link to the right of the desired role. ICIS-Air will display the Edit Role screen.

Figure 3.9-9 shows the Edit Role screen.

Figure 3.9-9. Current ICIS Screen: Edit Role with Notional Select All Option

3.9.7 Contacts Maintenance—Web Only

3.9.7.1 Contacts

3.9.7.1.1 Add Contact

A current Contact record is uniquely identified by the following key data elements:

- E-mail Address

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.

Users must have the Add Contact privileges to add a Contact. Users may add a Contact by performing the following steps:

- Click on the Search Contacts link. ICIS-Air will display the Contacts Search Criteria screen.

- Search and select Add Contact. ICIS-Air will display the Contact screen.

Figure 3.9-10 shows the Add Contact screen.

Figure 3.9-10. Notional Screen: Add Contact

3.9.7.1.2 Edit Contact

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit a Contact by accessing the Edit Contact screen from the Contacts Search Results screen.

Users must have the Edit Contact privileges to edit an existing Contact record. Users may edit a Contact by performing the following steps:

- Click on the Search Contacts link. ICIS-Air will display the Contacts Search Criteria screen.
- Search and select Contact. ICIS-Air will display the Edit Contact screen.

Figure 3.9-11 shows the Edit Government Contact notional screen; Figure 3.9-12 shows the Edit Non-Government Contact notional screen.

Figure 3.9-11. Notional Screen: Edit Contact - Government

Figure 3.9-12. Notional Screen: Edit Contact – Non-Government

Figure 3.9-13 shows the Search Contacts notional screen; Figure 3.9-14 shows the Search Contacts Results notional screen.

Figure 3.9-13. Notional Screen: Search Contacts

Figure 3.9-14. Notional Screen: Search Contacts Results

3.9.7.2   Offices

3.9.7.2.1 Add Office

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.

Users must have the Add Office privileges to add an Office. Users may add an Office by performing the following steps:

- Click on the Search Office link. ICIS-Air will display the Office Search Criteria screen.
- Search and select the Add Office link. ICIS-Air will display the Add Office screen.
  OR
- Click the Add Office link. ICIS-Air will display the Add Office screen.

Figure 3.9-15 shows the Add Office screen.

Figure 3.9-15. Notional Screen: Add Office

3.9.7.2.2 Edit Office

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit an Office by accessing the Edit Office screen from the Office Search Results screen.

Users must have the Edit Office privileges to edit an existing Office record. Users may edit an Office by performing the following steps:

- Click on the Search Office link. ICIS-Air will display the Office Search Criteria screen.
- Search and select Office. ICIS-Air will display the Edit Office screen.

Figure 3.9-16 shows the Edit Office notional screen.

Figure 3.9-16. Notional Screen: Edit Office

Figure 3.9-17 shows the Search Offices notional screen; Figure 3.9-18 shows the Search Offices Results notional screen.

Figure 3.9-17. Notional Screen: Search Offices

Figure 3.9-18. Notional Screen: Search Offices Results

3.9.7.3 Organizations

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.

Users must have the Add Organization privileges to add an Organization. Users may add an Organization by performing the following steps:

- Click on the Search Organization link. ICIS-Air will display the Organization Search Criteria screen.
- Search and select Add Organization. ICIS-Air will display the Add Organization screen. OR
- Click the Add Organization link. ICIS-Air will display the Add Organization screen.

Figure 3.9-19 shows the Add Organization screen.

Figure 3.9-19. Notional Screen: Add Organization

3.9.7.3.1 Edit Organization

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit an Organization by accessing the Edit Organization screen from the Organization Search Results screen.

Users must have the Edit Organizations privileges to edit an existing Organization record. Users may edit an Organization by performing the following steps:

- Click on the Search Organizations link. ICIS-Air will display the Organizations Search Criteria screen.
- Search and select Organization. ICIS-Air will display the Edit Organization screen.

Figure 3.9-20 shows the Edit Organization notional screen.

Figure 3.9-20. Notional Screen: Edit Organization

Figure 3.9-21 shows the Search Organizations Results notional screen.

Figure 3.9-21. Notional Screen: Search Organizations Results
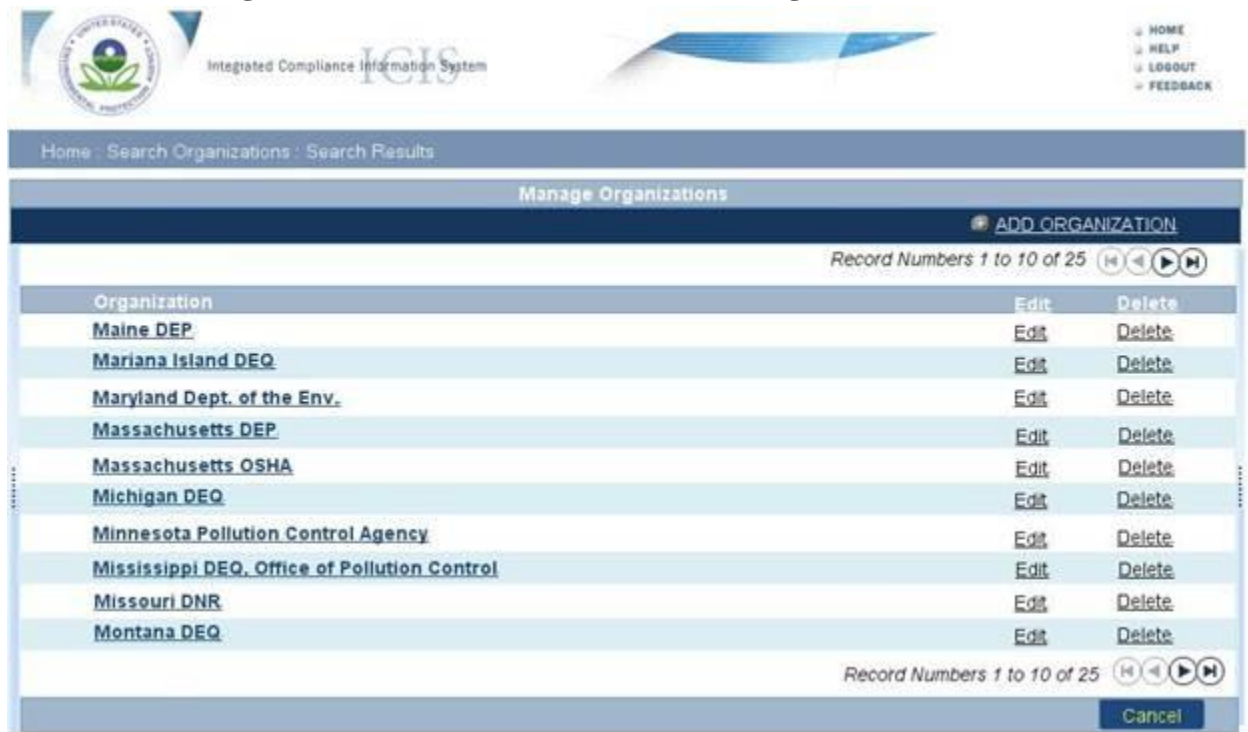
3.9.8   Reference Table Maintenance—Web Only

3.9.8.1   Edit a Reference Table

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit a Reference Table by accessing the desired Reference Table from the Home screen.

Users must have the Edit Reference Tables privileges to edit a Reference Table. Users may edit a Reference Table by performing the following steps:

- Click on the appropriate Reference Table link. ICIS-Air will display the applicable Search Reference Table Criteria screen.
- Search and select the Reference Value to edit or the Add option on the Search Results list. ICIS-Air will display the appropriate screen.

Figure 3.9-22 shows an example Add Reference Table Value screen from ICIS.

Figure 3.9-22. Example Add Reference Table Value Screen

3.9.9   Logs—Web Only

3.9.9.1   View Submitted Process Logs

Web

Users must have the View Submitted Process Logs privileges to View Submitted Process Logs. Users may View Submitted Process Logs by performing the following steps:

* Click on the View Submitted Process Logs link.

Figure 3.9-23 shows the View Submitted Process Logs screen.

Figure 3.9-23. Current ICIS Screen: View Submitted Process Logs

3.9.9.2   View Background Process Logs

Web
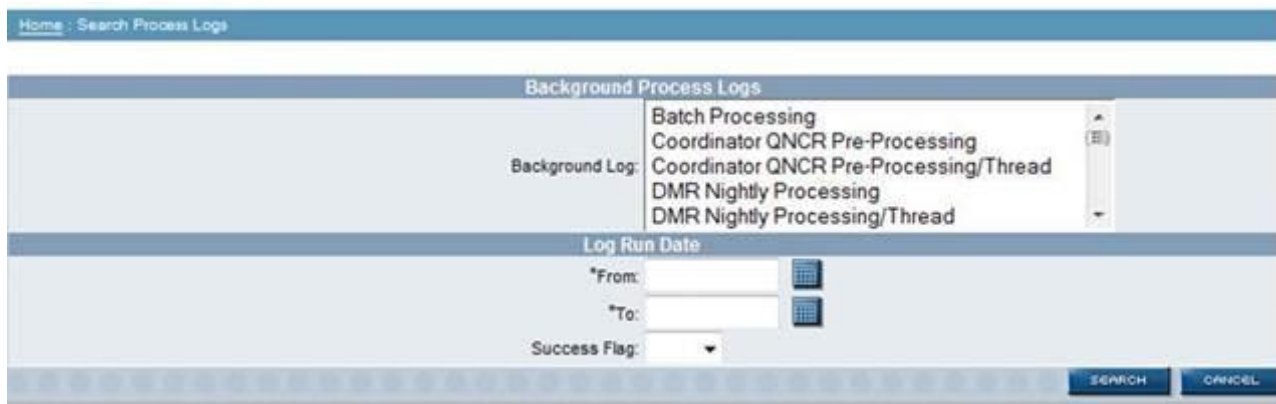
Users must have the View Background Process Logs privileges to View Background Process Logs. Users may View Background Process Logs by performing the following steps:

* Click on the View Background Process Logs link.

Figure 3.9-24 shows the View Background Process Logs screen.

Figure 3.9-24. Current ICIS Screen: View Background Process Logs

3.9.10 News & Alerts—Web Only

3.9.10.1   Add News & Alerts

The following data elements contain default values:

- Start Date
- Start Time
- Start AM/PM

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See FCEs, PCEs, Investigations, and Information Requests Data Requirements and FCEs, PCEs, Investigations, and Information Requests Business Rule Requirements for more details.

Users must have the Add News & Alerts privileges to add a News & Alert item. Users may add a News & Alerts item by performing the following steps:

- Click on the List News & Alerts link. ICIS-Air will display the List News & Alerts screen.
- Search and select Add News & Alerts link. ICIS-Air will display the Add News & Alerts screen.

  OR
- Click Add News & Alerts link. ICIS-Air will display the Add News & Alerts screen.

Figure 3.9-25 shows the Add News & Alerts screen.

Figure 3.9-25. Notional Screen: Add News & Alerts

3.9.10.2   Edit News & Alerts

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may edit a News & Alerts item by accessing the Edit News & Alerts screen from the List News & Alerts screen.

Users must have the Edit News & Alerts privileges to edit an existing News & Alerts record; users without the Edit News & Alerts privilege can List News & Alerts and get additional details about a particular item, but may not edit it. Users may edit a News & Alerts item by performing the following steps:

- Click on the List News & Alerts link. ICIS-Air will display the List News & Alerts screen.
- Search and select News & Alerts item. ICIS-Air will display the Edit News & Alerts screen.

Figure 3.9-26 shows the List News & Alerts notional screen for System Administrators; Figure 3.9-27 shows the List News & Alerts notional screen for General Users.

Figure 3.9-26. Notional Screen: List News & Alerts – System Administrator

Figure 3.9-27. Notional Screen: List News & Alerts – General User

3.9.10.3 Subscribe News & Alerts

Web

Web users will receive an error message when key data elements are missing or invalid, non-key data elements have invalid data, and edit checks and/or business rules are violated. See Section 3.9.3, System Administration Data Elements, and Section 3.9.4, System Administration Business Rules, for more details.

Users may subscribe to News & Alerts items by accessing the Subscribe News & Alerts screen from the Home screen.

• Click on the Subscribe News & Alerts link. ICIS-Air will display the Subscribe News & Alerts screen.

Figure 3.9-28 shows the Subscribe News & Alerts notional screen.

Figure 3.9-28. Notional Screen: Subscribe News & Alerts

3.10   USER SUPPORT

In legacy AFS, users received support, expressed concerns, and submitted change requests by directly contacting EPA Headquarters. The modernized system will expand upon the existing ICIS user support functionality, providing the ability to integrate with tools that provide robust functionality for users. In the modernized system, users will be given access to expanded user support functionality including enhancements in User Change Request submissions. Additionally, the existing News and Alerts functionality will be enhanced to include updates on user submitted change requests, as well as automated information updates (e.g., Policy Information).

3.10.1 Summary User Support Modernization in ICIS-Air

Some User Support functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Integrated User Change Requests**
  In the legacy system, users would report a change request to Headquarters who, after verifying the validity of the change request, will pass along the request to the contractor for internal change request management. In the modernized system, users will be able to directly enter a Change Request while in ICIS. This request would be routed directly to EPA who could then either disposition and respond to it or route it to the contractor; ideally EPA and the contractor will use an integrated system of change tracking as well. The following functionalities could be available to users when submitting a change request from within the system:
  – Context-sensitive user request generation would allow for certain ticket information (e.g., user, date, and system location) to be pre-populated by the system
  – Ability to incorporate a screenshot in the request
  – Ability to track the status of the request
  – Ability to view all submitted Change requests and the status of requests users select; users will not be able to see screenshots of change requests they did not submit as they could contain enforcement sensitive information
  – Users will have the ability to classify priority for change requests and defects that will be expedited for correction

Note: a Change Request is defined for functionality that does not currently exist in the system design. A Defect Correction is notification that current system functionality is not working properly according to design.

- **Subscriptions and Online Change Requests**

  The current News & Alert page in ICIS is updated only by System Administrators. In the modernized system, the News and Alerts functionality will be synced with the Change Request tracking system to system generate News and Alerts for Change Requests. Users will have the ability to receive notification when submitted and/or subscribed Change Requests are updated. Additionally, users will be able to tailor their individual News and Alerts via subscription options and selected data ranges.[25]

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the User Support module in ICIS-Air.

3.10.2 User Support Functional Requirements

Table 3.10-1 lists the requirements that apply to User Support. It includes functions that are allowed and business rules within a function.

Table 3.10-1. ICIS-Air User Support Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.24.8	EPA SRS, SME 2/27/2012	The system shall allow users to submit a Change Request.	ICIS-Air version 1.0
2.	N/A	SME 2/27/2012	The system shall use pre-populate the following Change Request ticket information: User • Submittal Date • System Location	ICIS-Air version 1.0
3.	N/A	SME 2/27/2012	The system shall display the following data elements on the Change Request screen for the user: • User • Submittal Date • System Location • Change Request Title • Change Request Text	ICIS-Air version 1.0
4.	N/A	SME 2/27/2012	The system shall allow users to attach screenshots to their Change Requests.	ICIS-Air version 1.0
5.	5.24.11	EPA SRS	The system shall allow users to search and track the status of their change requests.	ICIS-Air version 1.0
6.	5.24.11	EPA SRS	The system shall allow users to search and track the status of all change requests.	ICIS-Air version 1.0
7.	N/A	SME 2/27/2012	The system shall allow users to subscribe to Changes Requests that other users have submitted.	ICIS O&M
8.	N/A	SME 2/27/2012	The system shall allow users to automatically subscribe to Change Requests they have submitted.	ICIS O&M

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[25] Several User Support tools that include Dashboards are currently being investigated for implementation into ICIS; (e.g.., Managengine, BMC Remedy); ICIS-AFS will need to interact with and leverage the selected tool.

ID	Client Req ID	Source Reference	Requirement	Planned Release
9.	N/A	SME 2/27/2012	The system shall allow users to unsubscribe from any Change Request.	ICIS O&M
10.	N/A	SME 2/27/2012	The system shall restrict a user's ability to view associated screenshots on change requests to only those that the user has submitted.[26]	ICIS-Air version 1.0
11.	5.24.9, 5.24.10, 5.33.1	EPA SRS	The system shall allow the users to receive notification of submitted and/or subscribed Change Requests through News and Alerts functionality.	ICIS O&M
12.	5.24.9, 5.33.1	EPA SRS	The system shall allow users to tailor News & Alerts by selecting subscription options for RSS Feed.	ICIS-Air Future Release
13.	5.24.9	EPA SRS	The system shall allow users to tailor News & Alerts by selecting specific date ranges.	ICIS-Air Future Release
14.	5.24.9	EPA SRS, SME 2/27/2012	The system shall enforce the security model for the users to view, add, edit, and delete a Change Request. Refer to ICIS-Air Security Requirements.	ICIS-Air version 1.0

3.10.3 User Support Data Requirements

Table 3.10-2 lists the data element requirements that apply to User Support. This table includes the system, minimum data requirements, and possible future data elements.

Table 3.10-2. ICIS-Air User Support Data Requirements

ID	Key?	SR	PR	SG	Requirement
1.	Y	Y	N	Y	Change Request Identifier • Number
2.	N	N	N	N	Change Request Title • Alphanumeric (50) • Free-form text
3.	N	N	N	N	Change Request Description • Alphanumeric (500) • Free-form text
4.	N	N	N	C	Change Request User ID • Must be valid value
5.	N	N	N	Y	Date • Must be valid date in mm/dd/yyyy format
6.	N	N	N	N	Status • Must be validated against Ref Table.
7.	N	N	N	C	Change Request Module • Must be validated against Ref Table.
8.	N	N	N	C	Change Request Data Element • Must be validated against Ref Table.
9.	N	N	N	C	Change Request Priority • Must be validated against Ref Table.
10.	N	N	N	C	Change Request Severity • Must be validated against Ref Table.

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[26] Currently, there is an open issue about how Change Requests that may contain text with sensitive data are handled. A user is not required to submit a screenshot with a Change Request. Possible solutions include, issue a warning message to not include sensitive data. Another alternative would be a flag indicating that a Change Request contains sensitive data and may only be subscribed to by users with privileges.

3.10.4 User Support Business Rule Requirements

Table 3.10-3 lists the business rules requirements that apply to User Support. This table includes the business rules for data elements and error handling.

Table 3.10-3. ICIS-Air User Support Business Requirements

ID	Client Req ID	Requirement	Planned Release
1.	N/A	The system shall allow only submitter and Headquarters Systems Administrators with Sensitive privilege to view the corresponding Change Request screen shots.	ICIS-Air version 1.0

3.10.5 User Change Requests

All users may enter a Change Request.

A Change Request is uniquely identified by the following key data elements:

- Change Request Identifier

The following data elements are required to add a new Change Request in ICIS-Air:

- N/A.

See the data elements in Section 3.10.3 User Support Data Requirements and business rules in Section 3.10.4 User Support Business Rule Requirements for more details on rejecting User Support transactions.

Figure 3.10-1 illustrates an example screen for submitting a Change Request in ICIS-Air.

Figure 3.10-1. Notional Screen: Submitting a User Change Request
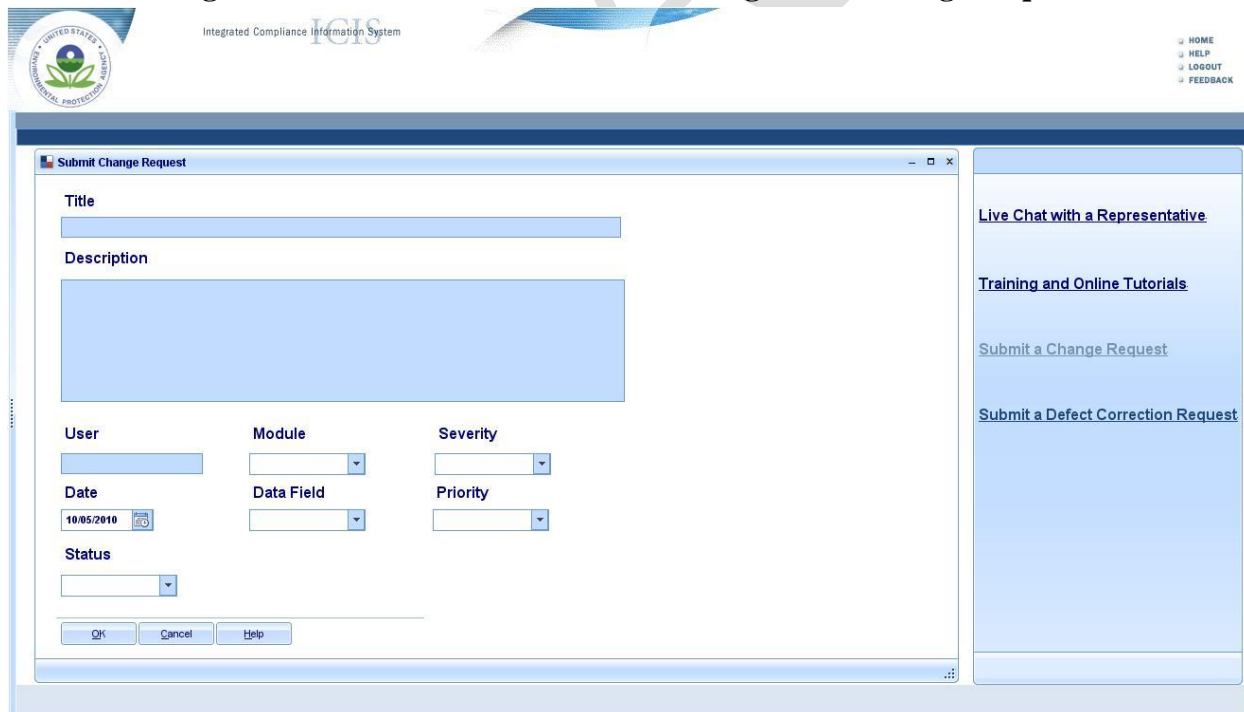
3.11 REPORTS INTRODUCTION

The Reporting function in ICIS-Air allows users to retrieve and display data in either standard reports or through ad hoc reporting and querying. ICIS-Air users will have the ability to report on Air data alone and also in combination with FE&C and/or NPDES data. Standard reports are pre-defined and may contain prompt information to retrieve commonly accessed information. National Standard Reports for Air were run from the AFS Legacy system.

Ad hoc reporting allows users to define their own report parameters, displaying information that caters to their specific needs or requirements. Ad hoc reporting uses a set of predefined objects to develop reports. Users can create customized queries and format the retrieved information to facilitate data analysis.

The reporting tool that will be employed in the modernized system has yet to be determined. Detailed information on these reporting methods is found in the sections below. ICIS-Air will employ a modern reporting suite that offers a variety of capabilities that will facilitate ease of reporting. The following is a list of reporting tools that will be available in the modernized system:

- User-friendly interface
- Ability to schedule, share, and send reports
- Ability to share report queries
- Drill-down reporting
- Complex "where" clause logic
- Ability to export report results to formats such as PDF, Excel, Comma-Separated Value (CSV), XML
- Ability to create temporary variables and reporting objects
- Ability to view object definitions
- Ability to view valid values in query objects.

3.11.1 Summary of Reports Modernization in ICIS-Air

Some Reports functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Boolean and "Where" Clause Logic**
  Legacy AFS Ad hoc reporting capability did not allow users the ability to use "or" in defining reports, forcing users to run multiple reports to obtain desired data sets. Boolean logic will be available in ICIS-Air and used to allow conditions to be set and linked by "AND" and "OR" operators. Filters on geographic locations, dates, actions, and other data fields will be used to limit and focus data to provide more accurate reporting. The modernized system will also support complex "Where" clause logic to assist users in defining complex selection criteria for ad hoc report generation.

- **Save and Share Ad hoc Queries**
  In Legacy AFS, Ad hoc and Standard report criteria were shared directly between users; however, there was no common library available for widespread sharing. In the modernized system, queries used for Ad hoc reporting will be able to be saved in an online library and the ability to share the queries with other ICIS-Air users will be

available. In ICIS-Air, reports will be able to be scheduled to run with the results automatically distributed to one or more interested parties.

- **Export**

  The ICIS-Air reporting tool will allow users to export report results to common data exchange formats such as Excel, CSV, PDF and XML.

- **Report Format**

  Legacy AFS Report Formats were limited to mainframe formatting functionality, requiring users to know AFS codes. Standard and custom Ad hoc reports formatting in ICIS-Air will include the placement of data in an organized manner on the report as well as allowing for business terminology in place of reference codes and other data fields.

- **Performance**

  The legacy system automatically shifted reports that took longer than six Central Processing Units (CPU) to run later in the evening or terminated them, depending on priority. ICIS-Air will remove the necessity to move CPU-intensive reports to off peak hours. Report performance will function based upon established Service Level Agreements and online user performance will not be impacted by report execution. Users will always have the option of choosing to schedule a long-running report to run during off-peak hours.

- **Reporting Data Warehouse**

  Ad hoc and Standard Reports will be executed against an ICIS-Air reporting data warehouse. An Extract, Transform, and Load (ETL) process will be used to convert data from the transactional database to a reporting database. The data warehouse will be designed based upon expected Standard Reports and Ad hoc report activity. The design will de-normalize data to optimize retrieval performance and calculate appropriate summary statistics that can support periodic, managerial reporting.

- **Reporting Tool**

  It has not yet been determined which Reporting tool will be used in ICIS-Air. The reporting tool that is ultimately selected will need to adhere to the requirements, for both Standard and Ad hoc reports, outlined in the following sections. The current ICIS reporting tool is Business Objects, Webintelligence and Crystal Reports.

Functional Requirements Table 3.11-1 lists the requirements, both general and standard/ad hoc specific, that apply to Reports.

Table 3.11-1. ICIS-Air Reports Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
General Reports Requirements				
1.	N/A		The system shall allow users to report on Air-only data.	ICIS-Air version 1.0
2.	N/A		The system shall allow users to report combinations of integrated data: • Air & FE&C • Air & NPDES.	ICIS-Air version 1.0
3.	N/A		The system shall allow users to report on any data element in the system that appears on the Graphical User Interface (GUI) screens.	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
4.	N/A		The system shall report near real-time data, employing an ETL and data warehouse that protects the operational database.	ICIS-Air version 1.0
5.	5.17.1	EPA SRS	The system shall allow users to schedule the time any reports job shall be run.	ICIS-Air version 1.0
6.	N/A		The system shall allow users to schedule automated reports.	ICIS-Air version 1.0
7.	5.17.2	EPA SRS	The system shall allow users to run reports on demand.	ICIS-Air version 1.0
8.	5.4.3, 5.17.3	EPA SRS	The system shall allow users to view column definitions in the DED.	ICIS-Air version 1.0
9.	5.17.4	EPA SRS	The system shall allow users to view valid Reference Table values for objects within a Universe.	ICIS-Air version 1.0
10.	5.17.8	EPA SRS	The system shall allow users to save, edit, retrieve and share queries for standard and ad hoc reporting.	ICIS-Air version 1.0
11.	N/A		The system shall allow users to save report criteria for reuse.	ICIS-Air version 1.0
12.	5.17.9, 5.17.14	EPA SRS	The system shall allow users to save, share, and send reports for standard and ad hoc reporting.	ICIS-Air version 1.0
13.	N/A		The system shall allow users to share and send reports outside of the system to non-users.	ICIS-Air version 1.0
14.	5.17.10, 5.17.14, 5.19.2, 5.19.3	EPA SRS	The system shall allow users to save and send data retrievals in the following document formats: XML.	ICIS-Air version 1.0
15.	5.17.10, 5.17.13, 5.17.14	EPA SRS	The system shall allow users to save and send data retrievals in the following document format: Excel.	ICIS-Air version 1.0
16.	5.17.10, 5.17.13, 5.17.14	EPA SRS	The system shall allow users to save and send data retrievals in the following document format: CSV.	ICIS-Air version 1.0
17.	5.17.10, 5.17.14	EPA SRS	The system shall allow users to save and send data retrievals in the following document format: PDF.	ICIS-Air version 1.0
18.	5.17.10, 5.17.14	EPA SRS	The system shall allow users to save and send data retrievals in the following document format: HTML.	ICIS-Air version 1.0
19.	5.17.11, 5.17.13, 5.17.14	EPA SRS	The system shall allow users to export data into commercial software (e.g., Excel, Access) by providing .CSV export capabilities.	ICIS-Air version 1.0
20.	5.18.1	EPA SRS	The system shall provide filters/prompts that allow users to easily narrow queries by geography/data owner/program.	ICIS-Air version 1.0
21.	5.17.3	EPA SRS	The system shall allow the use of dedicated tables for use in report generation.	ICIS-Air version 1.0
22.	5.27.2	EPA SRS	The system shall adhere to the latest ICIS reports performance standards.	ICIS-Air version 1.0
23.	5.27.2	EPA SRS	The system shall provide the user a message if the report will take longer than 60 minutes to run indicating that the request should be queued for a night time run.	ICIS-Air version 1.0
Ad Hoc Reporting Requirements				

ID	Client Req ID	Source Reference	Requirement	Planned Release
24.	N/A		The system shall allow users to create runtime and temporary variables for Ad Hoc reporting.	ICIS-Air version 1.0
25.	5.17.12	EPA SRS	The system shall allow users to use complex "where" clause logic when constructing ad-hoc queries.	ICIS-Air version 1.0
26.	5.17.12	EPA SRS	The system shall use employ Boolean logic, allowing users to use both the "and" and "or" operators when writing ad-hoc queries.	ICIS-Air version 1.0
27.	5.17.6	EPA SRS	The system shall provide users drill-down reporting capabilities, giving users immediate access to detailed underlying data.	ICIS-Air version 1.0
28.	N/A		The system shall allow users to copy standard reports to be used as a template for ad hoc reporting.	ICIS-Air version 1.0
Standard Reporting General Requirements				

29.	5.18.1	EPA SRS	The system shall allow users to filter geographic report criteria according to the following selections:
			• Facility City
			• Facility State
			• Facility Region
			• Facility LCON
			• Tribal Land
			• Nonattainment Area
			• Other Criteria (e.g., Chesapeake Bay Ozone Transport, Nonattainment Area)
			• Facility Name
			• Facility Identifier
			• Facility Pollutants
			• Facility Programs
			• Facility Subparts
			• Facility Classification:
			  – Default
			  – State
			  – EPA
			• Facility Operating Status
			• Facility Universe
				ICIS-Air version 1.0

30.	5.18.1	EPA SRS	The system shall allow users to filter activity report criteria according to the following selections: • Activity performed by State • Activity performed by Region • Activity performed by LCON • Activity pollutants • Activity programs • Activity sub parts	ICIS-Air version 1.0
31.	5.17.7, 5.27.3	EPA SRS	All Standard Reports shall contain the following header information: • Input Criteria • Created Date • Refresh Date • Created By • Report Title • EPA logo • Sensitive Data Indicator	ICIS-Air version 1.0

ID	Client Req ID	Source Reference	Requirement	Planned Release
32.	N/A		All Standard Reports shall contain the following footer information: Page X of XX	ICIS-Air version 1.0
Standard Reports				
33.	5.1.7, 5.18.2	EPA SRS	The system shall support the Critical Data Element report.	ICIS-Air version 1.0
34.	5.18.3	EPA SRS	The system shall support the List of Active/New Alleged Violation Files report.	ICIS-Air version 1.0
35.	5.18.4	EPA SRS	The system shall support the Complete CMS Plan report.	ICIS-Air version 1.0
36.	5.1.7, 5.18.4	EPA SRS	The system shall support the CMS Illogical Assignments report.	ICIS-Air version 1.0
37.	5.18.4	EPA SRS	The system shall support the Sources Not Evaluated within the Negotiated CMS Frequency report.	ICIS-Air version 1.0
38.	5.18.4	EPA SRS	The system shall support the Sources with no CMS Flag report.	ICIS-Air version 1.0
39.	5.11.9	EPA SRS	The system shall support the Universe of Federally Reportable Facilities report.	ICIS-Air version 1.0
40.	N/A		The system shall support the Sources within Nonattainment Areas report.	ICIS-Air version 1.0
41.	5.18.7	EPA SRS	The system shall support the Activity Reports: • Full Compliance Evaluations (FCEs) • Partial Compliance Evaluations (PCEs) • Investigations • Information Requests • Stack Tests • Title V Annual Compliance Certifications (TV ACC) • Continuous Emissions Monitoring (CEM)/Excess Emissions Reports (EERs).	ICIS-Air version 1.0
42.	5.11.12	EPA SRS	The system shall support the Facilities Reporting Violations report.	ICIS-Air version 1.0
43.	5.11.12	EPA SRS	The system shall support the Notice of Violation report.	ICIS-Air version 1.0
44.	5.18.3	EPA SRS	The system shall support the Enforcement Actions report.	ICIS-Air version 1.0
45.	5.27.3	EPA SRS	The system shall support the System Administration reports.	ICIS-Air version 1.0

3.11.2 Ad Hoc Reporting

Legacy AFS provided users with limited ad-hoc reporting capabilities, including querying records and summarizing data into milestones. ICIS-Air will allow users to create customized reports not available as standard reports by using data elements from the reporting universe. The use of a reporting universe will allow users to create customized reports without having to possess technical knowledge of the complexities of the database. The universes will allow users to retrieve the data that interests them by using familiar business terminology.

For ICIS-Air Ad Hoc reporting, an ETL process will be used to populate a reporting database. The ETL Process will both protect the operational database and enhance reports performance.

The ETL will be run as close to real-time as possible, so that reports accurately reflect the operational data. Users will have the ability to report on Air-only data, as well as Air data in combination with FE&C and/or NPDES data. Any data element in the system that appears on the graphical user interface screen will be reportable in Ad Hoc reporting. Additionally, users will have the ability to report on reference table contents. Pre-built filters/prompts will allow users to easily narrow queries by certain criteria (e.g., geography, data owner, program). The reporting tool will enforce sensitive data and other access restrictions.

3.11.2.1   Reporting Interface

The ICIS-Air reporting tool will provide a semantic layer that translates database names into Business language names and that serves as the layer between the user and the data for ad hoc reporting. The information will be organized into Business Areas that correlate to individual modules. The following lists notional Air business areas and subareas that will be available in the ICIS-Air ad hoc reporting solution.

- **Facility**
  - Compliance Monitoring Strategy
  - Current Air Programs and Subparts
  - Air Program Operating Status History
  - Current Air Pollutants
  - Air Pollutant Classification History
  - Wood Stoves Certifications
  - Linked Compliance Monitoring (CM) Activities
  - Linked Alleged Violation Files(AVFs)
  - Linked Enforcement Actions (EAs)
- **PCEs/FCEs**
  - Air Programs and Subparts
  - Pollutants
  - Linked CM Activities
  - Linked AVFs
  - Linked EAs
- **Investigations**
  - Air Programs and Subparts
  - Pollutants
  - Linked CM Activities
  - Linked AVFs
  - Linked EAs
- **Information Requests**
  - Air Programs and Subparts
  - Pollutants
  - Linked CM Activities
  - Linked AVFs
  - Linked EAs
- **Stack Tests**
  - Air Programs and Subparts
  - Pollutants

- – Linked CM Activities
- – Linked AVFs
- – Linked EAs
- **TV ACCs**
  - – Air Programs and Subparts
  - – Pollutants
  - – Review History
  - – Linked CM Activities
  - – Linked AVFs
  - – Linked EAs
- **Alleged Violation Files**
  - – High Priority Violations (HPV)
  - – Federally Reportable Violations (FRV)
  - – Non-FRV
  - – Linked CM Activities
  - – Linked EAs
- **Enforcement Actions**
  - – Informal
  - – Formal
  - – Linked CM Activities
  - – Linked AVFs
  - – Linked EAs
- **Air Permits**

Linkages

Ad hoc reporting will provide users the ability to report on relationships between data. Through the use of ad hoc reports, users will be able to generate reports that show HPV Pathways, all Activities associated with a Facility, all Facilities/Activities associated with an LCON, etc. Table 3.11-2 provides a list of possible entity linkages.

Table 3.11-2. ICIS-Air Ad Hoc Reports Entity Linkages

Entity	Linkages
FCEs, PCEs, Investigations, Information Requests	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
Stack Tests	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions

Entity	Linkages
TV ACCs	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
CEMs/EERs	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions
Wood Stoves	FCEs, PCEs, Investigations, Information Requests Alleged Violation Files Enforcement Actions
Alleged Violation Files	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Enforcement Actions
Enforcement Actions	FCEs, PCEs, Investigations, Information Requests TV ACCs Stack Tests CEMs/EERs Alleged Violation Files Enforcement Actions

Prompts and Filters

Ad hoc reporting will provide pre-built prompts and filters to assist the user in developing queries using common query criteria. Table 3.11-3 provides a list of sample pre-built criteria.

Table 3.11-3. ICIS-Air Notional Pre-Built Reporting Criteria

Criteria	Description
Facility Region	Region associated with the facility
Facility State	State associated with the facility
Facility LCON	LCON associated with the facility
Facility County	County associated with the facility
Nonattainment Area	Nonattainment area name(s) associated with the facility
Facility Name	Current or historical facility name
Facility Identifier	Programmatic Facility unique identifier
FRS Identifier	FRS unique facility site identifier
Facility Corporate Entity	Corporate Entity associated with the facility
Facility Current Default Classification	Default facility classification
Facility Current EPA Classification	EPA facility classification
Facility Current Delegated Agency Classification	Delegated Agency facility classification
Facility Current Pollutants	Pollutant(s) associated with the facility
Facility Current Air Programs	Program(s) associated with the facility
Facility Current Subparts	Subparts associated with the facility
Facility Current Operating Status	Most "active" current operating status of the facility's programs
Facility Universe	Reporting universe(s) associated with the facility
Activity Performed By Region	Region performing the activity (if an EPA activity)

Criteria	Description
Activity Performed By State	State performing the activity (if a State activity)
Activity Performed By LCON	LCON performing the activity (if an LCON activity)
Activity Pollutant	Pollutant(s) associated with the activity
Activity Program	Program(s) associated with the activity
Activity Subpart	Subparts associated with the activity
Include Sensitive Data? (Y/N)	Includes/excludes sensitive data; users without the sensitive data privilege will never be able to include sensitive data in report results

3.11.3 Standard Reporting

Legacy AFS offered users 12 standard fixed format reports which were generated from the operational database. There will be standard components to these reports:

- Header/Footer
- Input Criteria
- Sort Order.

The following sections discuss each of these components in more detail.

Header/Footer

Standard Reports will have standard header and footer content, as documented in the Functional Requirements. The footer will contain pagination information (e.g., page X of XX), while standard header information shall include the following information:

- Input Criteria
- Created Date
- Refresh Date
- Created By
- Report Title
- EPA logo
- Sensitive Data Indicator.

Input Criteria

As noted in the Functional Requirements for all Standard Reports, users will have the option of filtering results for all reports by General Facility, Geographic Criteria, and Activity Criteria. Table 3.11-4 lists the Standard Facility and Geographic Input Criteria that will be available on all standard reports in addition to report-specific input criteria. Table 3.11-5 lists the standard Activity input criteria that will be available on all standard reports in addition to report-specific input criteria. For Individual standard reports, users will have the option of entering additional input criteria befitting the specifications of the report. The criteria will be built to default to "All values" so that users do not have to enter specific criteria in a report unless those are the criteria they wish to use.

Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria

Criteria	Logic
Facility City	Users may select to retrieve information from multiple cities.
Facility Region	Users may select to retrieve information from multiple regions.
Facility State	Users may select to retrieve information from multiple states.

Criteria	Logic
Facility LCON	Users may select to retrieve information from a single or multiple LCONs, which could comprise data from across States and/or Regions.
Facility County	Users may select to retrieve information from a multiple counties.
Tribal Land	Users may select to retrieve information from a single or multiple Tribal Lands, which could comprise data from across States and/or Regions.
Nonattainment Area	Users may select to retrieve information from a single or multiple attainment areas. Users may select areas by General Area Name (as categorized in the EPA Greenbook).
Facility Name	For every report, both standard and ad hoc, users have the ability to limit the report to one or more Facility Names.
Facility Identifier	For every report, both standard and ad hoc, users have the ability to limit the report to one or more Facility IDs.
Facility Current Default Classification	Facility Default Classification is based upon the most stringent Pollutant Classification.
Facility Current EPA Classification	Facility EPA Classification is based upon the most stringent Pollutant Classification entered by the EPA.
Facility Current Delegated Agency Classification	Facility Delegated Agency Classification is based upon the most stringent Pollutant Classification entered by the State.
Facility Current Pollutants	Facilities may be associated with multiple pollutants.
Facility Current Operating Status	Facility Default Operating Status is based upon the most "active" Program Operating Status.
Facility Current Air Programs and Subparts	Facilities may be associated with multiple Air Programs and subparts. Should the user select to include multiple Air Programs in the report, Air Programs will be arranged by operating status, grouped with all applicable air program subparts.
Facility Type	Facilities may be associated with multiple reporting Universes.

Table 3.11-5. ICIS-Air Standard Activity Input Criteria

Criteria	Logic
Performed By Region	Users may select to retrieve information from multiple regions.
Performed By State	Users may select to retrieve information from multiple states.
Performed By LCON	Users may select to retrieve information from a single or multiple LCONs, which could comprise data from across States and/or Regions.
Activity Program	Activities may be associated with multiple Programs. Should the user select to include multiple Programs in the report, Programs will be arranged by Name/Type.
Activity Subpart	Activities may be associated with multiple Subparts. Should the user select to include multiple Subparts in the report, Subparts will be arranged by Name/Type.
Activity Pollutant	Activities may be associated with multiple pollutants.

Sort Order

The following standard sort order will be applied to each standard report, followed by the report-specific sort:

- Facility Region ascending
- Facility State ascending
- Facility LCON ascending.

3.11.3.1 Critical Data Element Report

Report Description

The Critical Data Element Report will be comprised of six individual reports that are oriented around changes to Facilities and/or their activities within a geographic region and categorized according to module. The module specific data will be displayed on separate tabs. Users will have the ability to limit report results for changes that occurred during a specific period and to filter search results by certain Geographic criteria (e.g., Region, State, LCON). After the user has entered the input criteria and the report is run, it will show the users all Facilities that have one or more changes within the user-specified parameters and the data that have those changes. The report will be organized by Facility Identifier, with data elements of each of the specific changes populating the appropriate tabs.

The Legacy system required users to Equal/Unequal for each of the values they wished to retrieve; "E" included all data, while a "U" excluded all data for the specific criteria. ICIS-Air will not require users to list equal/unequal, as the Critical Data Element Report will not list old and new values.

Report Logic

Table 3.11-6 lists the conditions under which a Facility is deemed changed, as categorized by tab. Any facility that meets one or more of the report logic criteria in combination with the input criteria (see below) will be retrieved for the report.

Table 3.11-6. Critical Data Element Report Logic

Report Tab	Record Change	Report Logic
Added Facility	A new Facility is added	The system will identify all recently added Facilities by a Created Date that falls in the user-specified date range.
Updated Facility	A Facility's operating status is changed OR A Facility's classification is changed OR A Facility's name is changed OR Input from the ERT has been received.	The system will identify all Facility Level Operating Status and Classification changes by Start Date. The report will display historical Operating Status and Classification, as well as Start and Shutdown Date, within the user specified date range. Facilities receiving input from the ERT will be identified by the presence of the Most Recent Date ERT Data Received on the Facility record.
New CMS	A new CMS record is added to a Facility.	The system will identify all added CMS records by CMS Created Date.
Updated CMS	A change to an existing CMS record: – User change to the CMS Category – User change to the CMS Frequency – User change to Facility on the CMS Plan – Change to the CMS Status – Change to the Latest FCE Date – A Facility is removed from a CMS Plan	The system shall identify all Facilities with a change to the CMS by the updated date on the CMS record and/or the inactivation date for the CMS record,[27] displaying the high level Facility record data, the current CMS record, and the historical CMS records.
New Compliance Monitoring Activities	New Activities are added: – Full Compliance Evaluation – Partial Compliance Evaluation – Stack Tests – Investigations – Title V ACC – CEM/EER	The system shall identify all facilities with new Activities that fall within the user specified date range. The report will list all new activities for each specified Facility, categorized by Activity type according to the activities' created date.
New Alleged Violation Files	A new Alleged Violation File has been added	The system shall identify all Facilities that have been linked to an Alleged Violation File according to the created date of the Alleged Violation File.
New Enforcement Actions	A new enforcement action is added against a Facility	The system shall identify all Facilities that have had Enforcement Actions data entered against it according to the created date of the Enforcement Action record.

Report Criteria

The Critical Data Element Report is executed based upon two input parameters: date range and geography. Depending on the user selected input criteria, the report will generate all changes to existing Facility records, organized by category. The details of the reporting data requirements are outlined in Table 3.11-7. The details of the data elements that will be displayed in the report are outlined in Table 3.11-8.

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[27] Changes resulting from background processing will not show up on the CMS tab. Only changes associated with a user ID will be displayed.

Table 3.11-7. Critical Data Element Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Standard Activity Input Criteria	See Table 3.11-5. ICIS-Air Standard Activity Input Criteria
Start Date	Display in mm/dd/yyyy format
End Date	Display in mm/dd/yyyy format
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report

Table 3.11-8. Critical Data Element Report Data

ICIS-Air Data Element	Values and Rules
Added Facility	
Facility ID	Display
FRS ID	Display
Default Classification	Display Code and Description Display Code and Description
Facility Name	Display
Primary SIC	Display Code and Description
Primary NAICS	Display Code and Description
Government Ownership	Display Code and Description
Current Default Classification	Display Code and Description
Air Programs –table of current programs	
Air Program	Display Code and Description
Current Operating Status	Display Status
Current Start Date	Display in mm/dd/yyyy format
Current Shutdown Date	Display in mm/dd/yyyy format
Updated Facility	
Facility ID	Display
FRS ID	Display
Default Classification	Display Code and Description
Facility Name	Display
Primary SIC	Display Code and Description
Primary NAICS	Display Code and Description
Government Ownership	Display Code and Description
Current Default Classification	Display Code and Description
Facility Name History	
Previous Facility Name	Display Description
Date Name Changed	Display in mm/dd/yyyy format
Air Programs –table of current programs	
Air Program	Display Code and Description
Current Operating Status	Display Status
Current Start Date	Display in mm/dd/yyyy format
Current Shutdown Date	Display in mm/dd/yyyy format
Air Programs –table of historical program status – displayed beneath each current program	
Historical Operating Status	Display Code and Description
Historical Start Date	Display in mm/dd/yyyy format
Historical Shutdown Date	Display in mm/dd/yyyy format

ICIS-Air Data Element	Values and Rules
Classification History	
Historical Default Classification	Display Status
New Compliance Monitoring Strategy (CMS)	
Current CMS Category	Display Code and Description
Current CMS Frequency	Display
Current CMS Effective Frequency	Display on
Current Active on Agency CMS Plan	Display Code and Description
Current Date Removed from Agency CMS Plan	Display in mm/dd/yyyy format
CMS Origination Date	Display in mm/dd/yyyy format
CMS Effective Date	Display in mm/dd/yyyy format
Next FCE Due Date	Display in mm/dd/yyyy format
Current CMS Start Date	Display in mm/dd/yyyy format
Current CMS Status	Display Code and Description
Current Reason for Changing CMS Category	Display
Planned Evaluation Data	
Planned Evaluation Fiscal Year	Display in yyyy
Planned Evaluation On or Off Site Visit	Display Code and Description
Planned Evaluation Comments	Display Description
Updated CMS	
Current CMS Category	Display Code and Description
Reason for Changing CMS	Display Code and Description
Current CMS Frequency	Display
Current CMS Effective Frequency	Display on
Current Active on Agency CMS Plan	Display Code and Description
Current Date Removed from Agency CMS Plan	Display in mm/dd/yyyy format
CMS Origination Date	Display in mm/dd/yyyy format
CMS Effective Date	Display in mm/dd/yyyy format
Next FCE Due Date	Display in mm/dd/yyyy format
Current CMS Start Date	Display in mm/dd/yyyy format
Current CMS Status	Display Code and Description
Current Reason for Changing CMS Category	Display
Planned Evaluation Data	
Planned Evaluation Fiscal Year	Display in yyyy
Planned Evaluation On or Off Site Visit	Display Code and Description
Planned Evaluation Comments	Display Description
Historical CMS values	
Historical CMS FY	Display yyyy
Historical CMS Category	Display Code and Description
Historical CMS Frequency	Display
Historical CMS Effective Frequency	Display on
Historical Active on Agency CMS Plan	Display Code and Description
Historical Date Removed from Agency CMS Plan	Display in mm/dd/yyyy format
Historical CMS Start Date	Display in mm/dd/yyyy format
Historical CMS Status	Display Code and Description
Historical Reason for Changing CMS Category	Display
Activities: FCE, PCE, Investigations	
Compliance Monitoring Activity Type	Display Code and Description
Compliance Monitoring Activity Name	Display Description

ICIS-Air Data Element	Values and Rules
Compliance Monitoring Type	Display Code and Description
Compliance Monitoring Action Reason	Display Code and Description
Compliance Monitoring Agency Type	Display Code and Description
Compliance Monitoring Agency Name	Display
Actual Start Date	Display in mm/dd/yyyy format
Actual End Date	Display in mm/dd/yyyy format
Sensitive Activity?	Display Y/N
Law/Section/Program	
Federal Statute	Display Code and Description
Law Section	Display Code and Description
Program	Display Code and Description
Activities: Continuous Emissions Monitor (CEM) and Excess Emission Reports (EERs)	
CEM Identifier	Display
Reporting Period Start Date	Display in mm/dd/yyyy format
Reporting Period End Date	Display in mm/dd/yyyy format
Pollutant	Display Code and Description
Emissions Point ID	Display
Activities: Stack Tests	
Stack Test Identifier	Display
Date Test Completed	Display in mm/dd/yyyy
Activities: Title V Annual Compliance Certification (TV ACC)	
Permit Identifier	Display
Review Period Start Date	Display in mm/dd/yyyy
Review Period End Date	Display in mm/dd/yyyy
New Alleged Violation Files	
Alleged Violation File Identifier	Display
Alleged Violation File Name	Display Description
Policy Indicator	Display
Policy Indicator Date	Display in mm/dd/yyyy
Status	Display Code and Description
Status Date	Display in mm/dd/yyyy
Sensitive Activity?	Display Y/N
New Enforcement Actions	
Enforcement Action Identifier	Display
Enforcement Action Name	Display Description
Enforcement Action Type	Display Code and Description
Sensitive Activity?	Display Y/N
Milestones	
Enforcement Action Milestone	Display Code and Description
Milestone Actual Date	Display in mm/dd/yyyy

Report Sorting

The report shall sort by:

- Standard Report Sort
- Facility Identifier

The module-specific information will be sorted as indicated.

- **Compliance Monitoring Strategy**

  Within each Facility, additions to the Compliance Monitoring Strategy will only display one row per Facility.

  Within each Facility, updates to the Compliance Monitoring strategy will display multiple historical rows per facility. The information will be arranged as follows: Facility, Current CMS, Historical CMS rows descending by Fiscal Year

- **Activities**

  Within each Facility Group, activities will be grouped and ordered by Activity Type. The Activity groups will be ordered as follows**:**
  - Full Compliance Evaluation
  - Partial Compliance Evaluation
  - Stack Tests
  - Investigations
  - Information Requests
  - TV ACC
  - Enforcement Actions
  - CEM/EER

  Within each Activity Group, Activities will be ordered by Created date ascending in chronological order.

- **Alleged Violation Files**

  Within each Facility Group, Alleged Violation Files will be grouped and sorted by Created date ascending in chronological order

- **Enforcement Actions**

  Within each Facility Group, Enforcement Actions will be grouped and sorted by Created date ascending in chronological order

3.11.3.2   Comprehensive Compliance Monitoring Strategy (CMS) Report

Report Description

The Comprehensive Compliance Monitoring Strategy (CMS) Report will be comprised of three individual reports that are oriented around a Facility's inclusion on a CMS Plan. The module specific data will be displayed on separate tabs. Users will have the ability to limit report results for changes that occurred during a specific period and to filter search results by certain Geographic criteria (e.g., Region, State, LCON). After the user has entered the input criteria and the report is run, it will show all Facilities that have one or more changes within the user-specified parameters and the data that have those changes. The report will be organized by Facility Identifier, with data elements of each of the specific changes populating the appropriate tabs.

Report Logic

Table 3.11-9 lists the CMS report logic for each report tab.

Table 3.11-9. CMS Report Logic

Report Tab	Report Description	Report Logic
Compliance Monitoring Strategy (CMS) Plan	The Compliance Monitoring Strategy (CMS) Plan Report will identify all Facilities currently Active within a CMS Plan and their corresponding current CMS record. This report will also include information on the status of the Facility's evaluations. Each CMS record is unique to a single Facility, identified by the Facility identifier. Only CMS records indicated to be "Active", as indicated in the 'Active on Agency CMS Plan' field, will be listed in the report. This report can only be run by users with the sensitive data privilege and on the cover sheet will say that the report contains sensitive data.	The report will pull all facilities that are currently on an active CMS plan.
CMS Illogical Assignments	The CMS Illogical Assignment Report identifies Facilities whose CMS categories do not match the actual Facility classification. For example, if a minor source has been identified with a CMS Category of S-80% Synthetic Minor Source, the Facility will be displayed on the report. Additionally, major sources that do not have a CMS category will be included on this report.	In ICIS-Air, the CMS Illogical Assignment Report will identify illogical CMS category assignments according to the logic in Table 3.11-10.
Sources Not Evaluated Within Negotiated CMS Frequency	This report provides a list of all sources that are not evaluated within their negotiated CMS frequency. The Report will generate a list of all sources with a status of Overdue. In addition to viewing sources that currently have a CMS Status of Overdue, users will be able to view historical Overdue CMS Status by targeting a specific date range.	This report will pull all facilities with a current CMS Status of Overdue, or if the user specifies a historical FY, all the facilities with an overdue status for that fiscal year. For more information on how the CMS Status is generated, see the CMS module.

The table below displays the logic for the CMS Illogical Assignment Report. The report will display Facilities where the CMS Category does not correspond to the matching Facility Default Classification listed in Table 3.11-10.

Table 3.11-10. ICIS-Air CMS Illogical Assignment Report Logic[28]

Facility Default Classification	CMS Category
Major	A: Title V Major D: EPA Oversight for Non-Tribal Lands at Mega Sources E: EPA Authority/Oversight for Tribal Lands at Major Source F EPA Oversight for Non-Tribal Lands at Major Sources G EPA Authority/Oversight for Tribal Lands at Mega Sources M Mega-Site
Synthetic Minor	N EPA Authority/Oversight for Tribal Lands at 80% Synthetic Minor Sources S 80% Synthetic Minor Y EPA Oversight for Non-Tribal Lands at 80% Synthetic Minor Sources
Minor	O: State/Local Agency Oversight at Other/Alternative Sources X EPA Oversight for Non-Tribal Lands at Other/Alternative Sources Z: EPA Oversight for Tribal Lands at Other/Alternative Sources
Unknown	O: State/Local Agency Oversight at Other/Alternative Sources X EPA Oversight for Non-Tribal Lands at Other/Alternative Sources Z: EPA Oversight for Tribal Lands at Other/Alternative Sources

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[28] Subject to change based on EPA updates

Report Criteria

The Comprehensive CMS Report will use a single set of input criteria for all three reporting tabs. The details of the input parameters are outlined in Table 3.11-11. The details of the data elements that will be displayed for each tab in the report are outlined in Table 3.11-12.

Table 3.11-11. Comprehensive CMS Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Historical Fiscal Year	Display in yyyy
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report

Table 3.11-12. Comprehensive CMS Report Data

ICIS-Air Data Element	Values and Rules
Compliance Monitoring Strategy Plan	
Facility ID	Display
FRS ID	Display
Default Classification	Display Code and Description Display Code and Description
Facility Name	Display
CMS Identifier	Display
CMS Category Code and Description	Display Code and Description
CMS Status	Display
Reason for Changing CMS	Display
CMS Frequency	Display
CMS Effective Frequency	Display
CMS Origination Date	Display in mm/dd/yyyy
CMS Start Date	Display in mm/dd/yyyy
CMS Effective Date	Display in mm/dd/yyyy
Next FCE Due Date	Display in mm/dd/yyyy
Active on Agency CMS Plan	Display as Active or Inactive
Date Removed from Agency CMS Plan	Display in mm/dd/yyyy
Planned Evaluation Data	
Planned Evaluation Fiscal Year	Display in yyyy
Planned Evaluation On or Off Site Visit	Display Status
Planned Evaluation Comments	Display
CMS Illogical Assignments Report	
Facility ID	Display
FRS ID	Display
Facility Name	Display Description
Default Classification	Display Code and Description
CMS Category	Display Code and Description
Date Last FCE	Display in mm/dd/yyyy format
Sources Not Evaluated within Negotiated CMS Frequency	
Facility Identifier	Display
Facility Name	Display Description
CMS Identifier	Display
CMS Category Code and Description	Display Code and Description
CMS Status	Display Status

ICIS-Air Data Element	Values and Rules
Reason for Changing CMS	Display Description
CMS Frequency	Display Value
CMS Effective Frequency	Display Value
CMS Origination Date	Display in mm/dd/yyyy
CMS Start Date	Display in mm/dd/yyyy
CMS Effective Date	Display in mm/dd/yyyy
Next FCE Due Date	Display in mm/dd/yyyy
Active on Agency CMS Plan	Display Status
Date Removed from Agency CMS Plan	Display in mm/dd/yyyy
Current Reason for Changing CMS Category	Display
Planned Evaluation Data	
Planned Evaluation Fiscal Year	Display in yyyy
Planned Evaluation On or Off Site Visit	Display Code and Description
Planned Evaluation Comments	Display Description
Historical CMS values	
Historical CMS FY	Display yyyy
Historical CMS Category	Display Code and Description
Historical CMS Frequency	Display
Historical CMS Effective Frequency	Display on
Historical Active on Agency CMS Plan	Display Code and Description
Historical Date Removed from Agency CMS Plan	Display in mm/dd/yyyy format
Historical CMS Start Date	Display in mm/dd/yyyy format
Historical CMS Status	Display Code and Description
Historical Reason for Changing CMS Category	Display

Report Sorting

The report shall sort by:

- Standard Report Sort
- Facility Identifier

The module-specific information will be sorted as indicated.

- Compliance Monitoring Strategy (CMS) Plan

Facilities will be sorted by Facility ID.

- CMS Illogical Assignment

Facility Classification, in the following order

- Major
- Synthetic Minor 80%
- Synthetic Minor
- Part 61 NESHAP Minor
- Minor
- Facility Identifier, ascending.
- Sources Not Evaluated within Negotiated CMS Frequency

Facilities will be sorted by Facility ID. Historical CMS rows for a facility will be sorted by FY, descending.

3.11.3.3   Sources with No CMS Flag Report

Report Description

This report provides users with a list of Facilities classified according to user-selected category, that are currently not active on a CMS Plan. The Source Classification input criteria will be defaulted to Major.

Report Logic

The system shall identify all facilities that match the source classification identified in the input criteria and that meet the logic in Table 3.11-13.

Table 3.11-13. Identify Sources with No CMS Report Logic

Major Source	Logic
Facility has a CMS row that is currently not Active on Agency CMS Plan	Active on Agency CMS Plan = N and Date Removed from Plan is <= input Start Date and there is no current active CMS row
Facility does not have a CMS plan record	Facility ID not in the CMS records table

Report Criteria

The Sources with No CMS Report is executed based upon the criteria input by the user. The details of the Report Criteria are outlined in Table 3.11-14. The details of the data elements that will be displayed in the report are outlined in Table 3.11-15.

Table 3.11-14. Sources with No CMS Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria

Source Default Classification	• Valid Values
	  – Major
	  – Synthetic Minor 80%
	  – Synthetic Minor
	  – Part 61 NESHAP Minor
	  – Minor
	• Source Classification will be defaulted to Major

Table 3.11-15. Sources with No CMS Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Default Classification	Display Code and Description
Facility Name	Display Description
CMS Category	Display Code and Description
Active on Agency CMS Plan	Display Active or Inactive
Date Removed from Agency CMS Plan	Display in mm/dd/yyyy format

Report Sorting

The report will be sorted by:

- Standard Report Sort
- Category as follows
  - Facility not currently active
  - Facility does not currently have a CMS plan
- Facility Identifier, ascending.

3.11.3.4 Universe of Federally Reportable Facilities Reports

Report Description

Legacy AFS maintained a universe of sources considered "Federally Reportable". Federally Reportable sources are those which exceed (Major Sources) or have the potential to exceed (Synthetic Minor Sources) a pollutant's major emission threshold; operating Part 61 National Emission Standard for Hazardous Air Pollutant (NESHAP) sources regardless of emission level, sources identified within the Compliance Monitoring Strategy (CMS) plan, any facility with a formal enforcement action, and any facility with an active HPV.

Report Logic

In ICIS-Air, universe categorizations will directly correspond to Default Classification. The Universe Reports will generate a list of Facilities within a specific universe according to Default Classification. Facilities with a CMS Plan, Formal Enforcement Actions, and Active Alleged Violations also will be captured. To ensure that Facilities are not repeated, columns within the report will indicate how it is federally reportable (e.g CMS Plan, Enforcement Action, Active Alleged Violation File).

Table 3.11-16 lists the conditions under which a Facility is included in the Universe Report.

Table 3.11-16. Universe Report Logic

Criterion	Description
Major Sources	Facilities with a Default Classification of Major
Part 61 NESHAP Minor Sources	Facility has a NESHAP Air Program, and thus has a Default Classification of Part 61 NESHAP Minor
Synthetic Minor	Facilities with Default Classification of Synthetic Minor
Minor with CMS Plan	Facility with a Default Classification of Minor and an Active CMS Plan
Minor Sources with Enforcement Action	Facility with a Default Classification of Minor and Enforcement Action within the past five fiscal years
Minor Sources with Active HPV	Facility with a Default Classification of Minor and Active HPV identified by no Resolving Action Date

Report Criteria

The Universe Report is executed based upon user entered input criteria. Depending on the user selected input criteria, the report will generate all Facilities within a Universe, organized by Default Classification. The details of the reporting data requirements are outlined in Table 3.11-17. The details of the data elements that will be displayed in the report are outlined in Table 3.11-18.

Table 3.11-17. Universe Report Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report

Table 3.11-18. Universe Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Default Classification	Display Code and Description
Facility Name	Display
Facility Default Classification	Display Code and Description
Facility Default Classification Start Date	Display in mm/dd/yyyy
Active on CMS Plan	Display Code and Description
Enforcement Action Identifier	Display
Milestone Actual Date	Display in m/dd/yyyy
Alleged Violation File Policy Indicator	Display Code and Description
Alleged Violation File Name	Display Code and Description
Alleged Violation File Identifier	Display

Report Sorting

The report will be sorted by:

- Standard Report Sort
- Facility Default Classification
  - Major
  - Synthetic Minor 80%
  - Synthetic Minor
  - Part 61 NESHAP Minor
  - Minor
- Facility Identifier

3.11.3.5   Sources within Nonattainment Areas

Report Description

This Report will generate a list of Facilities within a Nonattainment area. These data will be available at the Facility record level and will be derived from the EPA Green Book from the FRS transfer. The Facility level record will show both criteria pollutants that have been assigned to the Facility as well as criteria pollutants that currently have a nonattainment classification for the Facility's designated geographic location.

Report Logic

When a facility is pulled that has one or more criteria pollutants in a nonattainment area, the report will pull all criteria pollutants within the designated nonattainment area as of the input start date.

Report Criteria

The Sources within Nonattainment Areas Report is executed based upon the criteria input by the user. The details of the Report Criteria are outlined in Table 3.11-19. The details of the data elements that will be displayed in the report are outlined in Table 3.11-20.

Table 3.11-19. Sources within Nonattainment Areas Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Criteria Pollutant	Search by Code or Description
Start Date	Date in mm/dd/yyyy format from which the nonattainment area search should be performed

Table 3.11-20. Sources within Nonattainment Areas Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Default Classification	Display Code and Description
Facility Name	Display
Pollutants	
Pollutant	Display Code and Description
Attainment/Nonattainment Indicator	Display Code and Description
Date of Extraction from Greenbook	Display in mm/dd/yyyy

Report Sorting

- Standard Report Sort
- Most Severe Pollutant Nonattainment Status for a facility (calculated field based on "worst" pollutant for the facility):
  - Marginal
  - Moderate
  - Serious
  - Severe
  - Extreme
- Facility Identifier
- Criteria Pollutant
  - 1-Hr Ozone
  - 1997 8-Hr Ozone
  - Carbon Monoxide
  - Sulfur Dioxide
  - 2006 PM-2.5
  - 1997 PM-2.5
  - PM-10
  - 2008 Lead
  - 2010 Lead.

3.11.3.6 Activities Report

Report Description

The Activities Report is comprised of individual Activity reports are oriented around Activities that occur and/or are completed within a geographic region and categorized according to Activity Type. Each of the Activities is associated with a Facility. The report will be organized by Facility, with data elements for each of the specific Activities populated in separate tabs.

Report Logic

After the user has entered the input criteria and the report is run, it will return all the Activities that have occurred within the criteria. Table 3.11-21 lists Activities that can be entered against a Facility, categorized by module.

Table 3.11-21. Activities Report Logic

Module	Activity Record	Report Generation Logic
Full Compliance Evaluation	A new Full Compliance Evaluation is conducted for a Facility.[29]	The system shall identify all Full Compliance Evaluations that have been conducted within a given time frame. End Date must fall within the user designated time frame.
Partial Compliance Evaluation	A new Partial Compliance Evaluation is conducted for a Facility.	The system shall identify all Partial Compliance Evaluations that have been conducted within a given time frame. End Date must fall within the user designated time frame.
Investigation	A new Investigation is conducted for a Facility.	The system shall identify all Investigations that have been conducted within a given time frame. Either Actual Start or End Date must fall within the user designated time frame.
Stack Tests	A new Stack Test is conducted for a Facility.	The system shall identify all Stack tests that have been conducted within a given time frame. Date Test Results Reviewed must fall within the user designated time frame. Stack Test records will be uniquely identified by the Stack Test Identifier.
Title V Annual Compliance Certification	A TV ACC Review is conducted.	The system shall identify all TV ACCs within a given time frame. Review Period End Date must fall within the user designated time frame.
CEM/EER	An excess emissions report is conducted.	TBD pending finalization of CEM/EER electronic reporting regulations

Report Criteria

Depending on the user selected input criteria, the report will generate all activities for Facility records, organized by Activity Type. The input criteria for the report are outlined in Table 3.11-22. The details of the data elements that will be displayed in the report are outlined in Table 3.11-23.

Table 3.11-22. Activities Report Input Criteria

ICIS-Air Parameter	Values and Rules
Start Date	Display in mm/dd/yyyy format
End Date	Display in mm/dd/yyyy format
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Standard Activity Input Criteria	See Table 3.11-5. ICIS-Air Standard Activity Input Criteria

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[29] Facilities that are currently Inactive on a CMS Plan will be included in this report to ensure that all FCEs conducted are credited even if the Facility is no longer Active on a CMS Plan.

ICIS-Air Parameter	Values and Rules
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report

Table 3.11-23. Activities Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Facility Name	Display
Default Classification	Display Code and Description
Air Programs –table of current programs	
Air Program	Display Code and Description
Current Operating Status	Display Status
Current Start Date	Display in mm/dd/yyyy format
Current Shutdown Date	Display in mm/dd/yyyy format
Default Classification	Display Code and Description
Applicable Subparts	Display Code and Description
FCE, PCE, Investigations	
Unique Identifier	Display
Compliance Monitoring Activity Name	Display
Compliance Monitoring Type	Display Code and Description
PCE Type	Display Code and Description
Compliance Monitoring Actual Start Date	
Compliance Monitoring Actual End Date	
Compliance Monitoring Action Reason	Display Code and Description
Compliance Monitoring Agency Type	Display Code and Description
Compliance Monitoring Agency Name	Display
Air Programs	
Program	Display Code and Description
Program not on Facility	Calculated indicator of activity program not on parent facility
Pollutants	
Pollutant	Display Code and Description
Pollutant not on Facility	Calculated indicator of activity pollutant not on parent facility
Stack Tests	
Stack Test Identifier	Display
Date Test Results were Reviewed	Display in mm/dd/yyyy format
Data Imported from External System	Display Code and Description
Pollutant Tested	Display Code and Description
Test Result	Display Code and Description
Air Programs	
Program	Display Code and Description
Program not on Facility	Calculated indicator of activity program not on parent facility
Pollutants	
Pollutant	Display Code and Description
Pollutant not on Facility	Calculated indicator of activity pollutant not on parent facility
Title V Annual Compliance Certification (TV ACC)	
Permit Identifier	Display
Review Period End Date	Display in mm/dd/yyyy format
Facility Reported Status	Display Code and Description
Deviations	Display Code and Description

ICIS-Air Data Element	Values and Rules
Deviations with Excess Emissions	Display Code and Description
Air Programs	
Program	Display Code and Description
Program not on Facility	Calculated indicator of activity program not on parent facility
CEM/Excess Emission Reports	
CEM Identifier	Display
Pollutant	Display Code and Description
Emissions Point ID	Display

Report Sorting

The report will be sorted by:

- Standard Report Sort
- Facility Identifier
- Activity Date.

3.11.3.7   Facilities Reporting Violation

Report Description

The Facilities Reporting Violation report identifies Facilities that have been determined to have Alleged Violations within a timeframe.[30]   This report displays detailed violation type data about AFVs but does not display the full HPV Pathway (see the List of Active HPVs/FRVs/Non-FRVs Report for that level of detail).

Report Logic

The report will pull all facilities that meet the input criteria and have Alleged Violation Files that meet the input criteria. It will also pull the violation types for each Alleged Violation File.

Report Criteria

The Facilities Reporting Violations Report is executed based upon the criteria input by the user. The details of the Report Criteria are outlined in Table 3.11-24. The details of the data elements that will be displayed in the report are outlined in Table 3.11-25.

Table 3.11-24. Facilities Reporting Violation Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Policy Indicator Start Date	Display in mm/dd/yyyy format
Policy Indicator End Date	Display in mm/dd/yyyy format
Policy Indicator	Search by Code or Description
Policy Status	Search by Code or Description
AVF Status	Search by Code or Description

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[30] It should be noted that EPA and Delegated Agencies are working to update the HPV Policy. Changes to the HPV Policy could change the contents of the Facilities Reporting Violations Standard Report. The projected completion date of the HPV Policy update is January 2013.

Table 3.11-25. Facilities Reporting Violation Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Facility Name	Display
Alleged Violation File Identifier	Display
Alleged Violation File Name	Display
Alleged Violation File Policy Indicator	Display Code and Description
Alleged Violation File Policy Indicator Date	Display in mm/dd/yyyy format
Alleged Violation File Status	Display Code and Description
Alleged Violation File Status Date	Display in mm/dd/yyyy format
Violation Types	
Alleged Violation Type	Display Code and Description
Alleged Violation Type Policy Indicator	Display Code and Description
Start Date	Display in mm/dd/yyyy format
End Date	Display in mm/dd/yyyy format

Report Sorting

The report will be sorted by:

- Standard Report Sort
- Policy Indicator
  - HPV
  - FRV
  - Non-FRV
- Facility Identifier
- Violation Policy Indicator
- Violation Type.

3.11.3.8   List of Active HPVs/FRVs/Non-FRVs

Report Description

This report will show a summary tab of facilities with active HPV/FRV/Non-FRV by geography. It will have drill down capabilities to look at detailed Alleged Violation File pathway data for facilities.

Report Logic

The report will pull all Alleged Violation Files have a system generated status based upon linked activities. Alleged Violations Files with either a blank Resolution Date or a Resolution Date greater than the input date.

Report Criteria

The List of Active HPVs/FRVs/Non-FRVs Report will be executed based upon the criteria input by the user. The details of the Report Criteria are outlined in Table 3.11-26. The details of the data elements that will be displayed in the report are outlined in Table 3.11-27.

Table 3.11-26. Alleged Violations Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Standard Activity Input Criteria	See Table 3.11-5. ICIS-Air Standard Activity Input Criteria
Alleged Violation File Policy Indicator	Search by Code and Description
Alleged Violation File Status	Search by Code and Description
Resolution Date	Search by mm/dd/yyyy where AVF resolution date is null or > input criteria
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report

Table 3.11-27. Alleged Violations Report Data

ICIS-Air Data Elements	Values and Rules
Facility ID	Display
FRS ID	Display
Facility Name	Display
Alleged Violation File Identifier	Display
Alleged Violation File Name	Display
Alleged Violation File Policy Indicator	Display Code and Description
Alleged Violation File Policy Indicator Date	Display in mm/dd/yyyy format
EPA Policy Indicator Comment	Display Description
Alleged Violation File Status	Display Code and Description
Alleged Violation File Status Date	Display in mm/dd/yyyy format
Enforcement Sensitive Indicator	Display Code and Description
Alleged Violation Determination Date	Display in mm/dd/yyyy format
Violation Types	
Alleged Violation Type	Display Code and Description
Alleged Violation Type Policy Indicator	Display Code and Description
Start Date	Display in mm/dd/yyyy format
End Date	Display in mm/dd/yyyy format
Air Programs	
Program	Display Code and Description
Program not on Facility	Calculated indicator of AVF programs not on the parent facility
Pollutants	
Pollutant	Display Code and Description
Pollutant not on Facility	Calculated indicator of AVF pollutants not on the parent facility
National Initiatives	
National Initiative	Display Code and Description
Pathway Data	
Discovery Action Type	Display Code and Description
Discovery Action Date	Display in mm/dd/yyyy format
Notice Action Type	Display Code and Description
Notice Action Date	Display in mm/dd/yyyy format
Addressing Action Type	Display Code and Description
Addressing Action Date	Display in mm/dd/yyyy format
Resolving Action Type	Display Code and Description

ICIS-Air Data Elements	Values and Rules
Resolving Action Date	Display in mm/dd/yyyy format
Additional Data	
Comments	Display
User Defined Field 1	Display
User Defined Field 2	Display
User Defined Field 3	Display
User Defined Field 4	Display
User Defined Field 5	Display
User Defined Field 6	Display

Report Sorting

The report shall sort by:

- Standard Report Sort
- Policy Indicator:
    - HPV
    - FRV
    - Non-FRV
- Alleged Violation File Status
    - Unaddressed
    - Noticed
    - Addressed
    - Resolved
- Facility Identifier
- Alleged Violation Type
- Alleged Violation Type Policy Indicator:
    - HPV
    - FRV
    - Non-FRV.

3.11.3.9 Notice of Violation Report

Report Description

This report lists the notice(s) given for an Alleged Violation file.

Report Logic

The report will pull all Alleged Violation Files that have been linked to one or more notices to the facility. It will pull all AVFs linked to enforcement action types that are identified as notice types. Since an AVF can have more than one notice, the report will pull all notices and flag the notice that is used as the notice milestone using the criteria employed in the application to select the notice action.

Report Criteria

Once input criteria are entered, the system will generate a report identifying all Facilities with Alleged Violations with linked Notices within the confines of the user entered input criteria.

The details of the Report Criteria are outlined in Table 3.11-28. The details of the data elements that will be displayed in the report are outlined in Table 3.11-29.

Table 3.11-28. Notice of Violation Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report
Start Date	Display in mm/dd/yyyy
End Date	Display in mm/dd/yyyy
Alleged Violation File Policy Indicator	Search by Code or Description

Table 3.11-29. Notice of Violation Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Facility Name	Display
Alleged Violation File Identifier	Display
Alleged Violation File Name	Display
Alleged Violation File Status	Display Code and Description
Alleged Violation File Policy Indicator	Display Code and Description
Enforcement Sensitive Indicator	Display Y/N
Notices	
Notification Action Type	Display Code and Description
Notification Action Date	Display in mm/dd/yyyy
Notification Milestone Indicator	Calculated Field indicating which linked notification action is used as the milestone in the pathway

Report Sorting

The report will be sorted by:

- Standard Report Sort
- Facility Identifier
- Alleged Violation File Policy Indicator
  - HPV
  - FRV
  - Non-FRV
- Alleged Violation File Status
- Notice Date.

3.11.3.10 Enforcement Action Report

Report Description

This Report will generate a list of Facilities and their Enforcement Actions.

Report Logic

The report will pull all facilities that meet the input criteria and have EAs that meet the input criteria.

Report Criteria

The Enforcement Action Report is executed based upon the criteria input by the user. Once input criteria are entered, the system will generate a report identifying all Enforcement Actions that were entered within the confines of the user entered report constraints. The details of the Report Criteria are outlined in Table 3.11-30. The details of the data elements that will be displayed in the report are outlined in Table 3.11-31.

Table 3.11-30. Enforcement Action Report Input Criteria

ICIS-Air Parameter	Values and Rules
Standard Facility and Geographic Input Criteria	See Table 3.11-4. ICIS-Air Standard Facility and Geographic Input Criteria
Standard Activity Input Criteria	See Table 3.11-5. ICIS-Air Standard Activity Input Criteria
Enforcement Action Type	Search by Code and Description. Users will be able to select either Informal, Formal or both Enforcement Action types.
Include Sensitive Data? (Y/N)	If the user running the report has the sensitive data privilege, this is a criteria to allow the user to choose whether or not to return sensitive data in the report

Table 3.11-31. Enforcement Action Report Data

ICIS-Air Data Element	Values and Rules
Facility ID	Display
FRS ID	Display
Facility Name	Display
Enforcement Action Identifier	Display
Enforcement Action Name	Display
Enforcement Action Type	Display Code and Description
Final Assessed Penalty	Display formatted as $#,###
Air Programs	
Program	Display Code and Description
Program Not on Facility	Calculated indicator highlighting EA Programs that are not on the parent facility
Applicable Subparts	Display Code and Description
Pollutants	
Pollutant	Display Code and Description
Pollutant Not on Facility	Calculated indicator highlighting EA Pollutants that are not on the parent facility
Milestones	
Milestone Type	Display Code and Description
Milestone Actual Date	Display in mm/dd/yyyy format

Report Sorting

The report will be sorted by:

- Standard Report Sort
- Enforcement Action Identifier
    - Facility Identifier.

3.11.3.11 Proposed Additional Standard Reports

The following is a list of proposed Standard Reports to be included in ICIS-Air based upon the modernization of individual modules. These reports have not yet undergone a detailed requirements workup.

- System Administration Report to display summary of data entered by a user and shall include the following information:
  - User Name
  - User ID
  - Last Login
  - Active/Inactive
  - Number of records added/edited via Web during run-time criteria for date range
  - Number of records added/edited via Batch during run-time criteria for date range
- List of Missing Minimum Data Requirements (MDRs)
- List of Missing Pollutants
  - Report to see Pollutants report in Actions associated with a Facility, but are not recorded on the Facility record
  - Generated based on Facility Pollutant Start and Shutdowns versus Activity date
- State Review Framework
- Major or Mega Facilities missing FCEs
  - Report to see which facilities needs to be inspected this year
  - Report to see which facilities did not get inspected in X Fiscal Year
  - Facilities with Upcoming FCE Due Date X
  - Facilities with overdue onsite FCEs
- Stack Tests containing Pollutants with Pending statuses
- Continuous Emissions Monitoring
  - Excess Emission Report (EER)
  - EER Summary
- Wood Stoves Reports
- List of Accredited Testing Laboratories with Model Numbers
- List of EPA Certified Wood Heaters
- List of EPA Accredited Testing Laboratories
- List of 3rd party ISO Accredited Testing Laboratories
- Certification Review Status
- Manufacturer Contact Information that includes the following information:
  - Designated Representative
  - Telephone Number
  - Fax Number
  - Company Name
  - Address
  - EIN for domestic manufacturers
  - FRS.

3.12 HELP

In the legacy system, users received assistance by directly contacting EPA Headquarters. The modernized system will expand upon the existing ICIS help functionality, providing more specific and targeted support to the users. The Help functionality will be available to all users and will include schema information for each data element as well as specific module information, oriented towards assisting users with schema submittal. The Help functionality

outlined in this document is a content independent infrastructure, outlining users help needs. Specific help content, including error messages, will be written during later phases of modernization.

3.12.1 Summary of Help Modernization in ICIS-Air

Some Help functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows.

- **Enhanced Help**

  EPA envisions expanding upon the existing ICIS Help, which provides page-sensitive data, to provide information down to the field sensitive level. This enhanced functionality could leverage such technologies as mouseovers, click-on field names that pop-up help descriptions, etc. A separate module will discuss onscreen indications of MDR data elements.

- **Integrated User Support Tools**

  EPA envisions a robust set of integrated user support functions, incorporated into a central dashboard to provide the users with seamless user support. The following functionalities could be incorporated into the modernized system via a central dashboard:
  - Phone Support
  - Video/Web Training and tutorials
  - Live chat with users
  - Automation of access to information (i.e., Policy Information).

The following sections discuss the details behind these modernization features and the requirements, functionality, data elements, and business rules that will support the Help module in ICIS-Air.

3.12.2 Help Functional Requirements

Table 3.12-1 lists the requirements that apply to Help. It includes functions that are allowed and business rules within a function.

Table 3.12-1. ICIS-Air Help Functional Requirements

ID	Client Req ID	Source Reference	Requirement	Planned Release
1.	5.25.1	EPA SRS	The system shall allow the users to access on-line Help information.	ICIS-Air version 1.0
2.	5.17.5, 5.24.1, 5.24.2, 5.25.1	EPA SRS	The system shall provide the user context-specific information, definitions, and specific business rules depending upon the system location through which Help was accessed.	ICIS-Air version 1.0
3.	N/A		The system shall allow the user to navigate to additional Help topics.	ICIS-Air version 1.0
4.	N/A	Tier 3 3/15/2012	The system shall allow users to access Contact information (i.e., Phone support) via a link on the Help module.	ICIS-Air version 1.0
5.	5.23.3, 5.24.5, 5.25.1, 5.25.3, 5.29.8	EPA SRS	The system shall allow users to access Video/Web Training and tutorials/user guides for modules via a link in Help.	ICIS O&M

ID	Client Req ID	Source Reference	Requirement	Planned Release
6.	N/A	SME 2/27/2012	The system shall provide an interface that allows users to interact with EPA representatives in real time (i.e., live chat) via a link on the Help module.	ICIS O&M
7.	5.24.4	EPA SRS	The system shall provide an interface that allows for automatic updates of certain information mandated by the user (e.g., policy information, etc.)	ICIS-Air version 1.0
8.	5.4.3, 5.4.7, 5.24.3	EPA SRS	The system shall provide online role-based access to the system data dictionary including a legacy code where applicable, full value name, acronym (if applicable), description, type of code, comment field, date created, last date modified, date retired, created by, modified by, flag field of at least five characters.	ICIS-Air version 1.0
9.	5.25.1	EPA SRS	The system shall make documentation on XML schemas and training accessible on-line.	ICIS-Air version 1.0

3.12.3 Help—Web Only

Users can access the Help screen by click on the 'Help' hyperlink located on the upper right hand corner of the web screen.

Figure 3.12-1 illustrates the Robohelp screen in the existing ICIS system.

Figure 3.12-1. ICIS Help: Robohelp
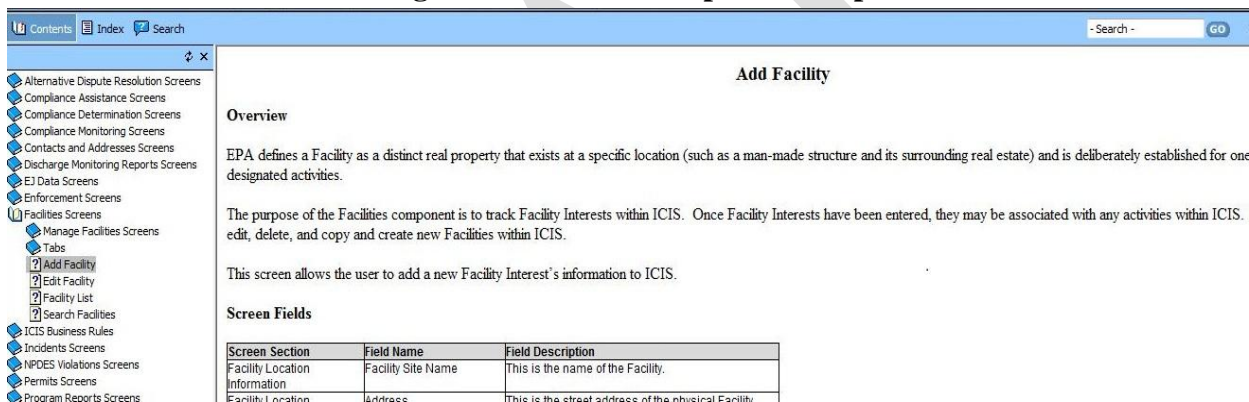
Figure 3.12-2. Notional Screen: Enhanced Help illustrates an example of the Help Screen with advanced functionality.

Figure 3.12-2. Notional Screen: Enhanced Help
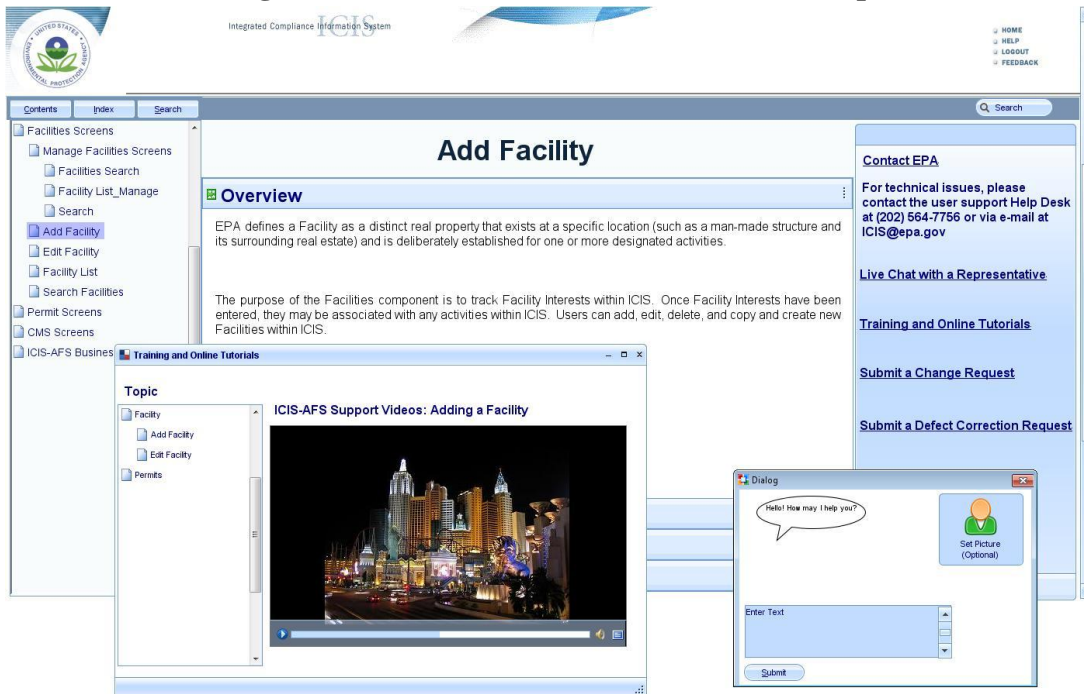
Figure 3.12-3. Notional Screen: Field Specific Enhanced Help

Figure 3.12-4. Notional Screen: Policy Document Management
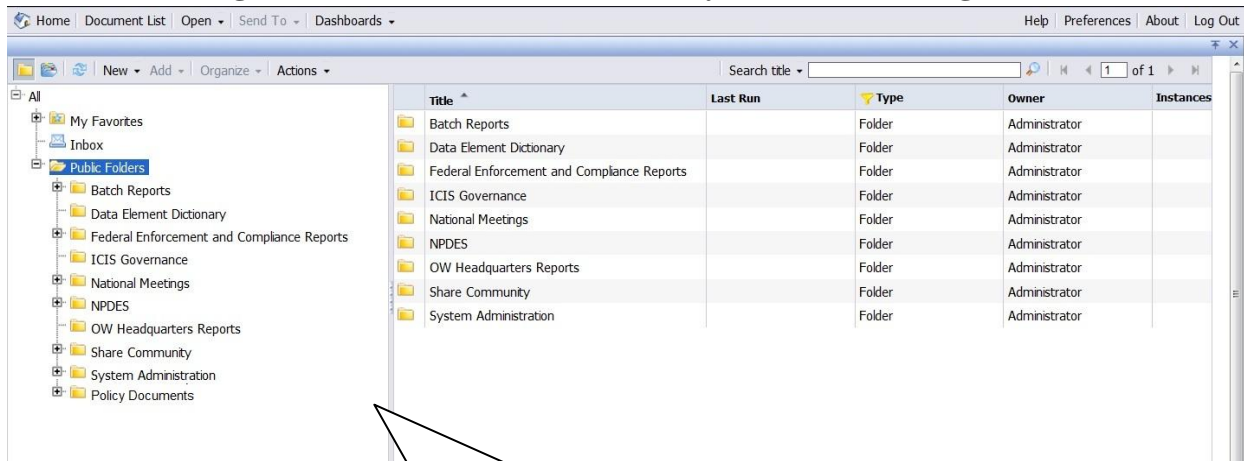
Policy information/documentation can be managed through the reporting too, which will also house the Data element Dictionary

4.0   APPENDIX A: LOGICAL DATA MODEL

4.1   PURPOSE

The purpose of this section is to display the Logical Data Model (LDM) for ICIS-Air. This section is intended for review by the entire AFS user community and other stakeholders and will provide the foundation for the detailed Entity Relationship Diagram containing the detailed physical database design for the modernized system. It captures the entities and relationships that support the Air business processes detailed in the requirements.

4.2   ASSUMPTIONS AND CONSTRAINTS

The following are assumptions and constraints that apply to the LDM:

- This LDM reflects the requirements of the Air community and AFS users without accounting for current ICIS database implementation
- During Detailed Design, this AFS LDM will be integrated with the existing ICIS database structure to form an integrated ICIS-Air physical data model; this data model will require changes to both the AFS LDM and the current ICIS data model.

4.2.1   General Data Organization

ICIS-Air will support the existing AFS data families and add some new ones. These data families are summarized in Table 1.2-1.

Table 4.2-1. ICIS-Air Data Families and Relationships

Data Family	Description
Facility	
Facilities	• A distinct real property entity operating at a physical location.
Pollutants	• Pollutants regulated by the Clean Air Act that are emitted by a Facility.
Programs	• The regulatory air program to which a Facility is subject. The regulatory air program authorizing and associated with an action taken by a local, state, tribal or Federal regulatory agency.
CMS	• A Compliance Monitoring Strategy (CMS) provides national consistency in developing stationary source air compliance monitoring programs while allowing delegated Agencies flexibility to address local air pollution and compliance problems. The CMS provides a framework for developing stationary source air compliance monitoring programs that focus on achieving measurable environmental results. A CMS outlines core activities for evaluation and recommended frequencies.
Permits	• A Permit is issued by permitting authorities to air pollution sources. A single air pollution source can have many permits. Similarly, a facility with multiple sources can have different permits assigned to each of the respective sources.
Wood Stoves Models and Certifications	• EPA regulates Wood Stoves particulate emissions, which contribute to significant air pollution, under 40 CFR Part 60, Subparts AAA, QQQQ, and RRRR. The certification process requires Wood Stove manufacturers to verify that each of the wood stove model lines meet a specific particulate emission limit by undergoing emission testing at an EPA accredited laboratory.
Incidents	• An Incident is an occurrence at the facility that may have an impact on operations or enforcement at that facility, such as a fire or bankruptcy.

Data Family	Description
Compliance Monitoring Activities	
FCEs/PCEs/ Investigations/ Information Requests	• A Full Compliance Evaluation (FCE) is a comprehensive evaluation conducted by a regulatory authority to ensure the Facility meets its compliance requirements. An FCE includes reviews of required reports and the underlying records; assessments of air pollution control devices and operating conditions; observing visible emissions; a review of facility records and operating logs; assessments of process parameters, such as feed rates, raw material compositions, and process rates; and stack tests if there is no other way to determine compliance with the emission limits. An FCE can only occur once per day. • A Partial Compliance Evaluation (PCE) focuses on a subset of regulated pollutants, regulatory requirements, and/or emission units at a Facility to ensure compliance. Multiple PCEs can occur on the same day to evaluate specific aspects of a Facility. • An Investigation is limited to a portion of a Facility, involving a more in-depth assessment of a particular issue. It usually is based on information discovered during an FCE, or as the result of a targeted industry, regulatory, or statutory initiative. • Information Requests, such as Section 114 letters, serve as a mean for Regulatory Agencies to request information such as records, data, or sampling from any person who owns or operates any emission source or who is subject to any requirement of the CAA. Purposes of Section 114 letters are to provide advance notification of an inspection, to obtain information when a full-scale, on-site evaluation is not cost effective, or to facilitate the effectiveness of an evaluation, and in some cases to eliminate the need for an evaluation.
Stack Tests	• Stack Tests are a type of compliance monitoring activity performed at facilities to ensure the facilities' compliance with regulatory requirements for emissions limits, or capture or control efficiencies. Delegated Agencies are required to conduct stack tests when there are no other means for determining compliance with the emission limits.
TV ACCs	• Title V Annual Compliance Certifications (TV ACCs) are a type of compliance monitoring activity performed by facilities with Title V permits to ensure the Facilities' compliance to regulatory requirements. Facilities are required to submit TV ACCs to the regulating Agency per the schedule outlined in the permit, usually once a year on an Agency-wide basis or on the anniversary of the permit.
CEM/EER	• Continuous Emissions Monitoring (CEM) is the continuous measurement of pollutants emitted into the atmosphere in exhaust gases from combustion or industrial processes to ensure that the required reductions of sulfur dioxide (SO_2) and mono-nitrogen oxides (NO_x) under the Acid Rain Program are met, as well as ensuring that emissions exceedences for carbon dioxide (CO_2) and non-criteria pollutants under NSPS, NESHAP, or other Air programs, are identified promptly so corrective measures can be taken at a Facility. • EPA requires that excess emissions be reported when a regulated air pollutant is released into the environment at a rate that is above the permitted levels for that Facility as outlined in the CEM. When an exceedance of emissions occurred for a pollutant, Facilities are required to submit Excess Emissions Reports (EERs) per report period, usually on a quarterly basis. If no emission exceedances occurred for a Continuous Emissions Monitor or Continuous Emissions Monitoring System (CEMS), the Facility would submit an EER summary report for that reporting period.
Alleged Violation Files	
Alleged Violation Files	• An Alleged Violation File (AVF) will connect all of the actions that identified or confirmed issues, such an odd Stack Test result, an Excess Emissions Report (EER) showing a very high or lengthy exceedence, a Partial Compliance Evaluation/Full Compliance Evaluation (PCE/FCE) finding; any actions taken to notify the facility, such as phone calls or Notices of Violation; and any addressing and resolving actions, such as Formal Enforcement Actions or closeout memos.
Enforcement Actions	
Informal Actions	• An Informal Administrative Action is generally any communication from EPA or Delegated Agency that notifies the regulated entity of a problem

Data Family	Description
Formal Actions	• A Formal Administrative Action by EPA or Delegated Agency may begin with notice of violation or with the issuance of an Administrative Order (either with or without penalties) to bring about compliance. These also include Judicial Actions, which are formal lawsuits, filed in court, against persons or entities that have failed to comply with statutory or regulatory requirements or with an Administrative Order.
Final Orders	• A Final Order is the document in which the Agency and respondent/defendant settle an Enforcement Action.

Figure 1.2-1 shows the relationship of these data families to each other. In general, a Facility has its own child records:

- Pollutants
- Programs
- CMS
- Permits
- Wood Stoves
- Incidents.

A Facility can have many activities ranging from Compliance Monitoring to Alleged Violation File and Enforcement Action activities. Activities can in turn be linked to each other to show pathways of activities and causal relationships.

Figure 4.2-1. Summary of Data Families and Relationships
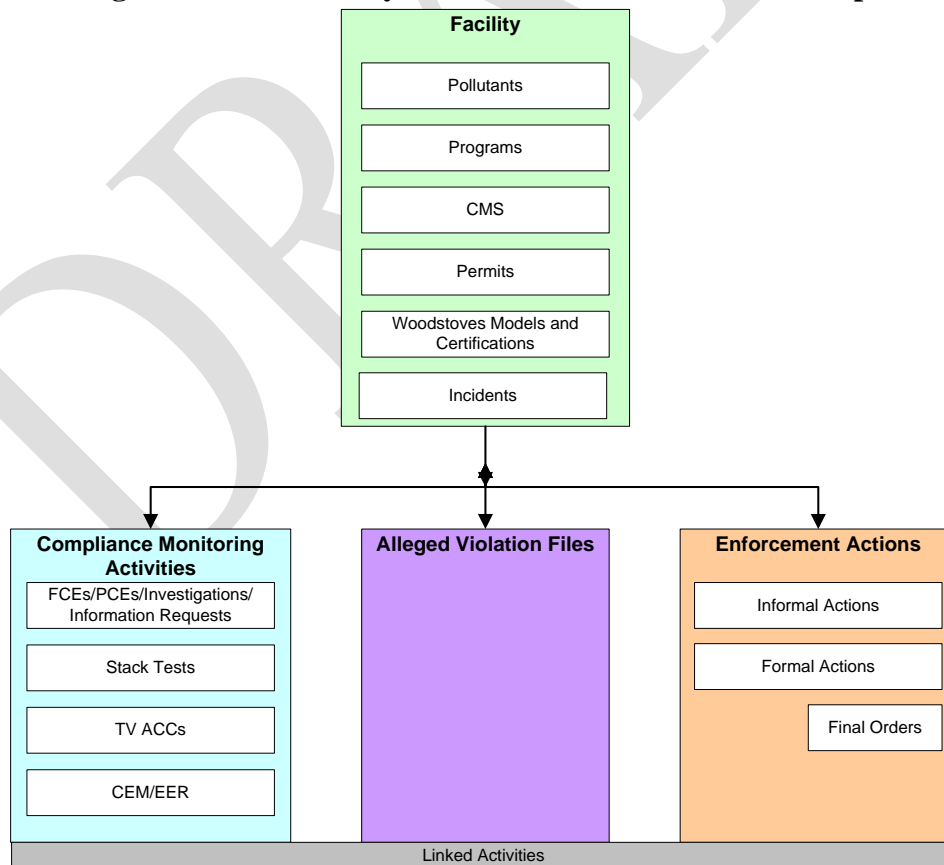
4.3   LOGICAL DATA MODEL

The following sections contain the Logical Data Model for ICIS-Air. They are organized by module/business area to assist the user in reading the model. Throughout the model, the main entities will be expanded to show all the attributes (aka data elements) and displayed in yellow. Reference tables and cross reference tables will be shown compressed with only main keys displayed. Individual modules will not show linkages between modules (with the exception of showing the Facility as the parent of an activity); the linkages can be seen in the Action Linking module (see Section 4.3.1.12).

All subject areas show a representative Audit table indicating that audit tables will be implemented to track updates and deletes of records in the main entity tables for an area.

The modules are:

- Facility (including programs and pollutants)
- Compliance Monitoring Strategy
- Permits
- Wood Stoves
- Incidents
- Compliance Monitoring – Full Compliance Evaluations, Partial Compliance Evaluations, Investigations, and Information Requests
- Compliance Monitoring – Stack Tests
- Compliance Monitoring – Title V Annual Compliance Certifications
- Compliance Monitoring – Continuous Emissions Monitoring/Excessive Emissions Reports
- Alleged Violation Files
- Enforcement Actions
- Action Linking
- System Administration and Security.

4.3.1.1 Facility

Figure 4.3-1 shows the ICIS-Air logical data model for Facilities.

Figure 4.3-1. Facility Logical Data Model
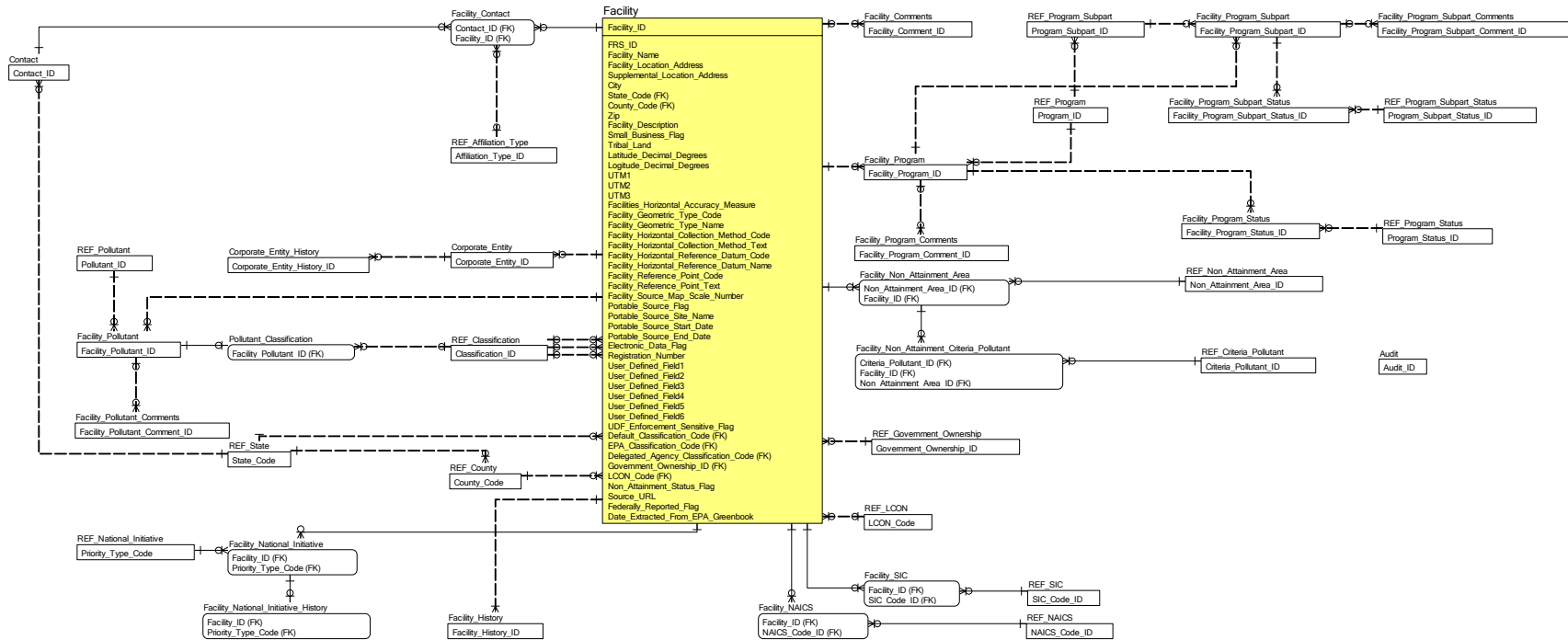
4.3.1.2   *Compliance Monitoring Strategy*

Figure 4.3-2 shows the ICIS-Air logical data model for CMS.

Figure 4.3-2. CMS Logical Data Model
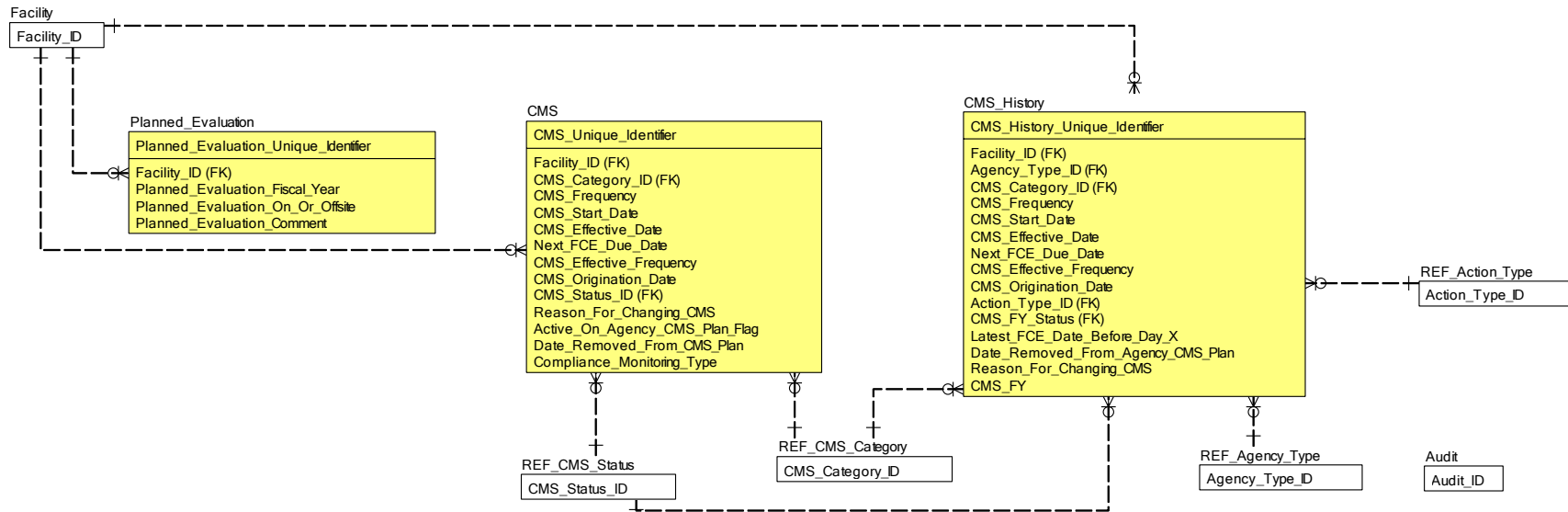
4.3.1.3   *Permits*

Figure 4.3-3 shows the ICIS-Air logical data model for Permits.

Figure 4.3-3. Permits Logical Data Model
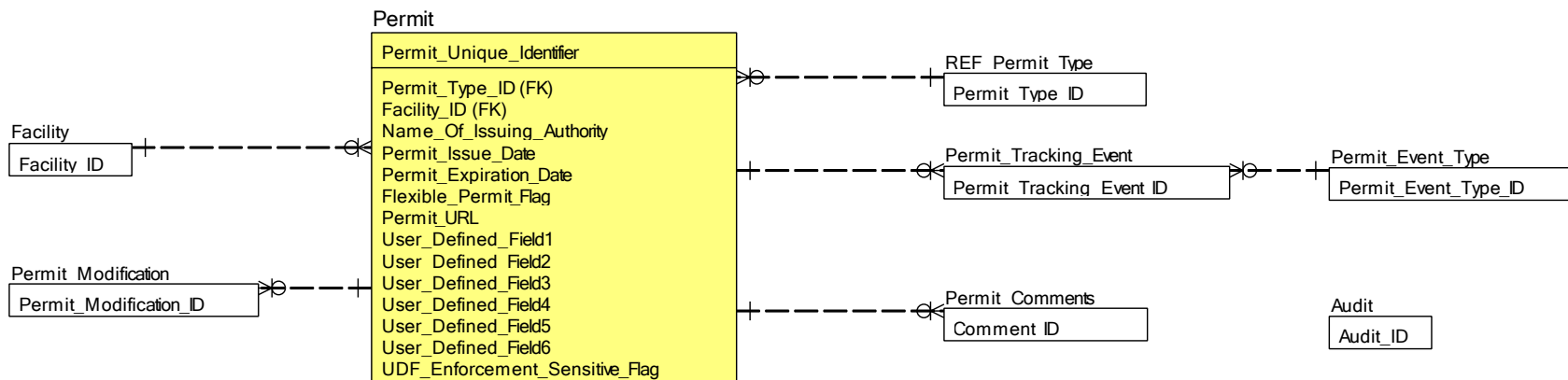
4.3.1.4   *Wood Stoves*

Figure 4.3-4 shows the ICIS-Air logical data model for Wood Stoves.

Figure 4.3-4. Wood Stoves Logical Data Model
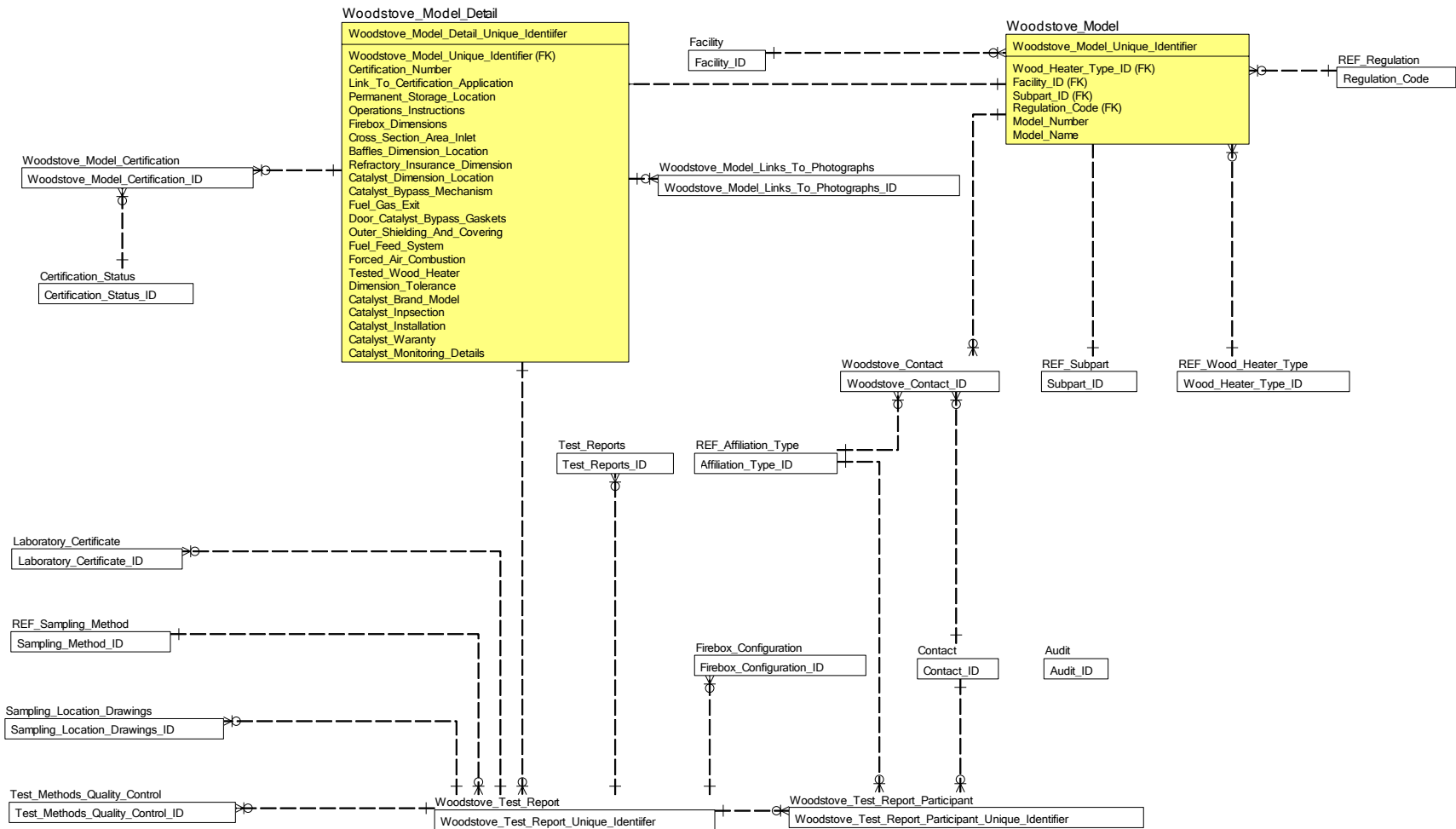
4.3.1.5 *Incidents*

Figure 4.3-5 shows the ICIS-Air logical data model for Incidents.

Figure 4.3-5. Incidents Logical Data Model
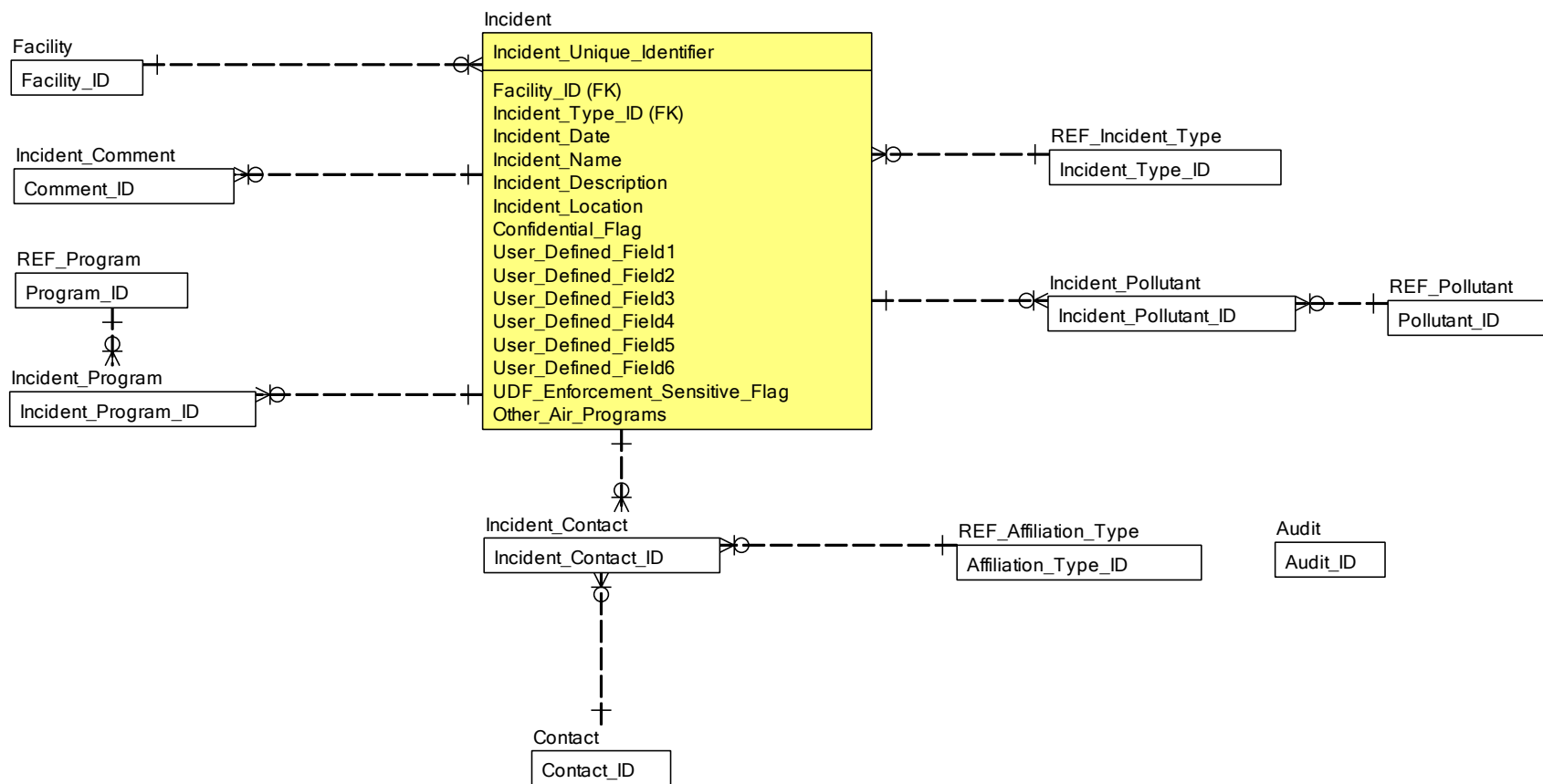
4.3.1.6 *Compliance Monitoring – Full Compliance Evaluations, Partial Compliance Evaluations, Investigations, and Information Requests*

Figure 4.3-6 shows the ICIS-Air logical data model for FCEs, PCEs, Investigations, and Information Requests.

Figure 4.3-6. FCEs, PCEs, Investigations, and Information Requests Logical Data Model
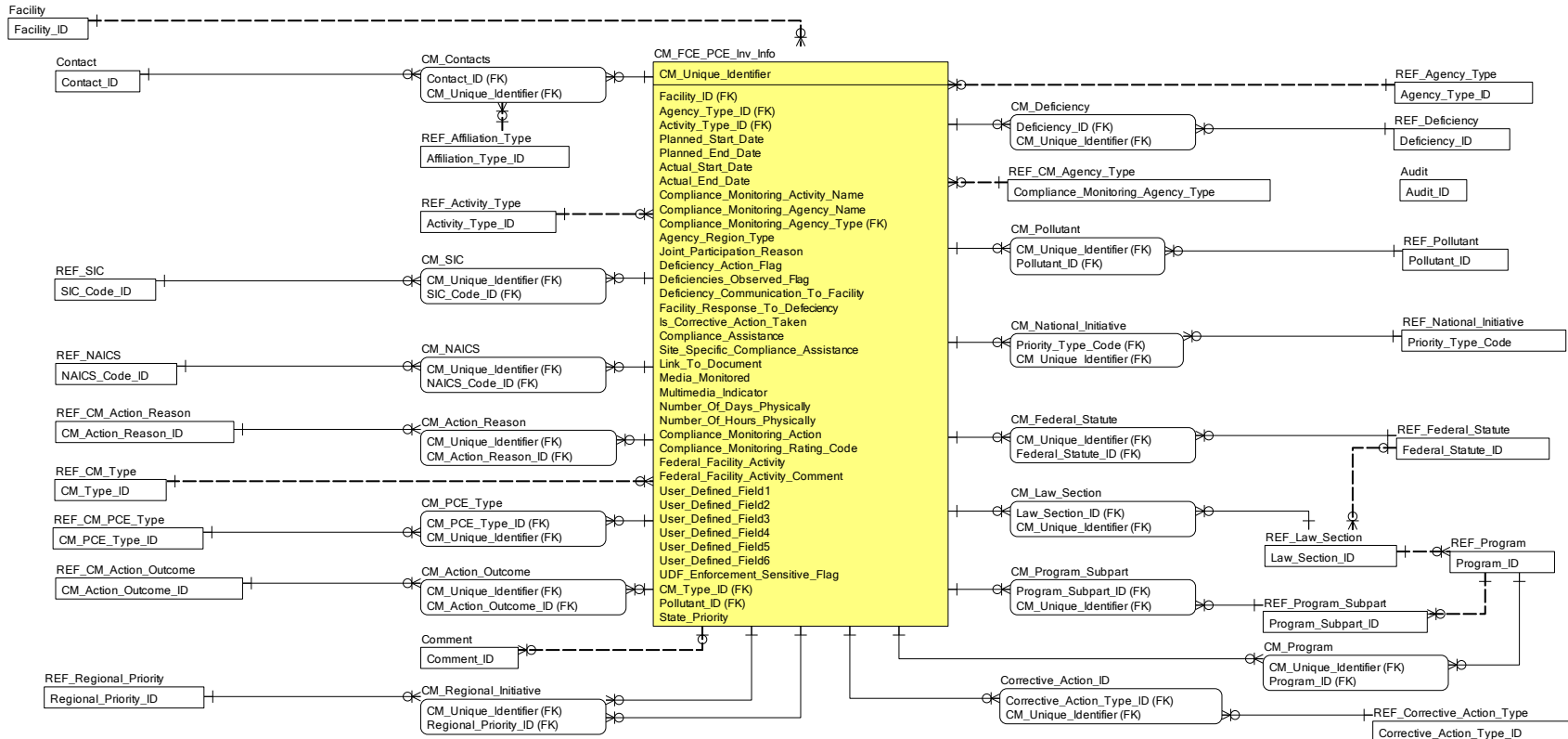
4.3.1.7   *Compliance Monitoring – Stack Tests*

Figure 4.3-7 shows the ICIS-Air logical data model for Stack Tests.

Figure 4.3-7. Stack Tests Logical Data Model
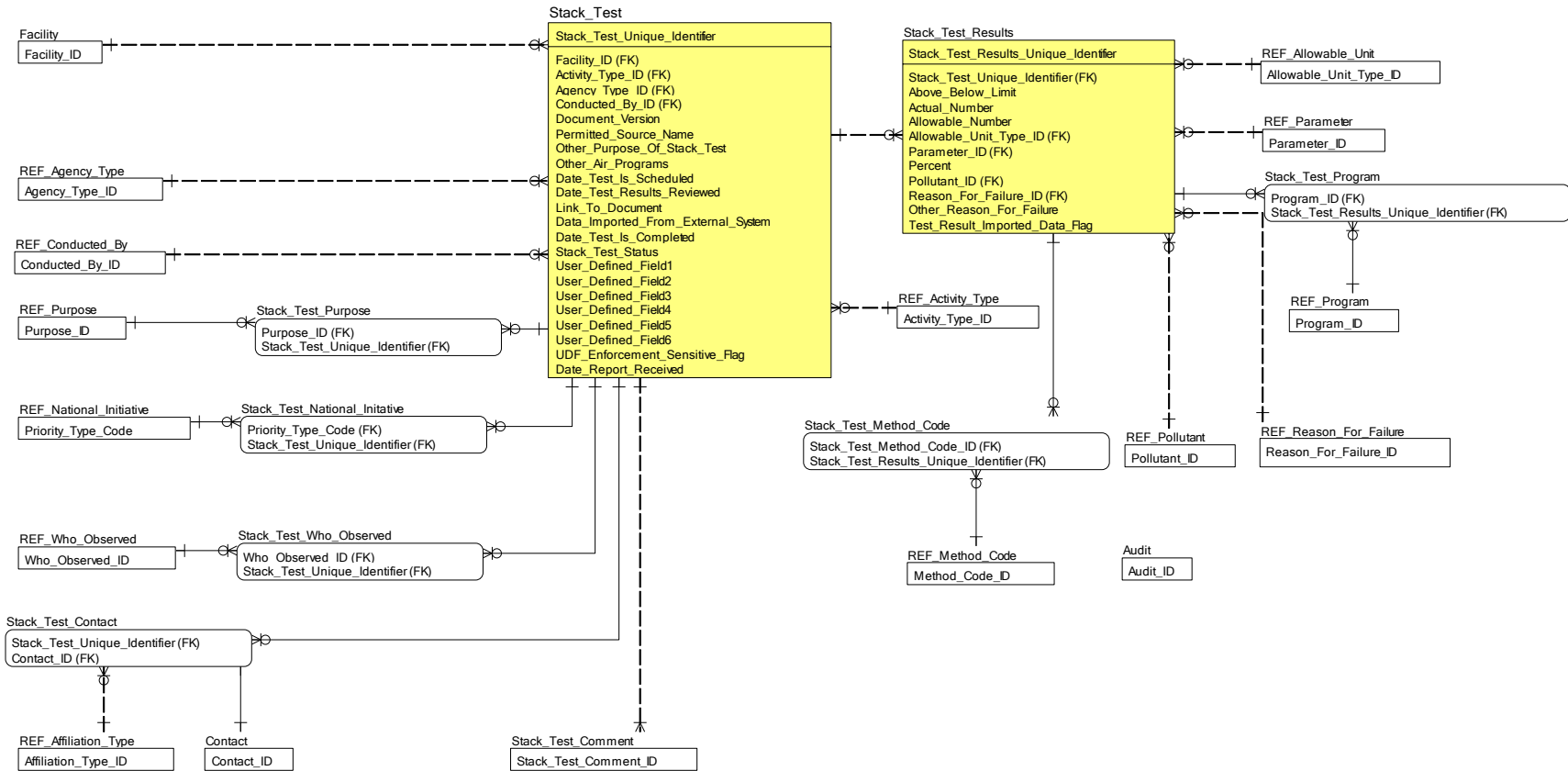
4.3.1.8 *Compliance Monitoring – Title V Annual Compliance Certifications*

Figure 4.3-8 shows the ICIS-Air logical data model for TV ACCs.

Figure 4.3-8. TV ACC Logical Data Model
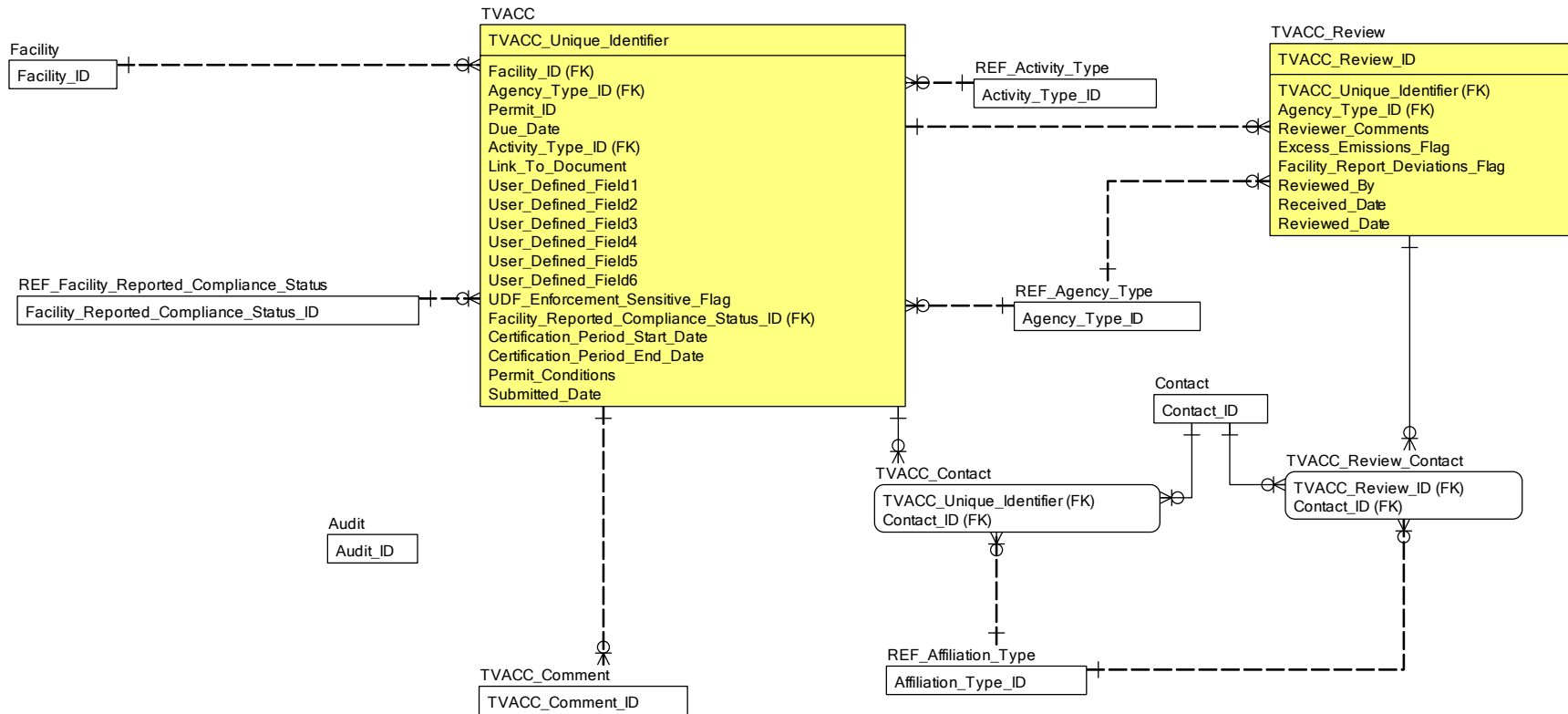
4.3.1.9   Compliance Monitoring – Continuous Emissions Monitoring/Excessive Emissions Reports

Figure 4.3-9 shows the ICIS-Air logical data model for CEM/EER.

Figure 4.3-9. CEM/EER Logical Data Model
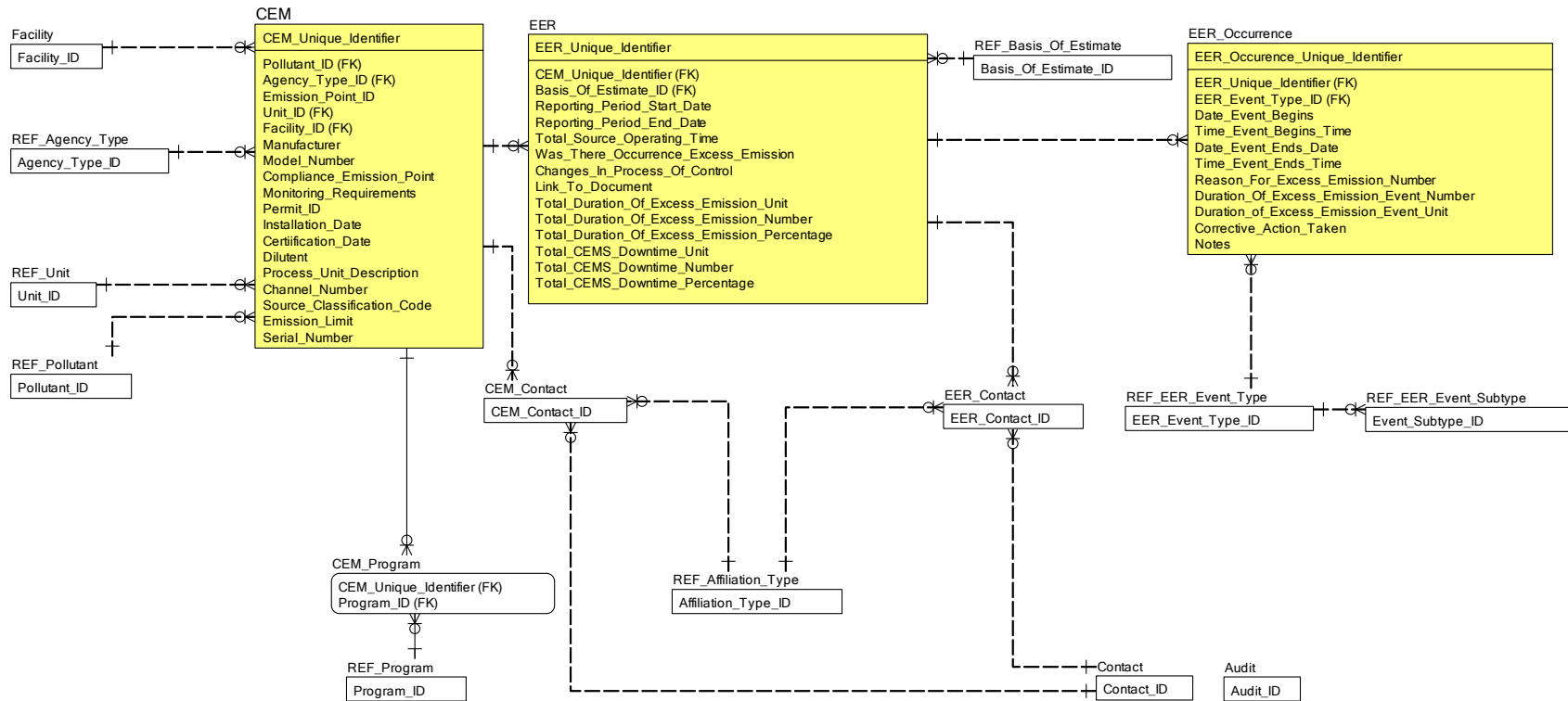
4.3.1.10   Alleged Violation Files

Figure 4.3-10 shows the ICIS-Air logical data model for AVFs.

Figure 4.3-10. AVF Logical Data Model
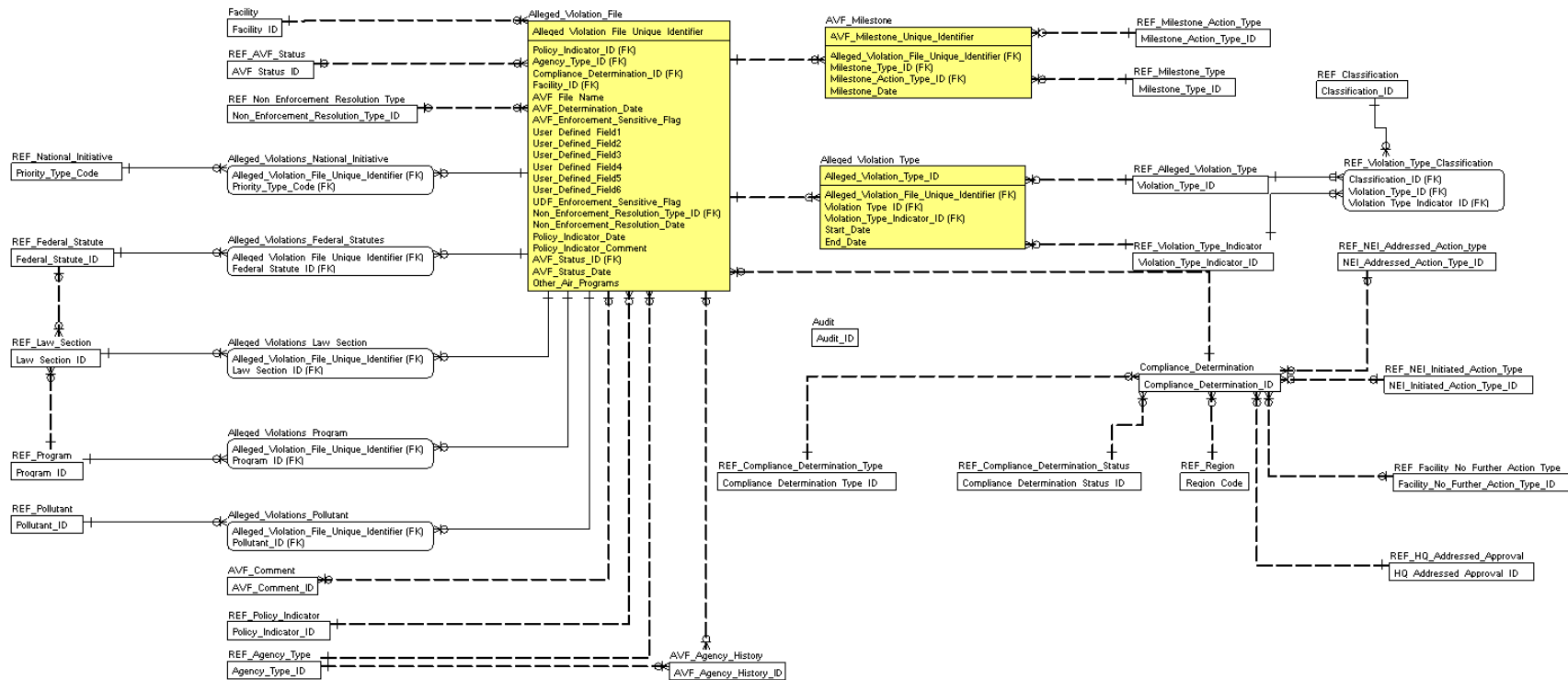
4.3.1.11   Enforcement Actions

Figure 4.3-11 shows the ICIS-Air logical data model for Enforcement Actions. Note that Formal and Informal Actions are shown separately to highlight their separate data needs; for the physical model these areas will likely be combined.

Figure 4.3-11. Enforcement Actions Logical Data Model
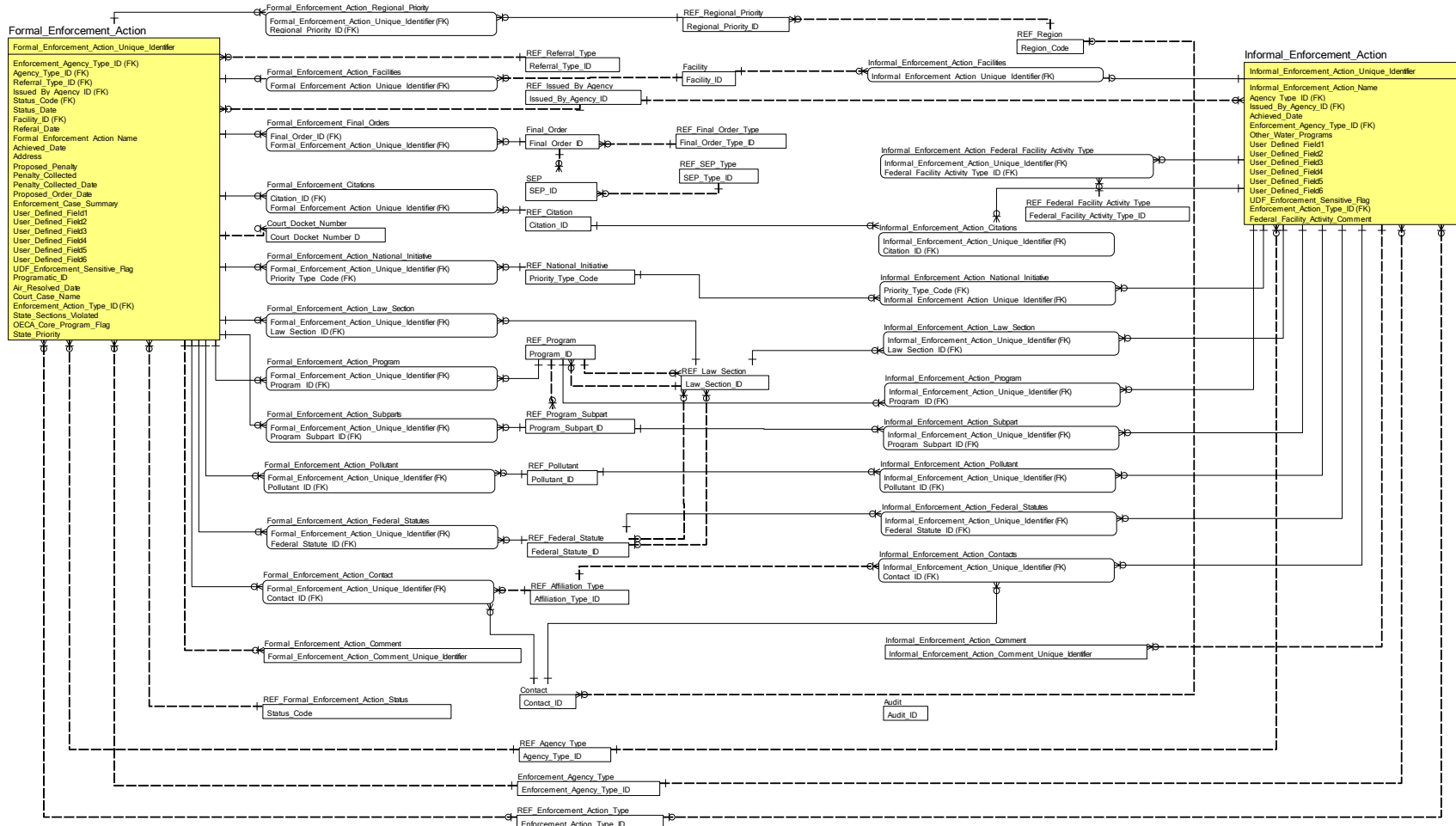
4.3.1.12 *Action Linking*

Figure 4.3-12 shows the ICIS-Air logical data model for Action Linking. Note that the related activity table joins twice to the parent activity table to link two activities.

Figure 4.3-12. Action Linking Logical Data Model
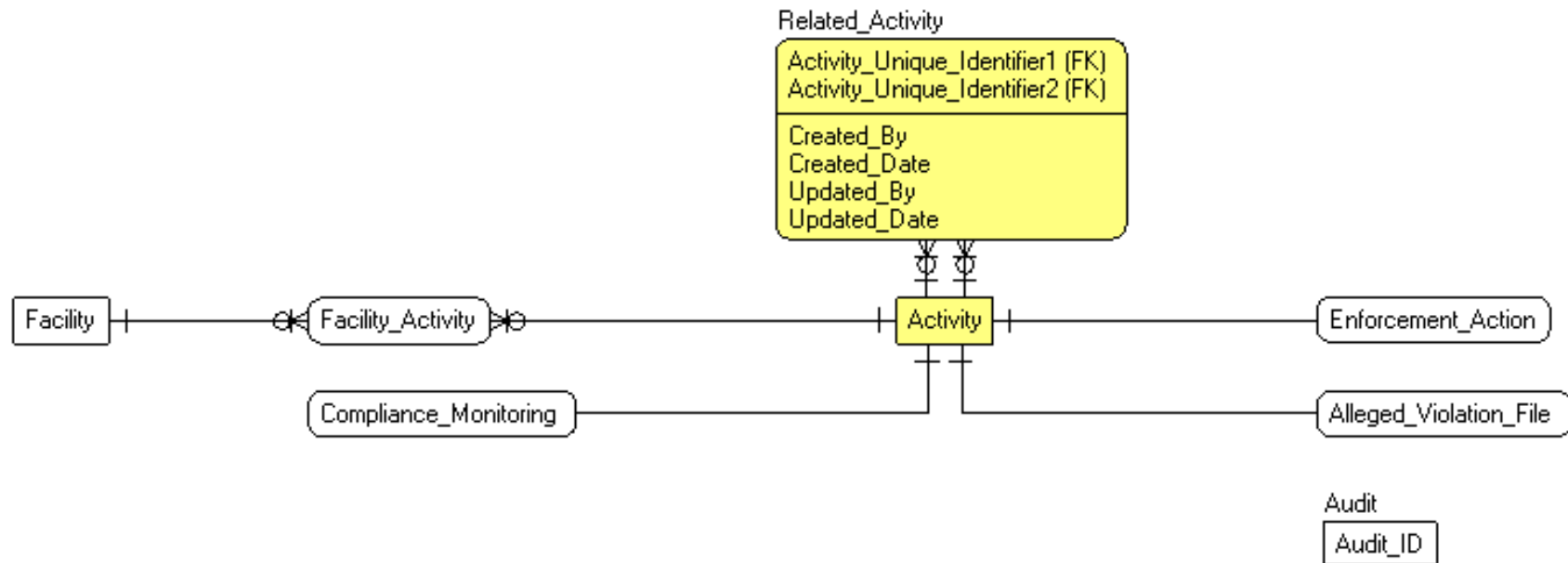
4.3.1.13 System Administration and Security

Figure 4.3-13 shows the ICIS-Air logical data model for System Administration and Security. Note that Change Requests and Log details must be worked out as part of physical design.

Figure 4.3-13. System Administration and Security Logical Data Model
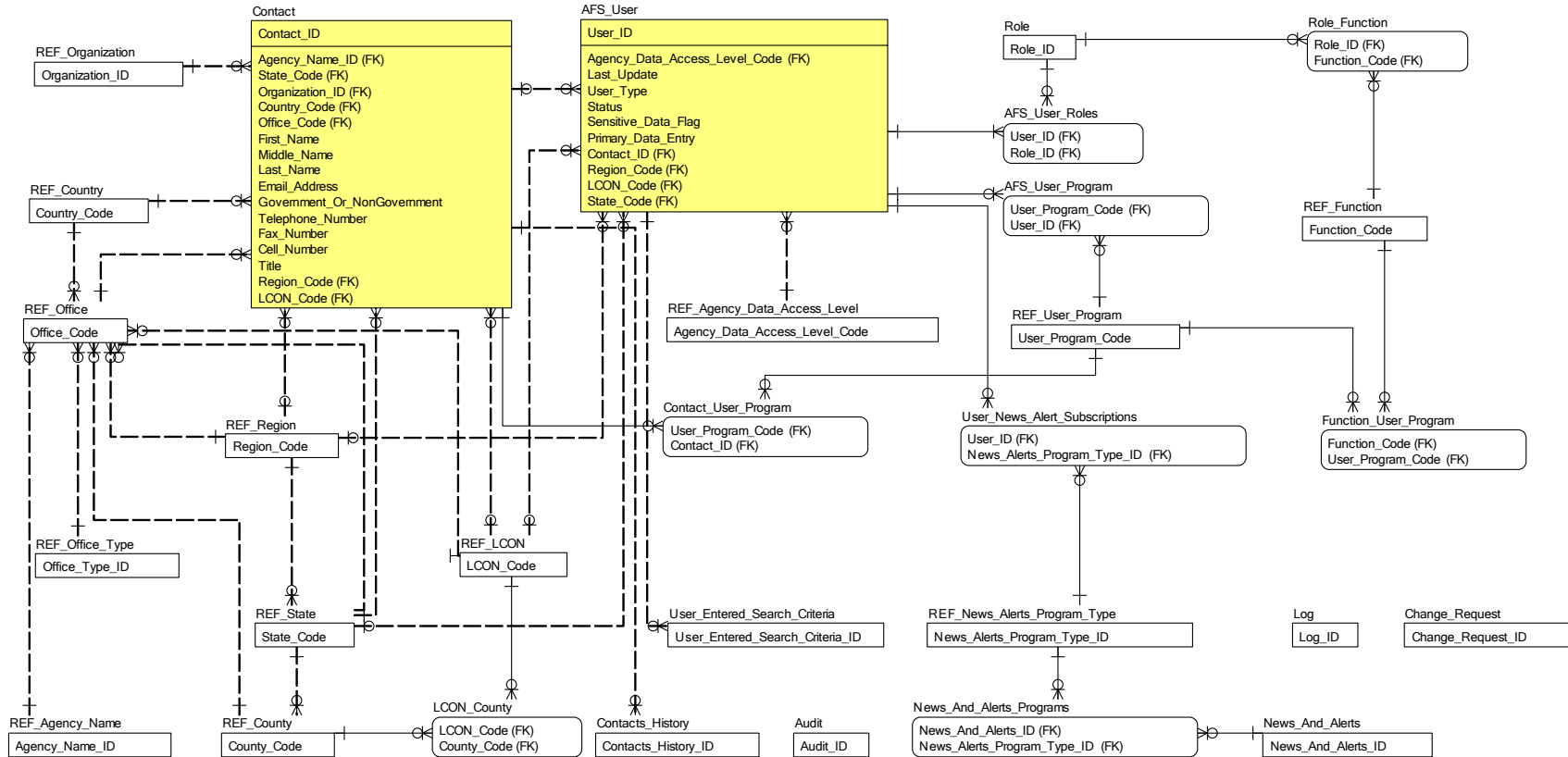
4.3.1.14   Legend
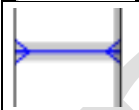
4.3.1.14.1 Color Coding

Table 4.3-1. LDM Color Coding Legend

Format Style	Meaning
Yellow	Core Tables of the functional area
White	Supporting Table

4.3.1.14.2 Cardinality

Table 4.3-2. LDM Cardinality Legend

Connection Style	Meaning
	One-To-One - An entity could be related to only one other entity
	One To Many – An entity is linked to many other entities, e.g. a parent table linked to many children
	Many-To-Many - An entity could be related to many other entities and vice versa

5.0   APPENDIX B: TIER 3 COMMENTS

This section contains the comments received from Tier 3 review of draft module documents. If a module is not listed here, it means that no formal comments were received for that module at the time of writing.

5.1   FACILITY

5.1.1   Facility

Module Being Reviewed	FACILITIES
Name	TIER 3 REVIEW
Date	2/24/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
1	OVERALL COMMENTS	Tier 3 review indicates that sample screens are unreadable and wasteful of space on the screen. Recommend bigger fonts and larger examples for future module reviews. Please ensure all definitions used are documented in the EPA's Terminology Serivce found at http://iaspub.epa.gov/sor_internet/registry/termreg/home/overview/home.do. The document references many different facility IDs, but the AFS ID does not seem to show up. The AFS ID is the first choice for all users in accessing data, the FRS ID second, and the State Registration Number third. Please standardize the nomenclature.	Betsy Metcalf	EPA, OECA, OC
2		If the Facility Record is displaying an EPA value and a state value and they are different, how would a user know which one to use/trust? The default value of classification needs to be provided reflecting the most stringent value of the two.	Betsy Metcalf	EPA, OECA, OC
3	Table 1.0-3	All screens should focus on the AFS ID number as key.	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
4	Table 1.0-3, 1-10	Fields Added: • Linkage to IDEA for National Emissions Inventory, TRI, and other media records (no separate login required)		
5	Table 1.0-4, 16	Addtion of LCON Description		
6	Table 1.0-4, 55	Attainment/Nonattainment Status • Pollutant • Description of Nonattainment Area • Date of Extraction from EPA's Green Book		
7	Table 1.0-4, NEW	Addition of Historic Start/Shutdown for Air Programs and Air Program Pollutants Tier 3 members pointed out that there are instances when a facility restarts a previously closed air program or subpart. The system needs to be able to reopen a record without losing history.		
8	Table 1.0-5, 1	This is the AFS ID and should be identified as such.		
9	Table 1.0-5, 30	This is a misinterpretation of the Business Rules, subparts when applicable are reportable, but just because the air program is present does mean subparts are.		
10	Table 1.0-5,25	This is only part of the rules for plants that relocate. If the COUNTY or STATE changes, then the ID number changes. If the address changes within the same county, then there is no change.		

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
11	Figure 1.0-1	An arrow is needed from Verify Uniqueness of Record if the data is not unique.		
12	Figure 1.0-3	Local Control Region and Tribal Indicator are missing. NAICS codes should always be first. There needs to be the ability to add multiples of air programs, subparts and pollutants. The Attainment information should be shown on this page. Where are the National Initiatives kept? All screen prints must be more readable.		
13	Figure 1.0-5	This table is too busy and not easily readable at a glance. Pollutants need to be listed in a table with history in another table.		
14	Figure 1.0-8	Please see comments for ADD FACILITY. This screen should show all entered values plus have access to HISTORY for air programs and subparts, National Initiatives, and other generated fields.		
15	Figure 1.0-10	History is too complicated to see at a glance. Edit should show all pollutants emitted in a table. History should be kept in a separate table. This screen needs to be reorganized.		
16	Figure 1.0-14	CAA ID, not CAA Permit ID. Please remove Permit Type. Delete SIC Code search from this screen. Add Federal Facility Indicator to Search.		
17	Figure 1.0-15	Not sure what the Actions mean on the List Facilities Screen. Search should present the CAA ID. This is not an AFS ID. Not sure what Associated Records means—NPDES? Electronic Records?		

5.1.2   CMS

Module Being Reviewed	COMPLIANCE MONITORING STRATEGY
Name	TIER 3 REVIEW
Date	2/24/2012
Organization	U.S. EPA/OECA/OC/ETDD
Summary of Changes: - 6/13/2012	Per the EPA Comments Adjudication meeting on May 8, 2012, the following changes were made: Updated Summary of Modernization in ICIS-AFS has been updated to reflect the changes as a result of Comments Adjudication on 5/8/2012. The Summary of Modernization in ICIS-AFS includes the existing and new CMS data elements with detailed description of each element. Also added new figures to show a high-level flow of how the CMS Status will be calculated CMS Categories have been updated and mapped to Facility Classifications Flow Diagrams have been updated to correct errors or based on global changes Notional screens have been updated based on comments from Tier 3 and Comments Adjudication meeting held on 5/8/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
1	Overall	Please prepare a graphic that defines the process used (with data elements identified) to generate the CMS Status. New fields are being introduced and it is not clear from the text how they will be used. Additionally, the nomenclature is confusing. We cannot agree to new data input fields and want the data for CMS to continue to be a streamlined as possible.	Betsy Metcalf	OC	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
2	Overall	During the Tier 3 Discussion on this topic, several regional staff and state/local members indicated that they wanted to see the process of tracking CMS records change from its current application in the legacy AFS to one which tracks evaluations using the duration of the frequency to track the start of the CMS periods, and not the date of the last evaluation. Currently, the last evaluation also triggers the "start" of the next CMS period. This concept was taken to the MAMP Division for a decision. MAMPD indicates that that current CMS process where the date of the last evaluation will be used as the start of the next CMS period will continue. Using the CMS frequencies as a definition for CMS periods could result in a facility receiving an evaluation during the first quarter of the CMS period, and then not again until the last quarter of the next CMS period. Depending upon the frequency, that could result in the span of 3.75-9.75 years which is unacceptable.	Betsy Metcalf	OC	2/24/2012
3	Overall	As we keep seeing, in this module & others, EPA's decision to rebuild AFs inside ICIS is overly complex, going to be far more costly than needed, & unnecessarily difficult. Just reviewing this module's small details & the implied new reporting/tracking fields & values continued to remind me that simply by being too much like the existing Water or FE&C ICIS-structures in concept, execution, or design it will prove to be NOHTING like the simpler AFS most regions, states, and locals who spent the past 2 decades participating expected nor like what they could imagine as the likely simpler final product . So I must once again say here for the record on behalf of myself & the states who will be struggling with the fine details of this ICIS-AFS complex monster, EPA should stop & rethink this now with LOTS more state/local input. AFS user community never told EPA to build modern AFS inside ICIS. They wanted sometime simpler. This module & the others is just a very costly & complicated way to do something that should be a whole lot simpler than it is proving to be in terms of detail, fields, relationships, & even screen to screen flow. While the CMs flags & coding are some of the simplest of any EPA could be seeking, even this with it's complicated flow chart logic & several new fields (even though some are planned to be auto populated) is just more than was cost effectively or prudently needed.	John Borton	R9	2/23/2012
4	Overall	Will there be any one screen where all the various statuses for the facility will be displayed? In order for us to determine what is due/not due at a facility it will be important to streamline and simplify the listing of all the various levels of status at a facility. Without this, if we have to navigate to any number of screens to make a status determination, it will waste a large amount of valuable FTE time.	Ken Mangelsdorf	South Coast, CA	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
5	1.0 Compliance Monitoring Strategy	Indicates that ICIS-AFS will generate the CMS Status based on frozen historical data for a fiscal year. The CMS Status should be generated on the CMS Start Date, Date of Last Evaluation, CMS Category and Frequency, and covers more than a fiscal year. This needs to be further explained.	Betsy Metcalf	OC	2/24/2012
6	1.0 Compliance Monitoring Strategy	The term "frozen historical data' appears here in this section & in others throughout the document. As is explained below in next section freezing or taking snapshots of data before the state/locals have legitimately had their full allocated chance to enter it, serves only to mislead & confuse everyone. So this entire document needs to be rethought & recalibrated to avoid freezing or calculating based on incomplete periods of data snapshots.	John Borton	R9	2/23/2012
7	1.0 Compliance Monitoring Strategy	Be reminded that for programming and status purposes, the normal frequency for a major source is 2 years from the last inspection date plus the time to the end of that second FFY.	Ken Mangelsdorf	South Coast, CA	2/23/2012
8	1.0.1 Summary of Compliance Monitoring Strategy Modernization in ICIS-AFS	Agree with generation of historical records.	Betsy Metcalf	OC	2/24/2012
9	1.0.1 Summary of Compliance Monitoring Strategy Modernization in ICIS-AFS	The October 1st date does not afford AFS users the allowed 60 days to enter their data, and there is no value in misrepresenting the CMS status for 60 days until the "official" record is created on December 1st.	Christy Monk	AL	2/23/2012
10	1.0.1 Summary of Compliance Monitoring Strategy Modernization in ICIS-AFS	During the call on this topic of CMS, we discussed nationally (several regions & some state/locals that capturing anything one day after the fiscal year end (eg Oct 1) was incorrect because state/locals have been allowed 60 days (eg until Dec 1) to enter their previous year's FCE, test, cert, CMS & other data. So none of the algorithms or date capture fields nor logic, should be using Sept 30 or Oct 1. In this section of the module, Frequency of CMS status mentions Oct 1 and running something one day after the end of the FY. I will make this comment here only once to be brief, but this problem has implications throughout the entire CMS module. Similarly for "historic CMS records" & 'snapshots' that sort of thing too by referencing Oct 1, is incorrect & thus will miscalculate. It impacts the CMS Effective Frequency as well possibly and	John Borton	R9	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
		thus proper calculation of the 'next FCE due date' as well - so the entire logic here is flawed & in need of major revision.			
11	1.0.1 Summary of Compliance Monitoring Strategy Modernization in ICIS-AFS	See 1 above. We have a real problem with 'freezing' the data. This data is dynamic and never static. "Freezing" the data may actually give a false impression of facility compliance status for the various programs. As we discussed, snapshots of the status for all facilities should not be taken until December 1. In Region 9 the state/locals do not enter CMS data. we enter actions that have a bearing on CMS status but not directly.	Ken Mangelsdorf	South Coast, CA	2/23/2012
12	Structure of New CMS Record	Do not agree that a user-entered field is necessary to indicate if a facility is active on an Agency CMS Plan. Date Removed from Agency CMS Plan: this should be an optional field. The new fields sound too confusing and it would be best to have another meeting to see how all of these fields interact with each other.	Betsy Metcalf	OC	2/24/2012
13	Structure of New CMS Record	CMS plan (active Y/N?) and date (date active/inactivated) appear to be mandatory in how the logic will need to use them. This strongly suggests each state/local (as well as each region) would need "sensitive access" so as to be able to adjust these in a timely manner as needed. The formula for the "Next FCE due date" here & elsewhere in this document appears to be questionable, as there are possible ways in which the CMS effective date (as discussed on the national call on this document) MIGHT trigger a due date either at the end of the current cycle, or in middle potentially of the next cycle. Booz Allen should ensure that this logic will always allow for a full 2 yr, 3 yr, 5 yr cycle, such that the due date calculated is ALWAYS at the end of the cycle that it should be, this one or the next one as is most appropriate. So, please spend time confirming the logic does NOT confuse or shorten this fact, by accidently keying off of the date of last FCE+this timing, but instead should be allowing (even if the FCE at a 2 yr source were done on the very first day of the current 2 yr cycle and the next on the very last day of the next 2 yr cycle, that remote possibility isn't excluded or shortened inadvertently by some quirk of logic. This also applies for concurrent 3 yr or 5 yr cycles, no one should be penalized for doing an FCE on first day of the first cycle & then last day (& entered 60 days later) of the later cycle period). This is a longstanding fundamental concept of FCE & CMS targeting measurement that is easy to overlook or get wrong when logic becomes overly complicated. ALSO, it appears there may be a missing date/element in this section that should be added, as it is required/mentioned elsewhere in this CMS document as part of a calculation. It appears CMS Frequency as a number is captured, but this document has missed the need for a CMS Frequency Year (YYYY) end. It appears the internal logic intends to roughly calculate this, internally, but perhaps actually STORING a CMS FREQUENCY END YEAR (and/or CMS FREQUENCY END DATE, from which an end year	John Borton	R9	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
		could be extracted is lacking at this time & needed.			
14	Structure of New CMS Record	The terms "CMS Origination Date", "CMS Start Date", and "CMS Effective Date" need to be clarified. ----- The "Next FCE Due Date" needs to be clarified. There isn't much more to discuss until these terms are clarified.	Chris Cote	Ventura Co, CA	2/23/2012
15	Structure of New CMS Record	We do not have any familiarity with the structure of the CMS record since we do not enter data into CMS.	Ken Mangelsdorf	South Coast, CA	2/23/2012
16	Table 1.0-1 ICIS-AFS CMS Functional Requirements	2-6: Unsure on how all of these fields are used. 2-10: Need some way of keeping track of references that are in modules that we haven't reviewed yet (Security). 2-11: This requirement includes Enforcement Sensitive data. Planned evaluations are Enforcement Sensitive and should be removed for display to users without Enforcement Sensitive Access. 2-16-17: Planned evaluations can only be entered by users with Enforcement Sensitive access.	Betsy Metcalf	OC	2/24/2012
17	Table 1.0-1 ICIS-AFS CMS Functional Requirements	Item 2-6 & 2-10 specify a "Planned Fiscal Year", which is clearly NOT the same as the CMS FREQUENCY YEAR END mentioned above in item 5 and thus the PLANNED YEAR should NOT be confused with the FREQUENCY YEAR throughout the document. ADDITIONALLY, 2-161-3 & 2-17 specify that for the PLANNED year multiples are allowable and on-site/off-site flags are expected, this part MUST continue to be OPTIONAL, because many state/locals told EPA repeatedly they could say a facility would be targeted in a 2 yr or other cyclic window, but were not able to commit to any kind of ANNUAL targeting more specific than that (or if the visit would be on-site vs. off-site at this time). So just a reminder that in the various places in this CMS document where it has flow charts & asks for a PLANNED FY & PLANNED on/off flag, those flags should be optional, and thus other important snapshots or calculated data should not be triggered or using these flags as other flags like Frequency, Frequency Yr, or last FCE are far more appropriate mandatory fields & thus are preferable for calculations.	John Borton	R9	2/23/2012
18	Table 1.0-1 ICIS-AFS CMS Functional Requirements	Still not clear on the difference between CMS Origination Date, CMS Start Date, CMS Frequency, CMS Effective Date and CMS Effective Frequency. To my knowledge, we do not plan the date in advance when a an evaluation will occur. Only the year in which it will occur.	Ken Mangelsdorf	South Coast, CA	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
19	1.0.3 CMS Data Requirements	#10. "Next FCE Due Date" For the last 5+ years the FCE due dates for Title V facilities have been due within a 2 year block. Several years ago there was a big discussion about calculating the next FCE date by adding 2 years to the previous FCE date. The problem was that agencies that completed FCE's early could be penalized if they took longer than 2 years to complete the next FCE. One option to deal with penalty of reporting early is to report all FCE's in Sept. The CMS policy states that all actions for an FCE should be completed within a federal fiscal year, so reporting all FCE's in Sept. complies with the CMS. The problem with reporting FCE's in Sept. is that EPA wants the FCE's reported early in the year.	Chris Cote	Ventura Co, CA	2/23/2012
20	1.0.3 CMS Data Requirements	We do highly recommend that the AFS Plant ID be the primary identifier for the plant/facility.	Ken Mangelsdorf	South Coast, CA	2/23/2012
21	Table 1.0-3 ICIS-AFS CMS Business Rule Requirements	Ensure CMS categories are corrected in 2-23.	Betsy Metcalf	OC	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
22	Table 1.0-3 ICIS-AFS CMS Business Rule Requirements	Item 28 mentions the CMS FREQUENCY YEAR issue I raised earlier, and then also seems to convey a false logic that the calculation in this item will increment up to the end of the last day of "that fiscal year" when I believe it should say "the end of the next FY cycle" as I discussed in item 5 above of my comments. This is crucial to ensuring as we discussed on the phone, that an FCE in one CMS cycle, will then stay credited (& never generate a faulty 'overdue') by allowing/resetting once one CMS cycle has been completed with one FCE, that the end of the next CMS cycle becomes the calculated next DUE DATE. So much of this logic is more complex with the various planned ICIS-generated interim dates & snapshots, that I am mentioning this here to ensure we don't accidently shorten the option to do an FCE in the end of the NEXT FULL CMS allowable cycle, regardless of the 2 yr, 3yr, 5 yr amount, so as not to shortchange the state/locals in the time allowed to do their next FCE & still meet intent of CMS as it is currently written & as recently revised. SECOND COMMENT is that item 29 postulates a "default CMS Frequency" as something different from the "Actual CMS Frequency". This is confusing & might mess up some calculations if one were substituted in error for another, so please use caution again here to NOT shorten the next CMS cycle or calculated end date inadvertently (Such as in item 30, 33, or 34 as possible examples). THIRD COMMENT is the logic of item 35 MAY cause unintended problems for any agency who can't update the PLANNED CMS Yr fields every year (something many state/locals told us long ago was NOT something they collected locally or could always do manually, even thought EPA hoped this would happen someday. So since ANNUAL CMS flag updating may still have to be an optional thing for some, we need to be sure the internal logic, doesn't force this into the realm of mandatory, before agencies are ready to do so (if ever). FOURTH comment is that items 34 & 35 allow for only 1 planned evaluation (FCE) per FY, but SOME agencies may wish or do multiple FCE per year planning/tracking. So while this is consistent with current logic in AFS in the optional fields for this, it seems off to limit state/locals who could or do do more frequent targeting or FCEs than EPA specifies, to ONLY the minimum EPA amount. So this is yet another reason these fields perhaps ought to be both maintained as OPTIONAL and rethought for how EPA might credit/allow frequencies more frequent than our own, instead of mandating a kind of double bookkeeping (EPA think) on these targets by the states/locals who perhaps COULD or do do more than our minimums. This is precisely the kind of element/flag that fails to recognize or credit agencies who do MORE than the federal limits routinely and perhaps forces double bookkeeping, since our systems don't accommodate their alternate cycles or uses.	John Borton	R9	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
23	Table 1.0-3 ICIS-AFS CMS Business Rule Requirements	This section is very unclear, What are CMS Categories A, E, P, M, G, D S, N, F, B, O, X, and Z?	Ken Mangelsdorf	South Coast, CA	2/23/2012
24	1.0.5 Add CMS	The system should also generate the CMS Start Date. It should be clear that a facility DOES NOT HAVE TO HAVE a CMS record. If the facility is major, it should have a CMS category assigned. A facility with a classification of SM or lower DOES NOT HAVE TO HAVE a CMS record. This section implies that a CMS record is required for each facility.	Betsy Metcalf	OC	2/24/2012
25	1.0.5 Add CMS	CMS Frequency is marked here as a required data element, & then it says only users with "enforcement sensitive" role can change this value. While R9 has traditionally done all the CMS targeting for our users, it would make sense to us that due to our shrinking resources in R9 for such oversight & online work, our state/locals would NEED to also have this right, even if few choose to use it often. So this would suggest to me that ALL state/local users in R9 would need to be given "Enforcement Sensitive" access simply for this field alone. NOW, my comment is that SINCE CMS flagging has little or nothing to do with other kinds of Enforcement sensitivity, perhaps there ought to be a range of several AFS user profile flags that are more specific to what is being granted or needed. I would recommend instead of just a sole "enforcement sensitive" user Flag with LOTS of rights & access, you could make useful & sensible user access limits such as" 1) Facility, 2) Permits, 3) CMS Flags, 4) Compliance data, 5) Enforcement data. or 6) other data (as a place holder for anything else later needed to be specified).	John Borton	R9	2/23/2012
26	Figure 1.0-11 Generate CMS Record Data	A new CMS record with CMS Category upgraded to major should generate a new CMS Start Date.	Betsy Metcalf	OC	2/24/2012
27	Figure 1.0-1 Use Case: Add CMS-Batch	Not a Batch User	Ken Mangelsdorf	South Coast, CA	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
28	Figure 1.0-2 Use Case: Add CMS-Web	Have seen error messages during previous ICIS demonstrations. Will the error messages in the new ICIS/AIRS system be less cryptic? Rather that just letting us know there is an error, can the error messages identify where the error has occurred?	Ken Mangelsdorf	South Coast, CA	2/23/2012
29	Figure 1.0-3 Screen: Add CMS	Not sure why a user must indicate that a facility is active on an Agency CMS Plan.	Betsy Metcalf	OC	2/24/2012
30	Figure 1.0-3 Screen: Add CMS	Again, on all the screen shots, they are illegible, even when blown up, they are even more illegible. Hopefully the fonts will be larger and the screens laid out more logically.	Ken Mangelsdorf	South Coast, CA	2/23/2012
31	Note: No 1.0.6	Note: No 1.0.6	Betsy Metcalf	OC	2/24/2012
32	1.0.7	System should generate CMS Start Date. Why should users be able to alter the Next FCE Due Date? This should be eliminated to avoid problems with generation of status. Users without enforcement sensitive access should not have access to the CMS records. They should be able to extract CMS Category and Date of Last FCE and that is all.	Betsy Metcalf	OC	2/24/2012
33	Table 1.0-4 CMS Start Date Change	Ensure Table 1.0-4 is updated for accuracy of CMS Categories.	Betsy Metcalf	OC	2/24/2012
34	Table 1.0-4 CMS Start Date Change	This section is very unclear, What are CMS Categories A, E, P, M, G, D S, N, F, B, O, X, and Z?	Ken Mangelsdorf	South Coast, CA	2/23/2012
35	Figure 1.0-4 Use Case: Edit Compliance Monitoring Strategy-Batch	Question, this item mentions in the text that ANY system-required or Business Rules data elements that are missing or invalid will cause the batch to reject. Does this mean every line of the Business Rules is considered to be a 'required' element/field/definition even if it says there it's optional or doesn't say it's mandatory? I would guess not, but might be helpful to clarify that fact. For example, this relates to the date format in old (existing) AFS batch YYMMDD, vs. newer style we most likely someday will wish to allow in batch MMDDYYYY or others.....Are we only planning for batch to be the OLD EXISTING AFS batch cards, or will ICIS-AFS also someday plan to support its own formats as well? That is not clearly indicated here & I would hope we would not limit batch users to the old AFS cards & formats, since so many new fields, values, & other information is being sought on the ICIS-AFS screens themselves. So this seems to be a planning oversight or gap here. Yes we need old AFS batch supported, but what kind of modern batch are we planning for as well?	John Borton	R9	2/23/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
36	Figure 1.0-4 Use Case: Edit Compliance Monitoring Strategy-Batch	Not a Batch User	Ken Mangelsdorf	South Coast, CA	2/23/2012
37	Figure 1.0-5 Use Case: Edit CMS-Web	Users without Enforcement Sensitive access should not be able to access CMS records.	Betsy Metcalf	OC	2/24/2012
38	Figure 1.0-10 Use Case: Delete CMS-Web	Why does the system need to ascertain if the facility has a CMS Status? Not certain why this functionality is there.	Betsy Metcalf	OC	2/24/2012
39	Figure 1.0-11 Generate CMS Record Data	New CMS Start Date should be generated. New CMS Start Date return does not seem logical. Shouldn't it go it CNS Effective Date = CMS Start Date?	Betsy Metcalf	OC	2/24/2012
40	1.0.11 Background Processing-Generate CMS Status	So basically, if the Latest FCE Date exists and the CMS Start Date is greater than the Latest FCE Date, then the CMS Effective Date equals the CMS Start Date?	Betsy Metcalf	OC	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
41	1.0.11.1 Generate CMS Status on Current CMS Data (1.0.9.1 in my document)	The October 1st date does not afford AFS users the allowed 60 days to enter their data, and there is no value in misrepresenting the CMS status for 60 days until the "official" record is created on December 1st.	Christy Monk	AL	2/23/2012
42		Note most of the CMS flow charts & calculations about various due dates/end dates etc were so complicated by new fields or new concepts seemingly unique to ICIS itself or ICIS-AFS as the Booz Allen contractors envision it, that it was not possible for me to QA every chart & calculation for accuracy of result, hence my earlier comments about what to avoid or to be sure NOT to do. So with the short review timeframe available to us, this note is just a place holder for any of those items where my earlier comments did differ from what OECA and/or the Booz contractor is planning & my main point is to once again caution NOT to shortchange any agency where an FCE was done in one CMS cycle & then should never have the next DUE or overdue sooner than the very end of the next cycle (with allowances even for the 60 day EOY time lag on entry we have so long allowed & some rely upon). Thank you.	John Borton	R9	2/23/2012
43	Table 1.0.-2 ICIS-AFS CMS Data Requirements	3: Please correct the CMS categories to match with legacy AFS, as the BRC contained errors. This field should be marked as required. 4: Should be optional. 5. Should be marked as required. 8. Should be system generated. This is too confusing for users to be providing and the system should figure this out. 12. Do not agree that this should be added. 13. Should be marked as optional. 14-16: Should be marked as optional.	Betsy Metcalf	OC	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
44	Table 1.0.-2 ICIS-AFS CMS Data Requirements	This table ID item #3 includes many new EPA & tribal flags for CMS beyond the traditional A, M, S, or O state/locals have long used & expected to see. While the purpose for these new flags is well-intentioned, it's important to note here that Regions will need to update/populate their EPA-only items, and Tribes to populate the Tribal-only items, but also that there MAY be some facilities where only SOME PARTS of the facility (such as where PSD NSR perhaps hasn't yet been delegated, but the rest has) so JOINT valid values seem to be lacking from this coding chart & perhaps OUGHT to be considered. ALSO I do not see a regional ownership code here that MIGHT help in cross-regional retrievals and statistics (such as our Navajo land sources where SOME facilities fall in R9 & Navajo jurisdiction functionally, but are in R6 (NM) or R8 (UT) physically and in current AFS unable to be manually updated by Navajo or R9 staff directly, nor do they easily show up on routine reports & counts. So it seems as if adding a REGIONAL GROUPING field here (eg this source falls within R9 or the Navajo (st+L:con groupings) might be helpful.; THIRDLY, in the space between items 5 & 6 (CMS Frequency & CMS EFFECTIVE FREQUENCY) it seems THIS might be the place where the missing field (CMS Frequency YEAR) might need to be added in, since both here are defined as integers (eg numbers) and NOT FY date-like items. FOURTHLY, on item 8, while we need to preserve for existing Batch users, an old-style acceptance of AFS batch cards with dates in YYMMDD archaic format, don't we also need to be planning for batches in a NEWER batch format that could see them as MMDDYYYY? It is clear the Web screens are going to accept that, but shouldn't we be planning 2 styles of batch acceptable inputs (old AFS as it exists) and a better newer ICIS-AFS batch, with more modern date style accepted?	John Borton	R9	2/23/2012
45	Table 1.0.-2 ICIS-AFS CMS Data Requirements	There appear to be several new data entry fields. Will these be required?	Ken Mangelsdorf	South Coast, CA	2/23/2012

5.1.3   Permit

Module Being Reviewed	PERMITS
Name	TIER 3 REVIEW
Date	2/24/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
1	Overall	The proposal provided by BAH was completely different than the SRS. The SRS did not follow the way legacy AFS organizes or uses Title V data. Legacy AFS uses a permit module that was developed in the late 90s that failed with state and local users and was basically abandoned by the Office of Air and Radiation. Some agencies continue to report permit data as their regions use it and request it. Therefore, Legacy AFS still maintains the data. It is not currently used at the HQ level and we would not want to continue using these fields as they are programmed. Additionally the data structure proposed by BAH is too complex, is too dependent upon NPDES requirements, and adds more functionality that is needed by the business rules. Suggest rewrite to match more of what was requested in the SRS.	Betsy Metcalf	OC	2/24/2011
2	Overall	The SRS indicated the need for tracking five years of Annual Compliance Certifications, but this module does not seem to include it.	Betsy Metcalf	OC	2/24/2011
3	Overall	Use Cases need to include a block of Key Data Elements necessary to establish the record	Betsy Metcalf	OC	2/24/2012
4	Overall	PLEASE NOTE that in EPA R9 itself AND in many or most of our state/local agencies, the traditional AFS user community & their management are Enforcement folks, and NOT the same as, nor even often with access to or knowledge of the actual PERMIT data details & dates etc. Long ago when Title V program first came into being, & EPA (OECA) had proposed about 400 desired data elements for permits and reached out to both regional & state/local agencies, these sorts of issues were discussed on national & other calls at length and eventually the 400 sought data elements were reduced to 12 permit PPDEs. Even then collecting those was incomplete or dicy and at least in our region, Linda, on behalf of the region spent vast amounts of time seeking to gather, enter, & QA that data for the then existing AFS source universe. With Linda's retirement & my subsequent move to a new section (no longer reporting to Air & no longer working for Doug), it is highly unlikely that there will be time, FTE, or resources to cover this item well at the regional level, since our Permit office, loudly & clearly told both OAR &	John Borton	R9	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
		OECA that it did not use or support AFS and would NOT be loading any information into AFS on the behalf of OECA, because it simply did not have resources or see a benefit locally. This issue remains identical at both the region's level and also in so many state/local agencies we oversee that the state/local permit staff & their internal databases too (not being even integrated between such sections as permits to compliance/enforcement in some agencies ever locally) that this is a section that remains likely to be under-reported for all those reasons of staffing, resources, funding, and databases. So as we expand on NEIEEN and CDX support funding in the future, this would be one area I would simply say quite a lot of EPA-funded support would perhaps be needed over a very long time to acquire the information that is so clearly being desired here. ALSO it's important to note that this section doesn't yet seem to recognize or plan for the variety of agencies where one Title V source (eg a military base such as China Lake) might have been allowed & issued 10 Title V permits (neither AFS, nor ICIS-AFS envisions or allows multiple Title V permits I believe I'm seeing here). Similarly, there are many state/locals I've heard speak up on national calls over the years where unit by unit (or process-related) processing of permit issuance either did or continues to occur. For those agencies, the idea of one permit locally per facility is simply not the reality, nor would be the resources to enter every permit or every permit's modification information, nor every permit condition into ANY system (EPA or otherwise). So with this reality in mind, the idea of trying to fit a square peg of a single Title V or single local permit into ICIS-AFS is simply impossible & laughable as an exercise in frustration. As you well know, there will be a similar issue with how violations are cited, and around air program/pollutants for similar reasons, that locals do not simply directly adopt or quote the Federal CFR or CAA citations in their daily activities (some do some times, but almost none do all the time & many never do). So the fact that just like these multiple permit instances & groups that do not have access to the desired permit data specifics or in the desired mode or spin EPA is seeking to cast the data (MDR and Business Rules and design/wish of the ICIS-AFS system notwithstanding), this means this section MUST be OPTIONAL initially & perhaps for a very long time until this sort of diversity of actual reality can be sorted out & alternatives and funding to resolve it put in place. So these are just items related to permits, rules, air program/pollutants, size, and even # or applicability of permit conditions, dates of permits & permit revisions etc. that this section and others hope to capture, but which the existing design simply doesn't do anything close to justice to the reality on the ground. So just a heads-up keep this optional & prepare for variety, because anything else will make this portion fail at its intended function.			
5	Overall	We do not enter permit data. This is handled by the region. However, I am concerned with the statement that we have heard several times during the discussions: "If the agency, state/local, enters any permit data then ALL permit data will be required." This is a new requirement and would be very labor intensive.	Ken Mangelsdorf	South Coast, CA	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
6	1.0.1 Summary of Permit Modernization in ICIS-AFS	No Permit Status is required. Please delete. We do not need to track the status of a permit. We do not need to track Permit Tracking Events. These were mandated in the AFS Permit Module that is not in use today as a required entry. We do not need to track these items. AFS does not need to track Basic Reissuance Capability.	Betsy Metcalf	OC	2/24/2012
7	1.0.1 Summary of Permit Modernization in ICIS-AFS	There is no discussion of the Permit Status "Reissued". Is "Reissued" intended to be used for the typical 5-year renewal. for permit modifications (administrative, minor, or significant), or both.	Christy Monk	AL	2/24/2012
8	1.0.1 Summary of Permit Modernization in ICIS-AFS	Title V Permit tracking should be optional or done by permitting. All Title V Permit applications and revisions are sent to the Region for approval. The Region can tell you how they review permits. Hardcopies of all Title V permits are submitted to the Region so they may be able to provide you with electronic copies - if that seems necessary. PSD - Ventura is not delegated for PSD. As far as I know, the California Air Districts are not delegated for PSD.	Chris Cote	Ventura County, CA	2/24/2012
9	1.0.1 Summary of Permit Modernization in ICIS-AFS	One example here is the "Termination date" this module is expecting, and the idea that a Title V or other permit MUST terminate & then the whole plant is treated as CLOSED permanently, never to open again. In reality, new owners take over existing plants, getting new or different permits from the previous ones I believe in SOME state/local agencies. SOMETIMES a facility is partially permitted by the state/local for SOME things & SOMETIMES EPA also has a permit just for some part, such as Title v or NSR/PSD that was never delegated locally. SOMETIMES state regs or state permits MIGHT overlap with a local's, I suppose is a rare possibility. SOMETIMES a facility might sell off just PART of the facility & the original get a new or modified permit (perhaps changing or downsizing), while the other part MIGHT conceivable open as a NEW PLANT under a NEW unique & separate PERMIT. Similarly the are temporary closures frequently & corporate buyouts & manufacturing reasons that lead to alterations in the permit or any of the previously cited kinds of splitting & changing, & sometimes new equipment comes in and a new amendment permit or some revision to the existing permit may expand rarely to something larger than before. So whatever we do with this ICIS-AFS permit module we really MUST first survey & understand the variety of change that is the reality, practice, & legally possible & how & where that overlaps with EPA's expectations/sense of how EPA might do something. There is a lot more historic & flexibility out in the real air world than I believe this section is designed to accommodate, so much more dialog & planning with the state/locals & regions (& especially with their permit offices, who up until now really have not been consulted, or been part of the AFS community). If EPA needs this information (& I've seen no cost studies showing why such information might be needed or cost effective to expect in AFS),	John Borton	R9	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
		this 'nice to have' data may prove to be very costly and cumbersome and far more difficult to collect than has been planned for as we see this module evolving. So buyer beware, this is an area that may cost EPA a lot of time, money, & oversight/coordinating resources to even begin to collect as it seems to desire, because most current state/local (& regional) partners DO NOT have this sort of stuff easily on hand as EPA seems to presume or imagine.			
10	1.0.2 Permit Functional Requirements	Also, please note this module seems to presume that EPA-style federal regs are clearly outlined in all permits & clearly separated from non-federal limits, requirements, & permit conditions in some very obvious way. This too is a longstanding fallacy of both the permit & rules worlds that regions, states/locals have sought in vain to help explain or show to EPA (including the time when at a meeting of OECA & CAPCOA at Bay Area, one very frustrated Enf manager dropped a foot thick Title V refinery permit in front of the OECA manager and said, can you show me where in this EPA-approved permit, the air programs, pollutants, limits of various federal things, or even which rules/limits are reportable to EPA vs those that are not? The OECA senior manager was not able to do this & admitted this was a problem, but even after several subsequent calls & national meetings where this event was reminded to OECA & others and when CAPCOA again & again tried to reexplain this fact, it seemed to get lost or passed on by unresolved. So the point here is that there is a REALITY that both the permits & the rules not just in this region, but in many many state/local agencies nationwide DO NOT clearly or 100% of the time follow the EPA one for one make it easy for the compliance/enforcement folks to KNOW which ones directly relate to AFS-reportability or other reporting such as permits, revisions, etc. So please just know this is a longstanding area where in various venues & forums (including the last ICR comment period when APCO's themselves again tried to raise issues such as this and were largely overruled/ignored in the rush to move this system forward with the available moneys & scheduling, but this sort of issue will likely continue to be a big one, impacting or slowing/stopping some agencies whose programs do not look identical to EPAs or cite things identically to how EPA imagines would be ideal here in this evolving permit & other design. So this note is to let you know it's important to acknowledge this reality & this is why the entire permit section & perhaps some other parts of EPA's preferred design or edit check minimums in ICIS-AFS will likely have to be left as OPTIONAL or less specific than OECA might initially prefer simply in order to assure this project can move forward & not bog here for these reasons of such differences that do exist.	John Borton	R9	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
11	Table 1.0-1 ICIS-AFS Permit Requirements	3-10: Actions can be reported if desired, but should not trigger any Permit Status. 3-14: The system should not require any of the data in this section. We are not tracking Permit Reissuance. 3-15: If a permit is added to AFS, the user should have a special security role to delete permits. 3-17: No need to track historic permits in AFS.	Betsy Metcalf	OC	2/24/2012
12	Table 1.0-1 ICIS-AFS Permit Requirements	For the above cited reasons, I cannot at this time in this short a timeframe, comment more specifically on many details of the design, simply because the compliance/enforcement folk who feed AFS do not have that data at hand or in any way to obtain it.	John Borton	R9	2/24/2012
13	1.0.3 Permit Data Requirements	Alabama needs Field ID 2 (Permit Identifier) to have at least 12 characters and to allow the use of hyphens or an underscore	Christy Monk	AL	2/24/2012
14	Table 1.0-2 ICIS-AFS Permit Data Element Requirements	3: We do not track Master General Permit Identifiers and I do not understand why we need this. Please delete. 4: These permit categories are obsolete. If Categories are tracked they should be: Part 70 Title V, Part 71 Title V, Non Title V. 5: There is no requirement for this in the SRS and is BAH added functionality that we do not have a business need for. Please delete. 8. This should be included in the Permit Category and is not needed here. 9-10. These sections should not be hard coded-and could be an event instead of an added field. 13: Don't need the Permit Effective Date. Please delete.	Betsy Metcalf	OC	2/24/2012
15	Table 1.0-2 ICIS-AFS Permit Data Element Requirements	#12 Ventura has provided the Region with the original Title V Permit Issue dates. The issue date determines the due date of the Title V ACC's. The ACC due dates have also been provided to the Region so they can enter the ACC due dates in AFS.	Chris Cote	Ventura County, CA	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
16	Table 1.0-3 ICIS-AFS Permit Business Rule Requirements	1: No Part 70 or 71 needed as the Permit Category should handle this, don't need Permit Effective Date. The Permit Authority should be system generated. 3: If the Permit is a Part 70 or 71, the ability to add it without the issuance date should be available. 4, The new system will not need the Original Issue Date and the Effective Date. Users should be able to edit the Expiration date. 5: Users should be able to edit all entries for Permits. 7: This quality check is not needed. 10: This quality check is not needed. 11: This is not necessary. 12: This is not necessary for AFS data. The Permit Effective Date is not needed. 13. The new system will not be tracking the Permit Reissuance Expiration Date or the Permit Reissuance Effective Date. 14: Not necessary. 15-16: These tracking statuses are not requested or needed. 17: The Permit Status does not need to be generated by the system. 20: The Permit Termination date does not need to be tracked the date the Permit expires is all that is needed.	Betsy Metcalf	OC	2/24/2012
17	1.0.5 Add Permit	The Permit Categories need to be changed to: Part 70, Part 71, Non Title V Permit. Issue and Expiration Date should not be mandatory to establish a permit record, as the permit might not yet be issued and is pending.	Betsy Metcalf	OC	2/24/2011
18	1.0.5 Add Permit	Adding New Title V Permits: A new Title V Permit will probably issued to a facility that is already permitted. In this situation, we would check first to see if the facility number was archived in AFS. If the number was archived, we contact the Region so they can de-archive the facility. Then we can update the information in AFS. We don't expect any actual "New" Title V facilities to be built in Ventura County.	Chris Cote	Ventura County, CA	2/24/2012
19	1.0.5 Add Permit	This section specifies non-title v permits to construct (of which there MIGHT be multiples or iterative permits still relevant from as far back as the 1970's or older [South Coast & others in CA have been in existence & doing Air pollution work since LONG before EPA even existed, the South Coast district goes back to the 1940s, substantially predating EPA or the CAA]). Similarly I previously mentioned a small number (such as China Lake with 10 Title V permits I believe) do have multiple Title V permits and thus IF this data is needed in ICIS-AFS, the ability to allow for multiple Title V & other permits remains vital for this & other sections of the design document & database. This of course also applies to non-Title V permits, operating permits, or anywhere where multi-permits per unit or process are common, of which there are many agencies outside R9 as well with that sort of permitting.	John Borton	R9	2/24/2012
20	Figure 1.0-1 Use Case: Add Permit-Batch	Need to see Key Data Elements required.	Betsy Metcalf	OC	2/24/2011
21	Figure 1.0-2 Use Case: Add Permit-Web	Need to see Key Data Elements required.	Betsy Metcalf	OC	2/24/2011

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
22	Figure 1.0-3 Screen: Add Permit	Remove Effective Date and Permit Status, Part 70 or 71	Betsy Metcalf	OC	2/24/2011
23	1.0.6 Edit Permit	Users should be able to edit any Permit data elements except for the Name of Issuing Authority.	Betsy Metcalf	OC	2/24/2011
24	Figure 1.0-5 Use Case: Edit Permit-Batch	Need to see Key Data Elements required.	Betsy Metcalf	OC	2/24/2011
25	Figure 1.0-6 Use Case: Edit Permit-Web	Need to see Key Data Elements required.	Betsy Metcalf	OC	2/24/2011
26	Figure 1.0-7 Screen: Edit Permit	Remove Effective Date and Permit Status, Part 70 or 71, Termination Date	Betsy Metcalf	OC	2/24/2011
27	1.0.7 Delete Permit	Users need special delete authority.	Betsy Metcalf	OC	2/24/2011
28	Figure 1.0-9 Use Case: Delete Permit-Batch	Need to see Key Data Elements required.	Betsy Metcalf	OC	2/24/2011
29	Figure 1.0-10 Use Case: Delete Permit-Web	Need to see Key Data Elements required.	Betsy Metcalf	OC	2/24/2011
30	1.0.8 Search Permits-Web Only	Search should be for CAA permits only, not including NPDES permits in these screens. If users want to see NPDES permits, they should have to enter NPDES screens.	Betsy Metcalf	OC	2/24/2011
31	1.0.8 Search Permits-Web Only	Ventura County APCD is an air-only district. We would prefer that searching be limited to air facilities. We wouldn't be able to use or add any data to the water side.	Chris Cote	Ventura County, CA	2/24/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	AAShip	Date
32	Figure 1.0-11 Screen: Search Permit: Air and NPDES	Not needed.	Betsy Metcalf	OC	2/24/2011
33	Figure 1.0-12 Screen: Search Permit: Air	Facility ID is provided twice on this screen, what does it mean? It should be the SCSC ID. No SIC search.	Betsy Metcalf	OC	2/24/2011
34	Figure 1.0-12 Screen: Search Permit: Air	PLEASE NOTE - in relation to LCON searching & usage to identify or narrow a permit (or even a facility or on a report to count things belonging to one regional/state/local or tribal agency, one CANNOT search by just LCON field ALONE. Nationally when I invented & sold the LCON concept to various regions & others it was decided by a vote among the regions, that each region would control their own LCON table. Some regions were small & chose to have just a few LCONs numbered uniquely within the region, while others (R9 is the largest with 45 state/locals & 400 potential tribes), we in R9 (due to the large number and only 3 positions for the LCON, had to reuse some LCON numbers out of necessity. So the only nationally reliable way to track, query, or refer to LCON is really as a hybrid number made up of region+state+LCON that was assigned. OTIS is currently populated with all these for all regions and I am currently working on an updated chart in Excel for Betsy that may be out to her in the next month or two to further confirm/refine that for R9 once more. But bottom line the Booz Allen designers MUST KNOW is you cannot plan to capture/search/refer to LCON by LCON alone (there are overlaps state to state & region to region meaning the LCON by itself isn't unique enough for their programming/report needs. THEY MUST keep a table of REGION + STATE + LCON = name of agency for that purpose and it might change somewhat over time. Also please remember here that because AFS was Regional and state based largely for tracking storage & reporting, the Navajo Nation is a special situation where there are unique regional+state+local values for Navajo (because it's lands cross 3 regions, but R9 while responsible overall only had update rights in AFS to the R9 side of it) so there are also R8 & R6 small pieces of Navajo that hopefully ICIS by taking & coding with a broader view will be able to transcend the limitations of old mainframe AFS design.	John Borton	R9	2/24/2012
35	Figure 1.0-13 Screen: List Permit	We do not need the functionality of Permit Reissuance Transaction. The system should not generate a status, and no historical version of the permit records are necessary.	Betsy Metcalf	OC	2/24/2011
36	Figure 1.0-14 Screen: Reissue Permit	Not needed.	Betsy Metcalf	OC	2/24/2011

5.2   COMPLIANCE MONITORING

5.2.1   FCE-PCE-Investigation

Module Being Reviewed	Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations
Name	TIER 3 REVIEW
Date	3/9/2012
Organization	U.S. EPA/OECA/OC/ETDD
Summary of Changes - 6/15/2012	Per the EPA Comments Adjudication meeting on May 21, 2012, the following changes were made: Updated Summary of Modernization in ICIS-AFS has been updated to reflect the changes as a result of Comments Adjudication Added a point in the Summary section called Multiple Paths to Add Activities Key Data Element will be the Unique Identifier provided by the user Added Information Request (Section 114 Letter) to the Compliance Monitoring Activity Type option List to Link button is renamed to List More Eligible to Link Flow diagrams have been updated based on changes per this document Notional screens have been updated based on changes per this document The following fields have been removed from the Agency's Add/Edit screen: Compliance Monitoring Action Reason, Compliance Monitoring Agency Type, Was this a State, Federal, or Joint Compliance Monitoring Activity?, If Joint, what was the purpose of the participation, Which party had the lead?, Did you observe deficiencies?, Compliance Monitoring Action Outcome The following fields were added to the Agency Add/Edit screens: Were deficiencies found?, Who conducted, National Priority State Priority has been changed to a free text field Media has been changed to Multimedia Federal Statutes will set to "CAA" for Air Agency Users Programs has been renamed to Air Programs for Air Agency Users Pollutants Involved list will only display the Facility's polllutants in a pop-up window instead of a scroll down list box State will default to State in User's Profile Compliance Activity Type defaults to the selected option from the previous screen Region will default to Region in User's Profile PCEs reference types On Site and Off Site only. Stack Tests value has been removed PCE Type is an optional drop down Asbestos Demolition and Renovation has been removed Mobile Source Evaluations has been removed Added link to Alleged Violations

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
1	Overall	The word "Compliant" appears throughout this document, but given its usage in some places, I wonder if it is really supposed to be "Complaint". If not, I have no idea what a "Compliant Partial Compliance Evaluation" would be. I have never heard that term, nor is it defined in this document.	Christy Monk	AL	3/8/2012	
2	Overall	It is requested that the usage for the following fields in ICIS be supplied to determine if these fields should be replicated for CAA-ICIS: Compliance Monitoring Action Reason, Compliance Monitoring Agency Type, If State, Local or Tribal Lead, did EPA Assist?, Was this a State, Federal or Joint Compliance Monitoring Activity?, If Joint, what was the purpose of the participation of the other party?, Which part had the lead?, Did you observe deficiencies?, Deficences? If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? Did you observe the Facility take any actions during the inspection to address the deficiencies noted?, If yes, corrective action taken?, Did you provide general Compliance Assistance?, Did you provide site-specific Compliance Assistance?, Compliance Monitoring Action Outcome, Compliance Monitoring Rating Code, Federal Facility Activity, Federal Facility Activity Comment.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
3	Overall	I also share the other workgroup members' concerns regarding the likelihood that many of the data elements that are now marked Federal Only will become required for the States in the future. I understand EPA wanting a better system to manage its own program, but many States and locals have already designed their systems to address their own needs. I don't forsee many/any of those programs wanting or needing to use ICIS-AFS as its only management tool. It is one thing for us to have to reprogram our systems to create batch files to load into ICIS-AFS, it is another thing for us to add data elements to our systems thereby requiring the collection of additional information from program people.	Christy Monk	AL	3/8/2012	
4	Overall	ICIS AFS should have a top down functionality for entering multiple actions for a given facility online similar to the current AFS (IE-not requiring linking to the same Facility for each action entered) We do most of our action data entry in batch at Minnesota but our HPV pathways are all done online so they would benefit from the current top down process in AFS.	John Morrill	MN	3/6/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
5	Overall	Utah is willing to adapt to whatever the new ICIS AFS system requirements EPA needs. Our primary issue is that in the future, how EPA pulls its data must be crystal clear to all of the states. I don't believe Utah is alone in reviewing federal reports and being unclear how the head office obtained their numbers. For example, we have a historical issue that Tribal Sources are always included in EPA "unknown" inspection counts despite having Utah identifying them with an air program code of "I". Utah has no authority to ever inspect or otherwise regulate tribal sources. We also have a historical issue that EPA consistently has a different count for the number of Title V sources than the count Utah believes it has. This issue has been discussed numerous times between our managers and region VIII contacts and the issue is never resolved.	Susan Weisenberg	UT	3/7/2012	
6	.	It is helpful to have the documents to review prior to the calls. As questions get raised and issues get clarified during the calls, it is easier to understand the documents when re-reading them after the calls. Here are some general comments: 1. The proposed system splits inspection/evaluation from investigation. This adds another layer that doesn't seem necessary. 2. The proposed system splits some PCE's from other actions. The FCE's, PCE's, and other actions are put in one table, while the rest of the PCE's are put in another table. (The pick lists appear is separate sections on the screen.) This seems to create another unnecessary split and is confusing. Are they proposing sub-PCE's? It appears that you choose an action out of the main list and then choose a PCE from the second list. 3. The data flow for on-line users starts with actions and adds a facility to the action. While, AFS starts with facilities and adds the actions. This change is confusing. I kept wondering why the facility was "linked" but it appears that the facility is linked to the action rather than the action being linked to the facility. 4. Terminology is an on-going issue. The proposed system has added terms that are defined differently than legacy AFS. Terminology has been an issue in AIRS/AFS in the past because EPA/states/locals use the same terms to mean different things and different terms to mean the same thing. So, it will be helpful to have clear definitions on terms.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
7	Overall	On all the date requirements, it seems to make more sense to say before, during, or after.	Michelle Torreano	EPA, OECA, OC	3/8/2012	
8	1.0 Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations	The definition of PCEs needs to indicate that the activity results in a compliance determination. We would like to include 114 Letters in the Compliance Monitoring Module, if they can be easily linked to enforcement activity.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
9	1.0 Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations	The discussion on PCEs needs to indicate that a PCE results in a compliance determination.	Susan Weisenberg	UT	3/7/2012	
10	1.0 Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations	It's true that only one FCE would occur per facility per day. Ideally an FCE will only occur once per year per facility. There are cases where an FCE is completed early or late which can cause it to be a second FCE in a given Federal Fiscal year. There doesn't appear to be a field that shows which year an FCE or ACC belongs to. An FCE is a series of activities that covers all of the equipment at a facility. Compliance is determined on different days for the various equipment. The FCE is the summary of all the activities.	Chris Cote	Ventura County, CA	3/8/2012	
11	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	Data Elements Mapping: PCEs should reference types On Site and Off Site only. Please provide an optional list of all PCE types. Please remove Stack Tests from the ICIS-AFS Data Elements. PCE Type should be an optional drop down if an On or Off Site PCE is selected.	Betsy Metcalf, Rob Lischinsky, Dawn Minor	EPA, OECA, OC and DE	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
12	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	Asbesto EPA Evaluations are entered into ICIS and are assigned in ICIS ID, NOT an AFS ID. Should this be in the CAA-ICIS? Mobile Source Inspections by EPA under Sect 203 are entered into the system using the importer's name. They are assigned an ICIS ID and not an AFS ID. These actions should not be part of the CAA-AFS.	Laurie Kral	EPA, R10	3/6/2012	
13	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	How is linking to other CM activities to be retrieved? We agree with Option 2 for creating Key Data Elements.	Betsy Metcalf. Dawn Minor	EPA, OECA, OC, DE	3/8/2012	
14	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	Facility ID is marked as required in the table. Is this refering to the AFS number? If so, can it be automatically populated? Actual Start Date for FCE/PCE, not currently required in AFS. Not captured in internal database. Cannot be provided. Key Data Elements: We like Option 2, the system generates the identifier.	Kayra Johnson	MS	3/5/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
15	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	As a batch user, I would vote for Option 2 for the Key Data Elements question.	Christy Monk	AL	3/8/2012	
16	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	Please retain stack testing data codes unless EPA no longer has any interest in tracking this information.	Susan Weisenberg	UT	3/7/2012	
17	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	Key Data Elements - For NC, Option 2 is a better for us to keep tracking of the action numbering of each inspection performed at each facility. These action numbers exported to AFS via batch. The unique number for the FCE/FCE will be the action number from our action table for this facility. Each NC facility's action number table match the action numbers in AFS.	Bernard McKee	NC	3/8/2012	
18	1.0.1 Summary of FCEs, PCEs and Investigations Modernization in ICIS-AFS	<u>Page 4-1</u> What is FE&C? <u>Page 4-2</u> It says users will enter data "using the screens specific to the Air Program". Does this mean each Air Program will have its own screen? Data Elements Mapping -- Do the elements on this table apply only to Federal screens? -"<u>Compliance Monitoring Activity Type</u>" in the proposed system seems to add an extra layer. It splits actions between inspection/evaluation and investigation. Legacy AFS uses actions -- FCE's, PCE's, and investigations. That structure works and it's what we are used to. It seems that "Compliance Monitoring Activity Type" could be eliminated. -"<u>Compliance Monitoring Type</u>": ICIS groups most of the AFS "Action types" (FCE's and PCE's) under Inspection/Evaluation and calls them a "Compliance Monitoring Type". -PCE Type is a subset of PCE's. It seems that all the PCE's could be added to the Compliance Monitoring Type and the PCE Type could be eliminated. - The new list of Compliance Monitoring Types (aka Actions) shows FCE on-site and FCE off-site, which is good. The list has added several new types of CM Types (aka PCE's). 1. What is a "Compliant PCE"? If the result of the PCE is compliance, then that will be in the results code and doesn't have to be in the type name.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		2. The list doesn't have a have PCE on-site or PCE off-site but there is a PCE On-site Observation. It could just be an On-site Observation. This would follow the naming structure of the other types of Actions/PCE's/CM Types listed below it. What are the "Proposed PCE Types"? This section is blank but the PCE's are in the list above it. Is the idea to use both the Compliance Monitoring type and the PCE type? This seems more complex than it needs to be. What is an EPA Grantee (not state)? Is this referring to the local grantee districts? Page 4-3 Programs would be more clear as Air Programs. -What is "Date of Evaluation"? This is marked as an MDR. Is this a federal field? If so, it would help to flag this as federal only. -Is there a Date of Evaluation in AFS? I don't remember it. -Date Achieved is in Legacy AFS and corresponds to the Actual End Date. -State Priorities and linking need to be optional. -Linking: All actions are linked to a facility. The only actions that need to be linked are for violations.C11				
19	1.0.2 FCEs, PCEs and Investigations Functional Requirements	EPA wants only 2 types of PCEs identified: On and Off Site. We want an optional menu of types of PCEs available to further define the activity if desired.	Betsy Metcalf, Rob Lischinsky	EPA, OECA, OC	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
20	1.0.2 FCEs, PCEs and Investigations Functional Requirements	Entering the reviewers First and Last Name, Phone and Address should be optional. Entering Deviations will be an optional add in for NC.	Bernard McKee	NC	3/8/2012	
21	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-9: The user should not have to select Compliance Monitoring, then Compliance Monitoring Activity Type, then Compliance Monitoring Types. An online user should just have to select Compliance Monitoring, then pick the CM type from a drop down list. The CM Activity Name and Region should be System Generated. This module should only require the Federal Statues and Air Programs. The Law Sections should be compiled with the Air Programs, to provide only two definitions of the regulations: Federal Statute and Air Programs. The CM Types, Action Reason and Agency Type should not be required. The CM Agency Name should be system generated.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
22	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-10: The user should not have to select Compliance Monitoring, then Compliance Monitoring Activity Type, then Compliance Monitoring Types. An online user should just have to select Compliance Monitoring, then pick the CM type from a drop down list. The CM Activity Name and State and/or Local Control Region should be System Generated. The Actual Start Date should be optional. This module should only require the Federal Statues and Air Programs. The Law Sections should be compiled with the Air Programs, to provide only two definitions of the regulations: Federal Statute and Air Programs. The CM Types, Action Reason and Agency Type should not be required. The CM Agency Name should be system generated. Please provide information on how the State Priority indicator would be formatted, as we do not have any requirements for this at this time.	Betsy Metcalf, Chris Cote	EPA, OECA, OC, Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
23	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-11: Please INCLUDE Air pollutants. 4-13: Planned or actual start date on CM activities in general is Enforcement Sensitive. 4-16-35: How is this information to be retrieved? Not sure how the logic works to retrieve these types of linkages.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
24	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-9: Please identify the values of the Deficiencies table.	Laurie Kral	EPA, R10	3/6/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
25	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-10 Actual Start Date is not a MDR.	Kayra Johnson	MS	3/5/2012	
26	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-10: The user should not have to select Compliance Monitoring, then Compliance Monitoring Activity Type, then Compliance Monitoring Types. An online user should just have to select Compliance Monitoring, then pick the CM type from a drop down list. The CM Activity Name and State and/or Local Control Region should be System Generated. The Actual Start Date should be optional. This module should only require the Federal Statues and Air Programs. The Law Sections should be compiled with the Air Programs, to provide only two definitions of the regulations: Federal Statute and Air Programs. The CM Types, Action Reason and Agency Type should not be required. The CM Agency Name should be system generated. Please provide information on how the State Priority indicator would be formatted, as we do not have any requirements for this at this time.	Susan Weisenberg	UT	3/7/2012	
27	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	4-11: Please INCLUDE Air pollutants.	Susan Weisenberg	UT	3/7/2012	
28	Table 1.0-1 ICIS-AFS FCEs, PCEs and Investigations Functional Requirements	Page 4-4 4-1 This list of Compliance Monitoring Data shows a PCE On-Site and a separate Observation while the list on page 4-2 has them as one action type. 4-3 This list should add a PCE off-site which is currently used for off-site record reviews. Page 4-4 4-5 says the system shall allow the user to "edit" data. Will we be able to change CM types/action types? In legacy AFS the action types (CM types) cannot be changed when there are errors. For example, I entered a resolving action in AFS but used the code "S0" - that's S-zero - which is a typo. I found the error during a review but couldn't change the action type to the correct code - "SO". I had to add another action to resolve the HPV, which was late, and leave the typo in the sequence. I hope data errors in the new system are easier to fix.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		Page 4-5 4-9 for federal users: As we discussed on the call Federal Statutes and Law Sections need to be clarified. Are you referring to NSPS, MACT, subparts? Or are you referring to specific citations. The program level is more likely to be available to users. -Changing "Programs" to "Air Programs" would align better with legacy AFS. Is the Compliance Monitoring Action Outcome the Results Code? What is the Compliance Monitoring Rating Code? 4-10: "Compliance Monitoring Activity Type": We discussed on the call that this is a comment field. Maybe it could be labeled as a comment field or reason. Facility ID in legacy AFS is the state/county/local ID. SS/CCC/LLLLL format. Actual Start Date is this the Date Scheduled? If so, this is currently optional but is shown in this list as an MDR. It should be optional. Actual End Date: is this the Date Achieved? If so, this is a current MDR. As we discussed on the call Federal Statutes and Law Sections are optional for states/locals, and they need to be defined for federal users. Changing "Programs" to "Air Programs" would align better with legacy AFS. What is the state statute? This field would be used for violations but not inspections. Compliance Monitoring Action Reason: What is this and why is it marked as an MDR? Compliance Monitoring Agency Type: The system should be able to know this based on a user's information. Did you observe deficiencies? Should the term be deviations? Government Contacts: who is this referring to? The inspectors? The person entering the data? Page 4-7 4-10 Cont'd: State Priority doesn't seem necessary but it should be optional. Multimedia indicator? Do we need this? OTIS shows the other agencies that report data on the same facility. Is the Compliance Monitoring Action Outcome the Results Code? 4-11: The investigation screen seems to be for federal users as it refers to EPA inspectors. 4-14: Refers to search tools. Will we be able to write our own queries to get data out of the system. This is an important function. 4-15: Linking doesn't seem necessary, except for linking violations.				
29	1.0.3 FCEs, PCEs and Investigations Data Requirements	Batch: Must be valid date in **yyyy-mm-dd format. Now the format is yy-mm-dd. 2 digit or 4 year? However , the dates displayed in the ICIS-AFS screens are MM-DD-YYYY format.**	Bernard McKee	NC	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
30	Table 1.0-2 ICIS-AFS FCEs, PCEs and Investigations Data Requirements	Please ensure dates are presented as MMDDYYYY. 51: Please include In Compliance as a valid outcome.	Laurie Kral	EPA, R10	3/6/2012	
31	Table 1.0-2 ICIS-AFS FCEs, PCEs and Investigations Data Requirements	Item 4. Facility ID- if it's AFS ID can it be automatically populated on the screen. If actions are entered under a facility umbrella, the AFS ID could just appear on the screens under that "umbrella". 7-Actual Start Date: not an MDR, therefore should not be a "system" requirement. Item 19- Not MDR, shouldn't be a requirement.	Kayra Johnson	MS	3/5/2012	
32	Table 1.0-2 ICIS-AFS FCEs, PCEs and Investigations Data Requirements	Entering the reviewers First and Last Name, Phone and Address should be optional and not listed on the screen. Entering the number of deviations per violation will be an optional add in for NC.	Bernard McKee	NC	3/8/2012	
33	Table 1.0-2 ICIS-AFS FCEs, PCEs and Investigations Data Requirements	Page 4-8 Shows Compliance Activity Type, but Page 4-2 shows this as the Compliance Monitoring Activity Type. Page 4-9: 2. Compliance Monitoring Activity Name: As discussed on the call, this is a comment field or reason. Maybe it should be labeled as a comment field or reason. 4. Facility ID: What is a "Foreign Key of Linked ID"? 5. Planned Start Date: Does this replace the "Date Scheduled". 6. Planned End Date: Is this a new field? 7. Actual Start Date: Is this a new field? 8. Actual End Date: Is this the date achieved? Date Fields: Are on-line users switching to a mm/dd/yyyy date format? That would be good. 9. Federal Statutes: During the call it was stated that this field is mandatory for federal	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		users and optional for states/locals. This field shows it as required by both types of users. 10. Programs. Are these Air Programs? 12. The 2 layers of Compliance Monitoring Type and Compliance Activity Type are unnecessary. Splitting investigations from inspection/evaluation adds another layer that doesn't seem to help. In legacy AFS, Investigations are an action type. The proposed system has a Compliance Activity Type of Investigation and a value of Investigation. It would be simpler to leave Investigations as another action type/compliance activity type. Values: The values listed under Inspection/Evaluation include the 2 FCE's. The rest of the values are PCE's. What is a Compliant PCE? The list includes a number of new, more specific PCE's. Most of the PCE's listed after investigation are new - at least for states/locals. There is only one item in the list for stack test. Legacy AFS has multiple values for stack tests that include: Source Test Observed, Source Test Unobserved, and Source Test Not Required. (Here's a side note on AFS: AFS uses the same code for Source Test Unobserved and Source Test Results. This is confusing because the source test and review occur on separate dates. If you report both dates, there appears to be a duplicate. The emphasis has been to report the test date rather than the review date.) 13. This category of PCE type seems to suggest that you would choose a value/action from the list in #12 and then choose a value from #13. This is confusing and the 2 layers seem unnecessary. The PCE's in the #13 list could be added to the values/actions/PCE's in #12. 15. What is biomonitoring? Is this for the water program? Is this necessary to include on screens for the air program?				
34	Table 1.0-2 ICIS-AFS FCEs, PCEs and Investigations Data Requirements	ID 42, delete SIC codes; 46, I think if we're keeping this, it should be free text and no list of values;	Michelle Torreano	EPA, OECA, OC	3/8/2012	
35	Table 1.0.3 ICIS-AFS FCEs, PCEs and Investigations Business Rule Requirements	Items 16-17- "did EPA assist" should not be required.	Kayra Johnson	MS	3/5/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
36	Table 1.0.3 ICIS-AFS FCEs, PCEs and Investigations Business Rule Requirements	Page 4-18 6. Facility/Permit issues. Some agencies issue permits to each piece of equipment rather than a facility. Some agencies may have issues with the facility concept. 7. The system shall ensure that the linked Enforcement Actions exist in the system. This is unclear. Does this mean the system will verify that the actions exist before you can link them? Or, that a list of actions for the facility will be shown and you can choose the actions that you want to link to? Other? 8. The system shall ensure that the linked Inspections/Evaluations exist in the system. How will this work? 9. thru 11. Why are all of these fields set up for linking? Is this for linking actions to violations? 12. thru 14. The system will generate CMS status based on whether an FCE is added, edited or deleted. Page 4-19 15. thru 17. Did EPA Assist? It seems this field could default to "No". 18. Only one federal statute can be selected. Is this a federal only field? 19. Planned date - this should be optional for state/local users. 20. Planned End Date must be less than or equal to today's date. ok 21. Only the Actual Start Date or Actual End Date must be entered. Another screen shows both fields as MDR's 22. Actual Start Date is less than or equal to Actual End Date. ok 23. Actual End Date must be less than or equal to today's date. ok 24. and 25. Fields for joint inspections need to be optional. 26. Did you observe deficiencies? This should be optional for states/locals. Water pollutants are listed here. Should they be included here? 27. and 28. Questions on deficiencies should be optional for states/locals. 29. Water pollutants are listed here. Should they be included here?	Chris Cote	Ventura County, CA	3/8/2012	
37	1.0.5 Add FCEs, PCEs or Investigations	Batch: Actual start date is not an MDR and not currently a part of the data we batch to AFS. Should not be required by the system.	Kayra Johnson	MS	3/5/2012	
38	1.0.5 Add FCEs, PCEs or Investigations	The data elements listed as being required to add a new FCE/PCE/Investigation on Page 4-20 do not indicate that "Region" and "Compliance Monitoring Reason" are federal as indicated in Table 1.0.3	Christy Monk	AL	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
39	1.0.5 Add FCEs, PCEs or Investigations	The last sentence in this section: "Only users with enforcement sensitive privileges will be allowed to view and add enforcement sensitive Investigation Planned Start Date and Actual Start Date." Are investigations enforcement sensitive? Is this new? Are the Required Data Elements listed in this section federal only? Region: The system should know the Region based on a user profile. Federal Statutes: As we discussed on the call this needs to be clarified. Law Sections: As we discussed on the call this needs to be clarified. Programs: These are probably Air Programs. Compliance Monitoring Reason: Has a pick list but might be better as a comment field. Compliance Monitoring Agency Type: System should know states/locals by profiles.	Chris Cote	Ventura County, CA	3/8/2012	
40	Figure 1.0-1 Use Case: Add FCEs, PCEs and Investigations-Batch	I do not understand what is meant by "Validate Key Data Elements" and "Validate Non-Key Data Elements". Schema validation is performed on key and most non-key elements at CDX before the XML arrives at ICIS so all that is left to do is validate the data against the ICIS Batch business rules. What is being done here that I am not realizing? Also, please change all occurrences throughout this and future documentation of "Write to Audit Trail Table" to "Write to Audit Table" because we do not call it an "Audit Trail" table in the ICIS Batch world.	Alison Kittle	EPA, OECA, OC	3/8/2012	
41	Figure 1.0-1 Use Case: Add FCEs, PCEs and Investigations-Batch	We prefer option #2. Currently in AFS, we assign the action number in our state system and upload it with the action record to AFS. This works fine for us.	Debra White	VA	3/8/2012	
42	Figure 1.0-1 Use Case: Add FCEs, PCEs and Investigations-Batch	Will action codes values vary by Region as they do in legacy AFS? or will we use terms instead of codes? It seems like the batch users would need to use codes and might want to use the codes they are used to.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
43	Figure 1.0-2 Use Case: Add FCEs, PCEs and Investigations-Web	The user should be able to select the facility first, and then add FCE/PCE actions. The user should not have to reselect the facility for each action.	Betsy Metcalf, Christy Monk	EPA, OECA, OC, AL	3/8/2012	
44	Figure 1.0-2 Use Case: Add FCEs, PCEs and Investigations-Web	1. Diagram should start with "User selects a Facility". 2. "User chooses to add action" should be second because on-line users will want to add multiple actions at one time. What are the Non-Key data elements? The system generates current CMS status. What is the CMS status based on?	Chris Cote	Ventura County, CA	3/8/2012	
45	Figure 1.0-3 Notional Screen: Add FCEs, PCEs and Investigations (Federal)	Need to incorporate valid CMS indicators here.	Laurie Kral	EPA, R10	3/6/2012	
46	Figure 1.0-3 Notional Screen: Add FCEs, PCEs and Investigations (Federal)	CM Media- media indicator should be multi-media indicator	Michelle Torreano	EPA, OECA, OC	3/8/2012	
47	Figure 1.0-4 Screen: Add FCEs, PCEs and Investigations (Agency)	The user should be able to select the facility first, and then add FCE/PCE actions. The user should not have to reselect the facility for each action. The alternative mentioned during the call (a copy action button) may be a reasonable solution, but picking a facility to work with and then selecting the activity to add would be the most desirable.	Betsy Metcalf, Christy Monk	EPA, OECA, OC, AL	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
48	Figure 1.0-4 Screen: Add FCEs, PCEs and Investigations (Agency)	Change Identifier to AFS ID. Will stack tests be reported in this same screen? Contact information refers to inspector? not an MDR. Should not be required data, either by system or as MDR. Looks like it should be a facility level field. May need a button that allows to add another action so users don't have to go back several screens if they want to enter numerous actions at once.	Kayra Johnson	MS	3/5/2012	
49	Figure 1.0-4 Screen: Add FCEs, PCEs and Investigations (Agency)	User should be able to enter multiple actions for a facility without looking up the facility record each time.	Debra White	VA	3/8/2012	
50	Figure 1.0-4 Screen: Add FCEs, PCEs and Investigations (Agency)	Page 4-28 The screen should start with the facility info and then show the activity. Section 1. -- Should be Section 2. Compliance Monitoring Info: Compliance Activity Type: It doesn't seem necessary to split inspection/evaluation from investigation unless there's a plan to treat investigations differently than Legacy AFS. An earlier page referred to investigations as having "enforcement sensitive" characteristics. Is this the case? Is this new? Is it necessary? Compliance Monitoring Activity Name: This was described as a comment field on the call. Section 1. Compliance Monitoring Type: 2 FCE's and most of the PCE's are included in this section. A second set of PCE's are listed in Section 4 below. Legacy AFS has all FCE's and PCE's together. Is it necessary to split them? And have sub-types of PCE's? Section 2: -- Should be Section 1. Why is this a linked facility? Is it because the flow chart starts with actions rather than facilities? This is confusing. Program System Acronym: Is this ICIS-AFS? If not, what is it? Identifier: Is this the facility ID? Many on-line users currently use the CDS ID as the 10 digit Facility ID. (2 state, 3 county, and 5 Facility) The AFS ID has a longer space for the Facility ID. Facilities Tab: Is this a pick list of facilities by agency or LCON? Section 3: Compliance Monitoring Dates: Only the Actual Start Date or Actual End	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		Date are MDR's. Legacy AFS only requires the End Date. Section 4: Programs are Air Programs. PCE Table: All the FCE's and PCE's could be listed here. Pollutants Involved: Will this provide a pick list of the pollutants associated with the facility? Compliance Monitoring Reason: This is new. Is it an MDR? Compliance Monitoring Agency Type: This is a new field. The system should know based on user profiles. Page 4-29 Section 1. Link to Report: This is a new field and should be optional. We have many concerns about electronic documents and have very little information on what is being proposed or how it will work. Section 2. Government Contacts: Is this for the person entering data? If so, the system should know from user profiles. Section 3. Compliance Monitoring Media: Multimedia indicator: Is this relevant for states/locals? If it stays, it should be optional. Section 4. Compliance Monitoring Action Outcome: is this the AFS "Results" code? Section 5. Regional Priority and State Priority are new fields and should be optional for states/locals. Section 6. User Defined Fields: These fields are new and should be optional for states/locals.				
51	1.0.6 Edit FCEs, PCEs and Investigations	This section discusses linking. Is the idea to link violation related actions? Or, are other types of actions expected to be linked? There's a reference to "Key Data Elements in Section 1.0.1." It appears that ICIS will not be numbering actions the way AFS does. So does that mean that if we want to find an action to update it, we would search for it under Facility ID, Date, Action Type, and User provided value? This group of fields was referred to as the <u>Key Data Elements</u>.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
52	Figure 1.0-5 Use Case: Edit FCEs, PCEs and Investigations-Batch	I do not understand what is meant by "Validate Key Data Elements" and "Validate Non-Key Data Elements". Schema validation is performed on key and most non-key elements at CDX before the XML arrives at ICIS so all that is left to do is validate the data against the ICIS Batch business rules. What is being done here that I am not realizing? Also, please change all occurrences throughout this and future documentation of "Write to Audit Trail Table" to "Write to Audit Table" because we do not call it an "Audit Trail" table in the ICIS Batch world.	Alison Kittle	EPA, OECA, OC	3/8/2012	
53	Figure 1.0-5 Use Case: Edit FCEs, PCEs and Investigations-Batch	The diagram shows "Validate the Key Data Elements". Is this the same set of Key Data Elements referred to above?	Chris Cote	Ventura County, CA	3/8/2012	
54	Figure 1.0-6 Use Case: Edit FCEs, PCEs and Investigations-Web	How does an on-line user identify the facility/action that they want to update? The diagram doesn't show this step.	Chris Cote	Ventura County, CA	3/8/2012	
55	Figure 1.0-7 Notional Screen: Edit FCEs, PCEs and Investigations	Page 4-38 Compliance Activity could be eliminated. Compliance Monitoring Activity Name: Is this a pick list or memo field? Programs: This has been discussed as Air Programs, but this text is a regulation.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
	(Federal)	Compliance Monitoring Type: is in Section 1 and Section 4. Does it have to be listed twice? PCE Type: PCE should be combined with the Compliance Monitoring Type. The PCE type could be eliminated. Action Reason: should be optional. Agency Type: system should know this from the user profile. Pollutants involved: should be the ones for that facility. Link to Report: this is new and should be optional. Page 4-39 Government Contact: This is a new field and should be optional. Multimedia indicator: Is this relevant for state/local users? This is new and should be optional. Outcome: appears to replace the AFS Results code. Regional and State Priorities are new fields and should be optional.				
56	Figure 1.0.11 Notional Screen: Related Enforcement Actions	Is the idea to link enforcement actions at different facilities together? There are times when the same company has multiple facilities with violations. All of these violations may be combined into one case. Is this feature designed to handle this type of situation?	Chris Cote	Ventura County, CA	3/8/2012	
57	Figure 1.0.11 Notional Screen: Related Enforcement Actions	I would change List to Link button to List and Link.	Michelle Torreano	EPA, OECA, OC	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
58	Figure 1.0-13 Use Case: Delete FCEs, PCEs and Investigations - Batch	I do not understand what is meant by "Validate Key Data Elements" . Schema validation is performed on key and most non-key elements at CDX before the XML arrives at ICIS so all that is left to do is validate the data against the ICIS Batch business rules. What is being done here that I am not realizing? Also, please change all occurrences throughout this and future documentation of "Write to Audit Trail Table" to "Write to Audit Table" because we do not call it an "Audit Trail" table in the ICIS Batch world.	Alison Kittle	EPA, OECA, OC	3/8/2012	
59	Figure 1.0-13 Use Case: Delete FCEs, PCEs and Investigations - Batch	If no linked records found, the arrow should go to Delete FCE/PCE/Investigation.	Michelle Torreano	EPA, OECA, OC	3/8/2012	

5.2.2 Stack Test

Module Being Reviewed	**STACK TESTS**
Name	TIER 3 REVIEW
Date	4/13/2012
Organization	U.S. EPA/OECA/OC/ETDD
Summary of Changes - 6/5/2012	Per the EPA Comments Adjudication meeting on May 21, 2012, the following changes were made: Updated Sumarry of Modernization in ICIS-AFS has been updated to reflect the changes as a result of Comments Adjudication Added a point in the Summary section called Multiple Paths to Add Activities Key Data Element will be the Unique Identifier provided by the user List to Link button is renamed to List More Eligible to Link Added new business rules requirement to the Business Rule Requirements table to count Stack Tests by each unique Pollutant Tested and not by the number of runs. Requirement 5-4 in the Functional Requirements table has been updated to state that users can only delete manually entered Stack Test data. Flow diagrams have been updated based on changes per this document Notional screens have been updated based on changes per this document The following fields have been updated to the Stack Test screens: Purpose of Stack Test is system required Stack Test Description is no longer a data element on the Stack Test screens Added a new required data element called Conducted By Date Test Completed is programmatically required Date Test Results were Reviewed is programmatically required Pollutant's Test Result is programmatically required Changed "Date Received" to "Date Report Received" Air Programs and Additional Regulation Details are now associated to each Pollutant Added two new Pollutant Test Results: N/A and Incomplete

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
1		This document leads the reader to believe that fields will be made available for users to input stack test emission information if the data is not available from the ERT. It is not EPA's intention to create another database requiring input of stack test data that is already covered by the ERT database. Please remove any reference to data entry of stack test information that would normally be provided by the data in stack test reports from the ERT. Stack tests need to be counted in a standard way, acceptable to both the Air Program and the Enforcement Program. Currently, agencies are allowed to enter stack tests in AFS for each pollutant tested. This data is not considered reliable, as agencies are reporting tests for individual runs and runs completed over several days. This results in an exaggeration of the number of stack tests completed in the country.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		The Enforcement Program wants to be able to count stack tests by pollutant, as compliance is evaluated by pollutant. EPA needs to ensure that we have business rules in place to cover the counting and reporting of stack tests in this manner. Several tables have lines of data that are highlighted. It is assumed that these are background processing, is this correct? This module discusses the ability to link data together but not the usefulness of the linkage. Linkage appears useful only for users browsing the data. The linkages must be retrievable if they are to provide any value to the CM/E programs. Please provide examples of how this information can be retrieved and used by EPA and State/Local agencies.				
2		Link to the latest ERT developments that was updated on April 4, 2012 1)Promulgated Regulations with Electronic Data Reporting Requirements and 2) EPA Methods and Pollutants Supported by the Electronic Reporting Tool (ERT) http://www.epa.gov/ttnchie1/ert/index.html	BERNARD MCKEE	NC DENR	4/13/2012	
3		There appears to be some misunderstanding regarding the Emissions Reporting Tool (ERT) data and source (stack) test reporting in ICIS-AFS. First, not all stack tests are required to be reported by regulated sources using the ERT. The recently published MACT revisions that reference ERT reporting primarily apply to initial source tests and represent a very limited number of regulated sources subject to those MACT requirements. Most of our sources that require stack testing do not fall into those specific MACT categories. Second, there seems to be a misunderstanding of what the ERT was developed for and what its data actually represents. The ERT (and related limited MACT rule revisions) were developed solely to improve emission factors. The ERT data was never intended to be used for compliance determinations or AFS data reporting. The data points collected in the ERT may not include a data set necessary to determine compliance or to validate a source test. For instance, with a particulate test there are intermediate data points used to calculate values, which we need to verify for accuracy. Calculation errors with these intermediate data points can lead to false results. We frequently find calculation errors and in those instances source test reports need revision or a re-test. We cannot rely on ERT data for or own compliance determinations, so we need to continue to require regulated sources to submit the data in an acceptable format to us. Additionally, source test methods and data requirements per our rules, permit conditions and source test protocols often call for different or additional data points than the EPA method. Again, many of our required data points are not in the ERT. As currently designed, the ERT does not provide us with the information to determine	Greg Gjerde	San Diego APCD	4/13/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		compliance. We hope that will not have to review ERT data in addition to the data we require, as that would be burdensome and duplicative. At this time, we recommend not including ERT in ICIS-AFS and limit it to developing emission factors. We recommend continuing with the pass/fail data we now have in AFS. With ERT, we are concerned that inaccurate data may be placed in the public domain before it has been fully reviewed. We understand that data must be reviewed promptly, but the 120-day deadline can be too limiting at times. Sources can have up to 60 days to submit data, which leaves agencies with many tests to review limited time to finalize. EPA should re-think this deadline. We are all for electronic reporting and the reduction in paper it brings, but as designed to date, ERT won't give us the information we need. When EPA does implement ERT, we recommend keeping information out of the public domain until test results are verified, as incorrect info will bring unintended consequences to all involved.				
4	1.0 Stack Tests	Please delete the sentence "Stack test reviews may be conducted as part of a Partial Compliance Evaluation (PCE)." as this is not entirely true.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
5	1.0 Stack Tests	The agency has 120 days to review and submit the stack test result to AFS. The review should be conducted by the agency in the ERR/ERT. The regulated community should only have to submit the stack test report via the ERT for available test methods. The regulated community in NC does not want to be required to send a report to the EPA and the governing agency.	BERNARD MCKEE	NC DENR	4/13/2012	
6	1.0 Stack Tests	Data should not be imported from an EPA reporting repository like ERT for the reasons spelled out above.	Greg Gjerde	San Diego APCD	4/13/2012	
7	1.0.1 Summary of Stack Tests Modernization in ICIS-AFS	Under Pollutant Test Results, this section infers that the system will generate a percentage (of what?) based on the allowable limit and actual number. This information will NOT be required for data entry if the test information has not been imported from the EPA Reporting Repository.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
8	1.0.1 Summary of Stack Tests Modernization in ICIS-AFS	Pending Code (99) should be the only indicator listed for a Facility stack test report submitted to the EER/ERT that is waiting to be reviewed in the ERR/ERT by the governing agency.	BERNARD MCKEE	NC DENR	4/13/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
9	1.0.1 Summary of Stack Tests Modernization in ICIS-AFS	(See overall comment above) The actual data to successfully determine compliance by the state and local agency may not be in ERT. There is no need for any notifications of pending statuses. It is not necessary.	Greg Gjerde	San Diego APCD	4/13/2012	
10	1.0.2 Stack Tests Functional Requirements	"Stack Test Description" is marked as required, it is assumed that this explains who did the test and whether or not is was observed. Or is this the purpose? It would be valuable to mark "Date Test Results were Reviewed" as required. ID 5-9 is not necessary. No stack test emissions will be entered into the system. Stack Test emissions will be imported from the EPA Reporting Repository. IDs 5-16 through 5-24 are questionable, as it is not defined how these linkages can be used and retrieved.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
11	1.0.2 Stack Tests Functional Requirements	There is no need for ERT stack test data in AFS.	Greg Gjerde	San Diego APCD	4/13/2012	
12	Table 1.0-1 ICIS-AFS Stack Tests Functional Requirements	There are too many fields in this section. All that is needed are (1) pass/fail, (2) date test was done (3) pollutant.	Greg Gjerde	San Diego APCD	4/13/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
13	1.0.3 Stack Tests Data Requirements	The unique identifier for Stack Tests is listed as a system generated unique identifier. This is OK for general tracking, but not for linkage in enforcement cases. ID 3 indicates that the Facility ID is a "foreign key of linked facility". This is unclear and needs to be further defined. ID 5 lists the purposes of stack tests, the system needs to indicate that the "Performance Test Demonstrating Compliance" is the test that will be counted for National Reporting purposes. 14 should be listed as "PR".	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
14	1.0.3 Stack Tests Data Requirements	This section should be eliminated. Stack test data does not belong in AFS.	Greg Gjerde	San Diego APCD	4/13/2012	
15	Table 1.0-3 ICIS-AFS Stack Tests Business Rule Requirements	This table should reflect that stack tests are counted by POLLUTANT TESTED. If a stack test is completed at a facility and is testing NOX and Sulphur Dioxide, and there are three runs at two stacks, then the test is counted as TWO: one for NOX and one for Sulphur Dioxide. This is how information will be compiled in the report from the Regulations Tab of the ERT providing the Regulation Citation, the Compound (Pollutant), the Numerical Limit, the Units of Regulation, the Process Parameter used in Regulation, and the Process Units used in Regulation. ICIS-AFS will use the method of count to provide consistency in the new system. BAH has asked a question concerning limit minimums. The values used should be taken directly from the ERT's Stack Test report, and no formulas will be necessary, as the system will not be generating any emissions values. ID 12: The data will be extracted from the ERT Stack Test report, our business rules should not accept the data if there is a difference. The value of IDs 13-18 is not obvious, please advise.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
16	Table 1.0-3 ICIS-AFS Stack Tests Business Rule Requirements	This section needs major streamlining and to be adjusted so it doesn't reference test data. Most of the items should be eliminated as well as linkage requirements. Linkage is optional and should remain so.	Greg Gjerde	San Diego APCD	4/13/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
17	1.0.5 Add Stack Tests	The national initiatives box should not appear on the state or local person's screen since they do not apply. All screens should be de-cluttered. Currently unused fields or field not relevant to the user should not be displayed. In our local system we have fields as place holders for possible future use. These unused fields are hidden and do not clog up our screens. If some need additional fields have them appear on their screens only by user ID. Please consider this.	Greg Gjerde	San Diego APCD	4/13/2012	
18	Figure 1.0-1 Use Case: Add Stack Test --Batch	This figure indicates that the only required entry is the Stack Test Identifier (Key Data Element). The request for Use Cases was the identification of information that is required to complete this record. This is not a complete list of required data for this activity.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
19	Figure 1.0-3 Notional Screen: Add Stack Test	Please do not use RATAs as an example in future notional screens. Please use the purpose of demonstrating compliance. Use of a performance test type that is not used for national reporting will result in confusion. Please mark "Date Test Completed" and "Date Test Results Reviewed" as mandatory reporting.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
20	Figure 1.0-4 Use Case: Edit Stack Test-Batch	This figure indicates that the only required entry is the Stack Test Identifier (Key Data Element). The request for Use Cases was the identification of information that is required to complete this record. This is not a complete list of required data for this activity.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
21	Figure 1.0-5 Use Case: Edit Stack Test-Web	It is assumed that to edit an existing record the user would need the unique identifier to access the record.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
22	Figure 1.0-6 Notional Screen: Edit Stack Test	Please mark "Date Test Completed" and "Date Test Results Reviewed" as mandatory reporting.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
23	Figure 1.0-7 Notional Screen: Edit Imported Stack Test	It is too early to finalize requirements for this screen, and should be addressed during design.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
24	Figure 1.0-10 Notional Screen: List of Compliance Monitoring Activities for Linking	It is unclear how these linked activities can be extracted for use in targeting and planning.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
25	1.0.7 Delete Stack Test	Delete should not be too easy. Recommend role based access.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
26	Figure 1.0-18 Notional Screen: List Stack Tests	The Stack Test delete function should be optional and available if needed	BERNARD MCKEE	NC DENR	4/13/2012	
27	Figure 1.0-18 Notional Screen: List Stack Tests	This screen looks good.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
28	1.0.10 Appendix: Method Codes	We should probably add a column to this table that indicates whether or not the ERT is currently supporting the method.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	

5.2.3 TV ACC

Module Being Reviewed	Title V Annual Compliance Certifications
Name	TIER 3 REVIEW
Date	3/9/2012
Organization	U.S. EPA/OECA/OC/ETDD
Summary of Changes - 6/5/2012	Per the EPA Comments Adjudication meeting on May 8, 2012, the following changes were made: Updated Summary of TV ACCs Modernization in ICIS-AFS has been updated to reflect the changes as a result of Comments Adjudication Added a point in the Summary section called Multiple Paths to Add Activities Key Data Element will be the Unique Identifier provided by the user Flow diagrams have been updated based on changes per this document Notional screens have been updated based on changes per this document Users will be able to modify the Review Period Start and End Dates Removed Received Date, Deviations, Violations, Certification Complete, Number of Deviations, and Excess Emissions from the TV ACC Status section Added Facility Reported Status to the TV ACC Status section Removed Reviewer Address, City, State, Zip Code, Phone, and Organization from the TV ACC Review Information Added Received Date, Deviations, Deviations with Excess Emissions to the TV ACC Review Information section Added Contacts and Addresses section Added the ability to link TV ACC to Alleged Violations Added the ability to link TV ACC to Information Requests under Compliance Monitoring Activities Updated Functional Requirements, Data Requirements, and Business Requirements per the EPA Comments Adjudication Meeting changes Updated Use Case Flow Diagrams to include a Key Data Element box and per the comments provided in this document, refer to the individual comments indicated below. List to Link button is renamed to List More Eligible to Link

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
1	Overall	Lead Agency information should be generated as much as possible, however, it is listed as a required element in Figure 1.0-3, and to add a new TVACC. Isn't there a way to generate this information from the Description of the TVACC activity?	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
2	Overall	The main issues from this module that need more discussion are Permit ID, linking, and deleting.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
3	1.0 Title V Annual Compliance Certifications	1st sent.- change at facilities to on facilities	Michelle Torreano	EPA, OECA, OC	3/9/2012	
4	1.0 Title V Annual Compliance Certifications	TVACCs are sent to the EPA Regional Office and the Delegated Agency, not EPA HQ. The term "administratively continued permit" is not used by the CAA.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
5	1.0.1 Summary of TV ACCs Modernization in ICIS-AFS	1. AFS doesn't have a "parent" - "child" relationship to this data. The actions are added as they occur. AFS doesn't require the Permit # or Review Period. These are new fields. The Region enters the Due Date based on data the district provided. 2. The Region enters the Received Date. 3. AFS doesn't require the Reviewer name. This is a new field and should be optional. States/locals enter the Review Date. Permit Data: Permit ID and Facility ID are different. Permit ID is not an MDR. The group asked for a separate discussion group to address this item. We are currently using the CDS ID as the 10 digit Facility ID. Capture Multiple Review Statuses and Reviewers: These are new fields and should be optional. Entering reviewer name and contact information increases burden. TV ACC Results: The "Results" code used for Title V ACC reviews in AFS has different interpretations. The ACC may include a violation that occurred during the ACC period. In many cases the facility is back in compliance and the penalties have been paid, so the violation has been addressed and resolved. If the violation is entered into AFS again, it would be a duplicate. The earlier AFS Modernization Workgroup decided that an ACC would be considered in compliance unless a new violation was found during the review. Certification Complete: The Review Date in AFS has been used to indicate that the review is complete and that the facility is in compliance (MC) unless a new violation has been found during the review (MV). Separate reviews were not entered in AFS because only one action was entered when the review was complete.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		<u>Linking</u>: This needs to be optional. Some agencies may have a reason to link actions to ACC reviews but the only reason I can think of using linking here would be if there was a violation.				
6	1.0.1 Summary of TV ACCs Modernization in ICIS-AFS	As Batch User this will require additional programing on NC's part to include the Deviation and the Reviewer in the AFS export file. **Entering the reviewers First and Last Name, Phone and Address should be optional and not listed on the screen. Entering the number of deviations per violation will be an optional add in for NC.**	Bernard McKee	NC	3/8/2012	
7	1.0.1 Summary of TV ACCs Modernization in ICIS-AFS	Capture Mult. Review Status- I think the term 'reviewed status' should be changed to "review findings" or something similar. The current term used is confusing. It sounds like we're saying they can enter what stage a person is in of the review process- started reviewing the permit, finished reading the permit, etc. I'm not clear on the difference between 'review status' and 'TVACC results.' Can this be clarified? Cert. complete, 1st sent.- change was to is, add certification review after ACC, and has to have.	Michelle Torreano	EPA, OECA, OC	3/9/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
8	1.0.1 Summary of TV ACCs Modernization in ICIS-AFS	Received Date is optional information and at this time will not be required. It was not indicated as required in the SRS. Additionally, there is only ONE TVACC per permit, per review period. There is no need to complicate the record with a "Parent" and "Child" record. There are not multiple reviewers for a TVACC other than Agency and EPA reviewers. There should be an Agency review for all TV permits each year during the life of the permit, EPA is not required to review the TVACC. The term "Violation Exist" needs to be corrected to "Violations Found". There is no need for a certification complete flag, and this is extraneous information. Please remove it. TVACCs can be used as a Discovery Action for HPVs. This type of information has been missing in other modules, but the linkage of this action to a Day Zero pathway as definition and is an MDR. Please add this information to the document.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
9	1.0.1 Summary of TV ACCs Modernization in ICIS-AFS	During the call, it was indicated that having a "child record" for the TV ACC review was not required. The language in this section makes it seem like it is required.	Christy Monk	AL	3/9/2012	
10	1.0.2 TV ACCs Functional Requirements	The earlier AFS Modernization Workgroup decided that an ACC would be considered in compliance unless a new violation was found during the review.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
11	1.0.2 TV ACCs Functional Requirements	Virginia does not assign a unique permit identifier for Title V permits. In AFS we use a combination of regional office acronym and state registration number for all T5 permits of a facility. It is not clear from the requirements whether or not the id has to be unique.	Deborah White	VA	3/8/2012	
12	Table 1.0.-1 ICIS-AFS TV ACCs Functional Requirements	4-7: The Review Date Achieved is mandatory for a TVACC. Child TV ACC Record data is extraneous and should be deleted. 4-14-4-21: Linkage of these activities to other activities is confusing. How will they be retrieved? The data is useless unless it is retrievable. 4-22 should be deleted.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
13	Table 1.0.-1 ICIS-AFS TV ACCs Functional Requirements	Page 6-3, 4-7 Permit ID: This field is new and should be optional. The users requested a discussion group on Facility ID vs. Permit ID. It seems this field would be used by facilities that have more than one Title V Permit. Review Period Start is listed as an MDR. This is a new field and should be optional. Is the Review Period for the period of time included in the report? Or, is it the time that it takes to review the report? The field that would help is one that indicates the Federal Fiscal Year that the report belongs to. That way if 2 ACC reviews are completed in the same year, you can indicate which year each report was for. There are MDR fields in this list that aren't marked, such as Due Date, Received Date, and Review Date Achieved. Review Date Achieved is the date the review is complete. The Child records don't seem relevant unless someone wants to track their reviews internally.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
14	1.0.3 TV ACCs Data Requirements	Batch: Must be valid date in **yyyy-mm-dd format. Now the format is yy-mm-dd. 2 digit or 4 year? However , the dates displayed in the ICIS-AFS screens are MM-DD-YYYY format.**	Bernard McKee	NC	3/8/2012	
15	Table 1.0-2 ICIS-AFS TV ACCs Data Requirements	1: Do not understand what a Foreign Key of Linked Facility is. Please provide more information about this. 3: Due Date is not an Agency MDR. 6: Is there a way to build in the Lead with the TVACC description? It would advantageous to provide Agency or EPA Review to negate extra data entry. 7: Received Date is not an Agency MDR. 13: Should state Violation Found. 17: Not needed. 14.NO- The Receive Date is not an Agency MDR. 18: NO, Deviations are not an Agency MDR. 19-22. Not sure that there will be a Parent and Child record. 23: Do not need Certification Complete. 24. Editting should be allowed in case mistakes are made during data entry.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
16	Table 1.0-2 ICIS-AFS TV ACCs Data Requirements	Page 6-5 1. What is the Foreign Key of Linked Facility? This term has been used before. 2. Permit ID is a topic that needs discussion. Page 6-6 17. Certification Complete: The "Review Date Achieved" is used to report the date that the review was complete. Is this field asking if the ACC was complete when it was submitted? If so, this is a new field. 27. Reviewer Agency can use the user profile as the default. 28. Review Status: This appears to be equivalent to the AFS Results Code. Page 6-7 30. thru 39. are for the Reviewer. These are new fields and need to be optional.	Chris Cote	Ventura County, CA	3/8/2012	
17	Table 1.0-2 ICIS-AFS TV ACCs Data Requirements	Alabama needs PERMIT ID to have at least 12 characters and to allow the use of hyphens or an underscore. Also I am adamantly opposed to using a date ("Review Period End Date") as a key identifier. It would make it impossible to correct a date via batch mode and possibly through direct entry.	Christy Monk	AL	3/9/2012	
18	Table 1.0-3	14.NO- The Receive Date is not an Agency MDR. 18: NO, Deviations are not an Agency	Betsy	EPA, OECA,	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
	ICIS-AFS TV ACCs Business Rule Requirements	MDR. 19-22. Not sure that there will be a Parent and Child record. 23: Do not need Certification Complete. 24. Editing should be allowed in case mistakes are made during data entry.	Metcalf	OC		
19	Table 1.0-3 ICIS-AFS TV ACCs Business Rule Requirements	9 & 10, you may want to say later than in stead of greater than since it's a date. 15 and 18 seem to contradict one another. I think it should be if Review Date Achieved in entered the system shall require the user to enter Violations or Deviations.	Michelle Torreano	EPA, OECA, OC	3/9/2012	
20	Table 1.0-3 ICIS-AFS TV ACCs Business Rule Requirements	Page 6-8 2. The system allows Multiple ACC records for a Facility and Permit Combination. Is this for Facilities that have multiple Title V permits? 3. thru 7. Discusses Permit ID. This term needs to be defined. 14. Received Date will be required. The Region has been entering the Received Date. 15. "The system shall require the user to enter Violations if Review Date Achieved is entered." This makes it sound like reporting violations is required but there may not be any violations to report. It sounds like this needs a logic field like "Violations discovered" Yes/No. 16. "The system shall require the user to enter Review Date Achieved if Violations is entered." The Review Date and Violations are not dependent on each other. 17. "The system shall require the user to enter Review Date Achieved if Deviations is entered." The Review Date and Deviations are not dependent on each other. 18. "The system shall require the user to enter Deviations if Review Date Achieved is entered." There may not be any deviations to report. It sounds like this needs a logic field like "Deviations discovered" Yes/No. 23. The Region has been entering the some of this data like Due Date and Received Date. However, the Region 9 staff has dropped from three people to one. Will the Region have the resources to continue entering the Title V ACC actions? Will the Region be getting more resources? 24. The system shall not allow Title V ACC fields to be edited once the record is saved. What if we find typos during a review? It sounds like we won't be able to correct them. 25. thru 28. It makes sense that if you want to link to records that they are in the system. But, I question the need for all this linking.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
21	1.0.5 Add TV ACCs	It looks like the system must have permit records in order to add a TV ACC, but I thought I heard that permit records were optional. Is this correct?	Deborah White	VA	3/8/2012	
22	1.0.5 Add TV ACCs	Key Data Elements: We need more discussion on Permit ID. It needs to optional. Review Period Start and End Dates: Is this the period of the ACC Report? Or, the review of the report? "Users must proved the Permit ID. . ." It seems that there's an idea of what Permit ID is and how it could be used. Permit ID doesn't exist in the form that is being described in the modules. Maybe if this is discussed, we could find something that would work.	Chris Cote	Ventura County, CA	3/8/2012	
23	1.0.5 Add TV ACCs	NC will have to add the current NC Permit ID to the batch export file to AFS. Nc may opt to the cumputer generated permit ID numbering system.	Bernard McKee	NC	3/8/2012	
24	1.0.5 Add TV ACCs	There is no discussion in the data flow from associated records in the Permit module. The SRS requested that if the user provides TV permit information with the required due dates, then the system would automatically provide this information to the user if TVACC data entry were selected. Then the user could select the appropriate date range and add information.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
25	Figure 1.0-1 Use Case: Add TV ACCs-Batch	I do not understand what is meant by "Validate Key Data Elements" and "Validate Non-Key Data Elements". Schema validation is performed on key and most non-key elements at CDX before the XML arrives at ICIS so all that is left to do is validate the data against the ICIS Batch business rules. What is being done here that I am not realizing? Also, please change all occurrences throughout this and future documentation of "Write to Audit Trail Table" to "Write to Audit Table" because we do not call it an "Audit Trail" table in the ICIS Batch world.	Alison Kittle	EPA, OECA, OC	3/5/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
26	Figure 1.0-1 Use Case: Add TV ACCs-Batch	Should the user get a confirmation that data was saved like in web?	Michelle Torreano	EPA, OECA, OC	3/9/2012	
27	Figure 1.0-2 Use Case: Add TV ACCs-Web	1. Diagram should start with "User selects Facility". 2. "User chooses to add TV ACC" should be second because on-line users will want to add multiple actions at one time. ICIS-AFS Validates Non-Key Data Elements: What are the Non-Key data elements? Verify if Permit ID exists: This Permit ID linking idea is another reason to discuss/clarify the Permit ID function.	Chris Cote	Ventura County, CA	3/8/2012	
28	Figure 1.0-2 Use Case: Add TV ACCs-Web	Is there any reason the wording is a bit different in these boxes compared to batch? If not, you should use consistent wording because it's easier to identify the difference in the processes then.	Michelle Torreano	EPA, OECA, OC	3/9/2012	
29	Figure 1.0-3 Notional Screen: Add TV ACCs	**NC does not want to included reviewers personal information listed in this AFS. Only the Agency's information**	Bernard McKee	NC	3/8/2012	
30	Figure 1.0-3 Notional Screen: Add TV ACCs	Permit ID: This should probably be the Facility ID. We need to clarify this Permit ID concept. Review Period Start/End: Again is this the ACC report period? If so, we could just use a field for the Federal Fiscal Year the report was due. Lead Agency: This could default to the user profile. There could be an option to enter another agency, if necessary.	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
31	Figure 1.0-3 Notional Screen: Add TV ACCs	Review Date Achieved is required for this activity,as well as Violations Found. Currently, Deviations, Due and Received Date are not Agency MDRs.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
32	1.0.6 Edit TV Acc	Edit indicates that Review Period Start Date and Lead Agency cannot be modified. This data should be available for editing in case errors are made when entered. Otherwise the entire record would have to be deleted and reentered if a mistake was made.	Betsy Metcalf	EPA, OECA, OC	3/8/2012	
33	1.0.6 Edit TV Acc	Permit ID: will be discussed. Received Date: required only if Violations, Deviations, or Review Date Achieved is entered. The Received Date is related to the Review Date but not to Violations or Deviations. Review Date Achieved: required only if Violations, Deviations, or Certification Complete is entered. The Review Date Achieved is related to Certification Complete but not to Violations or Deviations. Deviations required only if Review Date Achieved or Certification Complete is entered. Deviation are not dependent on Review Date Achieved or Certification Complete. Review Period Start Date is system generated. Where does is come from?	Chris Cote	Ventura County, CA	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
34	1.0.6 Edit TV Acc	Why are there limitations on editing records?	Deborah White	VA	3/8/2012	
35	Figure 1.0-4 Edit TV ACCs - Batch	I do not understand what is meant by "Validate Key Data Elements" and "Validate Non-Key Data Elements". Schema validation is performed on key and most non-key elements at CDX before the XML arrives at ICIS so all that is left to do is validate the data against the ICIS Batch business rules. What is being done here that I am not realizing? Also, please change all occurrences throughout this and future documentation of "Write to Audit Trail Table" to "Write to Audit Table" because we do not call it an "Audit Trail" table in the ICIS Batch world.	Alison Kittle	EPA, OECA, OC	3/5/2012	
36	Figure 1.0-4 Edit TV ACCs - Batch	User should get a notice if edit rejected.	Michelle Torreano	EPA, OECA, OC	3/9/2012	
37	Figure 1.0-9 Notional Screen: List of Compliance Monitoring Activities for Linking	It would be good to have discussion on linking. Most linking should be optional.	Chris Cote	Ventura County, CA	3/8/2012	
38	Figure 1.0-9 Notional Screen: List of Compliance Monitoring Activities for Linking	The anticipated usage of linked actions is not described in this document. How will this data be retrieved?	Betsy Metcalf	EPA, OECA, OC	3/8/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
39	Figure 1.0-9 Use Case: Delete TV ACCs-Batch	I do not understand what is meant by "Validate Key Data Elements". Schema validation is performed on key and most non-key elements at CDX before the XML arrives at ICIS so all that is left to do is validate the data against the ICIS Batch business rules. What is being done here that I am not realizing? Also, please change all occurrences throughout this and future documentation of "Write to Audit Trail Table" to "Write to Audit Table" because we do not call it an "Audit Trail" table in the ICIS Batch world.	Alison Kittle	EPA, OECA, OC	3/5/2012	
40	1.0.7 Delete TV ACC	It makes sense that when you delete an ACC that the links would be deleted, but I don't know why the attached records would be deleted. It doesn't seem that any of the records that are linked to the ACC would be "child" records. This delete function needs to be discussed more.	Chris Cote	Ventura County, CA	3/8/2012	
41	Figure 1.0-12 Use Case: Delete TV ACC-Batch	If linked records are not found, the arrow should go to delete TV ACC; not delete link(s).	Michelle Torreano	EPA, OECA, OC	3/9/2012	
42	Figure 1.0-14 Notional Screen: TV ACC Search Screen	Answer to BAH question- yes.	Michelle Torreano	EPA, OECA, OC	3/9/2012	

5.2.4   CEM-EERs

Module Being Reviewed	CEM/EER
Name	TIER 3 COMMENTS
Date	5/4/2012
Organization	U.S. EPA/OECA/OC/ETDD
Summary of Changes - 6/13/2012	Summary of Modernized Items section has been updated with how users can access activities. Document has been updated to remove quarterly submission and have "per reporting period" so it's flexible for all Delegated Agencies. Notional Screens have been updated to reflect the comments made in this document Search screen and Search Results screen will be standard screens with common search fields across all Compliance Monitoring Activities Minor errors have been corrected based on the comments made in this document.

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
1	Overall	AK informed us that their EERs are reportable to them within 30 days of the event. We will need to ensure that these documents are incorporated with the correct reporting periods during the design phase of the project.	Nattinee Nipataruedi	AK	5/4/2012	
2	Overall	The final regulations for this information are still being promulgated, as well as the repository in the OAQPS Web Fire database. We are making plans here with the best available information. The assumption is that electronic documents will be available from Web Fire for use in ICIS-AFS.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
3	Overall	It's nearly impossible to create screens for the selection of CEM/EER reports that could be imported from Web Fire. Could BAH please include some discussion on how the user would check to see if this data is available?	Betsy Metcalf	EPA, OECA, OC	5/7/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
4	1.0 Continuous Emissions Monitors/Excess Emissions Reports	This section says that "ICIS-AFS will not calculate any data . . .; alternatively, ICIS-AFS will receive all data, including calculated data, from the repository." What calculated data are they referring to?	Chris Cote	Ventura County, CA	5/4/2012	
5	1.0.1 Summary of CEM and EER Modernization in ICIS-AFS	On the topic of linking, if we find a violation during a CEMS review, a PCE for the CEMS review will be entered in AFS. The PCE will be linked to any related violation actions.	Chris Cote	Ventura County, CA	5/4/2012	
6	1.0.1 Summary of CEM and EER Modernization in ICIS-AFS	This section indicates that linking/unlinking to multiple activities will be possible. As the final requirements for action linkage are still under discussion, it must be clear how activities are linked and how that linkage can be easily reported and retrieved. It is anticipated that only EPA will be using the system for management as the air program, as reporting air agencies use their own systems or programs. Linking keys must be simplified compliance monitoring activities linked to enforcement activities use the same key, so a reporting agency does not have to use multiple keys.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
7	Table 1.0-1 ICIS-AFS CEM and EER Functional Requirements	18-2 Includes the "Emission Point ID". The emission points that were in AIRS were part of the emission inventory data. When the emission inventory group left AIRS, AFS didn't have point data. Where is the Emission Point ID going to come from?	Chris Cote	Ventura County, CA	5/4/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
8	Table 1.0-1 ICIS-AFS CEM and EER Functional Requirements	18-2 also Includes a number of mandatory fields to be collected for CEMS reviews. If companies are expected to submit this data, it will be important to develop a standard method or format for companies to use to submit the data. For example, we have requirements for certain facilities to submit data. By developing a standard form for people to use, it makes the job easier for the companies because they understand what is required. The standard forms also make it easier for the district to collect and interpret the data. Before we developed the forms, every company was left to develop their own method and the data was often incomplete or difficult to interpret. The new form makes the process more efficient for the companies and the district.	Chris Cote	Ventura County, CA	5/4/2012	
9	Table 1.0-1 ICIS-AFS CEM and EER Functional Requirements	18-6 This section identifies a number of fields as mandatory. If EPA intends to require data for all of these mandatory fields, there will need to be an outreach plan to train industry on the reporting requirements. It will also take clearly developed data entry methods, such as a form or input screen to collect the desired data. If this data is going to be collected, the goal should be to make the process as straightforward and efficient as possible.	Chris Cote	Ventura County, CA	5/4/2012	
10	Table 1.0-1 ICIS-AFS CEM and EER Functional Requirements	ID18-9: Should read '..if error have occurred.."	Betsy Metcalf	EPA, OECA, OC	5/7/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
11	Table 1.0-1 ICIS-AFS CEM and EER Functional Requirements	Please add Total Duration of Excess Emissions % and Total CEMS Downtime %.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
12	Table 1.0-1 ICIS-AFS CEM and EER Functional Requirements	ID 18-12-18-18: Please refer to my comment 3. Also, there is no ID 18-17. Additionally, Applicable Air Programs for these documents use a completely different table than ICIS-AFS uses for facility air programs. We will need to rename this field for clarity sake during design.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
13	Table 1.0-2 ICIS-AFS CEM and EER Data Requirements	All fields in design will need to be re-evaluated to regulations and requirements.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
14	Table 1.0-3 ICIS-AFS CEM and EER Business Rule Requirements	ID3: We should add the Reporting Period to this business rule. IDs 9-11 are subject to the same outcome of action linkage as in functional requirements.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
15	1.0.6 View EER Data	This section should indicate that CEM records are also read-only, and no ability to add, edit or delete will be provided.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
16	Figure 1.0-2 Notional Screen: View EER Data	This screen should indicate units of measure to Total Operating Time.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
17	Figure 1.0-4 Notional Screen: Related Compliance Monitoring Activities	Screen does not show the user what is the key that links these activities together. Batch users cannot use this linkage nor can it be replicated in a retrieval. Please explain what fields would be used to list all linked activities at a facility.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
18	Figure 1.0-5 Notional Screen: List of Compliance Monitoring Activities for Linking	Screen does not show the user what is the key that links these activities together. Batch users cannot use this linkage nor can it be replicated in a retrieval. Please explain what fields would be used to list all linked activities at a facility.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
19	Figure 1.0-6 Notional Screen: Related Enforcement Actions	Screen does not show the user what is the key that links these activities together. Batch users cannot use this linkage nor can it be replicated in a retrieval. Please explain what fields would be used to list all linked activities at a facility.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
20	Figure 1.0-7 Notional Screen: List of Enforcement Actions for Linking	Screen does not show the user what is the key that links these activities together. Batch users cannot use this linkage nor can it be replicated in a retrieval. Please explain what fields would be used to list all linked activities at a facility.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
21	Figure 1.0-8 Notional Screen: Related Alleged Violations	This screen should provide the key for these violations.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
22	Figure 1.0-9 Notional Screen: List of Alleged Violations for Linking	This screen should provide the key for these violations.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
23	Figure 1.0-10 Notional Screen: Search CEM and EER	Events on this screen should include ALL. Search should be possible on Total Duration of Excess Emissions and Total CEMS Downtime PERCENTAGE as well as Operating Time. Time should estimated in HOURS for simplicity.	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
24	REPORTS DESIRED	Facilities with CEM/EER activity by timeframe	Betsy Metcalf	EPA, OECA, OC	5/7/2012	
25		Facilities with EER Total Duration of Excess Emissions and Total CEMS Downtime by Percentage	Betsy Metcalf	EPA, OECA, OC	5/7/2012	

5.3 ENFORCEMENT ACTIONS

Module Being Reviewed	ENFORCEMENT ACTIONS, ACTION LINKAGE
Name	TIER 3 COMMENTS
Date	3/14/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
1	Overall	Overall - Part 1	One factor that hasn't been considered is that the structure of an agency affects whether data will be available to enter into AFS. Some agencies split compliance (inspections) from the legal settlement of enforcement actions. Source test actions may also be handled by a separate group. Data may be kept in different data systems and be owned by different groups within an agency. The consequences of this are: 1. A primary AFS user may not have access to the data that AFS is asking for. 2. If an agency has multiple AFS users, they may not be able to communicate because the data is in different systems. 3. These factors can limit the data that is available for entry into AFS or ICIS-AFS. 4. The data submitted to AFS may not accurately represent an agency's compliance/enforcement program.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
2		Overall - Part 2	A related issue is that ICIS-AFS contains more mandatory fields. If the states/locals don't have data for the required fields, agencies have a dilemma. The options are: 1. Choose an option that is the closest to what they actually do. This may not reflect the actual action type. 2. Request that an action type be added. For example, add an Air Program for "Enforcement of State/Local Rule". 3. If an action type can't be added to the system, the final option is to not enter data. Option 2 seems like the best option because it allows States/Locals to enter data and reflect what they do. The ideal situation would be to develop a program and system that allows EPA to do oversight of the state/locals and allows state/locals to enter data in a way that reflects their programs. That is a worthwhile goal and we are willing to help develop such a program.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
3	Overall	Overall	As a Batch AFS user, I hope that when exporting the data from our system to the modernized AFS will be linked automatically to the proposed screens and AVF files easily and without much reprogramming of our system. Most everything data point that is being proposed in the modernized AFS is available in our system.	Bernard McKee	NC DAQ	5/30/3012
4	2	Why this Tier 3 meeting is different from other Tier 3 meetings	**(NOTE: several of the boxes and their titles do not correspond to the copy if the power point presentation we have. Differences have been highlighted in red and the boxes renumbered)**	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
5	3	Assumptions/Constraints	San Diego County APCD appreciates the opportunity to participate and comment in the modernization process for AFS. There is a real need for modernization of AFS but not as a means for the expansion of data that results in an increased drain on agency resources. Streamlining and simplification should be the order. The proposed design is unnecessarily complicated, burdensome and neither simplifies nor streamlines data collection and reporting. The assumption that "Designated Agencies" and EPA must share operational data" is an invalid assumption. We do not use EPA data and most of our "operational data" does not belong in an EPA database. Such data entry as proposed should be changed to "may share" (optional). It is important for EPA to recognize that many state or local agencies do not maintain EPA's required data, as they do not track activities by EPA programs. Such data does not benefit our operation, as we and many others do not regulate like EPA. For state and local agencies to gather, enter, and maintain EPA's data for EPA's use would be burdensome, and detract from our actual mission improve air quality. It is difficult to conceptualize the workings of the proposed system without seeing it in action. We re-state our previous assertion that we need to beta test EPAs proposed new information system to gain a better understanding and provide more meaningful comments.	Greg Gjerde	SDAPCD	
6	4	The Business Process in the "Real World"	Agree	Bernard McKee	NC DAQ	5/30/2012

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
7	4	The Business Process in the "Real World"	A major EPA assumption is that state and local agencies regulate, inspect, collect data, and enforce federal law as EPA does. We do not gather or store data by air program, pollutant or subparts. Many of the state and local agencies have been telling EPA this for years. We do not have discrete functions such as "determination of an alleged violation", then "notify the facility". We do many of these functions as one action resulting in efficient inspection and enforcement processes. We must deal with these data collection differences as true partners and find a way to provide EPA valuable information and not impact local agencies. For example, agencies need alternative choices in drop down menus when we don't have a pollutant, air program or subpart. Additionally, when an agency has no information to enter the entry field should be hidden or at least default to a value that requires no agency entry. We do not have the same enforcement tools as EPA nor should our compliance and enforcement actions be characterized in EPA terminology. For example, we don't have "administrative orders" or "consent decrees" nor a true functional equivalent. Our Notices of Violation (NOV) usually in the end have penalties associated with them unlike EPA's NOV. Our compliance and enforcement actions should not be expressed in EPA terms that do not fit but in terms we utilize. Using EPA terminology creates confusion and misrepresents data to the public. Much of the data becomes meaningless and misrepresents reality when it is mischaracterized. We need our own choices and flexibility to meet our needs. AFS as a data model has not worked well for us over the years. Instead of working with us to design a meaningful and useful system for all, EPA chose to take the AFS data model and form it like the ICIS water model. It is not a good fit. Recommendations of the previous AFS modernization workgroup were ignored. One of the major recommendations of the workgroup was not to use ISCS for air data. EPA chose to ignore the real users. We had expressed our concerns many months ago prior to the ICR being approved by the OMB. We have a question for EPA to answer. Did you share our previous concerns and comments with OMB? Rather than EPA trying to shape agencies information collection processes to meet their needs, EPA should find ways to incorporate agencies existing available data and shape it into a usable form. This way, only EPA needs to make changes to data collection rather than dozens of agencies who can ill afford the cost and resources.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
8	4	The Business Process in the "Real World" Part 1	The basic business process in Ventura County (and probably other California Districts) is: 1. Violations are found during an inspection. 2. The inspector writes a Notice of Violation during the inspection 95+ percent of the time. 3. The NOV gives the facility 2 weeks to fix the problem. 4. A follow-up action confirms the facility is back in compliance. 5. After the facility is back in compliance, the district sends the facility a mutual settlement letter. The facility has 2 weeks to pay the penalty. 6. The facility pays the penalty. Here are more details: 1. Most inspections are on-site inspections. These could be annual inspections, complaints, breakdowns, CEMS reviews, etc. 2. NOV's are issued for violations that will require a penalty. Notices to Comply are written for minor violations that will not require a penalty. NOV's and NTC's are are uniquely numbered and are tracked individually in the district's data system. If an inspector cannot determine compliance during the inspection, they will ask for records/info to be provided. If the inspector finds a violation while reviewing the supplemental data, the inspector will issue an NOV. 3. Companies can request an extension if they need more than 2 weeks to fix a problem. This is negotiated. 4. There is always a follow-up action by the district to determine compliance. This could be an on-site inspection or verification that a permit application or report has been submitted. The follow up action is documented in the district data system.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
9	4-Part 2	The Business Process in the "Real World" Part 2	5. The Mutual Settlement Program was developed by the California State Legislature and the statutes are written in the California Health & Safety Code. 99+ percent of violations are handled by mutual settlement. Only 11 cases have gone to court since 2000. 6. The district may negotiate the settlement amount proposed in the mutual settlement letter. The final penalty paid is documented in the district's data system. The NOV's are published in the district's monthly newsletter which is mailed to all permit holders and interested parties. The newsletter is also posted on the district's website. The newsletter also contains the number of inspections and penalties collected during that month. EPA has considered district NOV's to be informal enforcement actions and the mutual settlement letters to be formal enforcement actions. EPA considers the mutual settlement letters to be functionally equivalent to an administrative order. It would be more accurate to add an enforcement type like "NOV settled with penalty" or "Mutual Settlement Program" for these actions. Legacy AFS has a regional action type for mutual settlement that maps to an EPA national action type.	Chris Cote	Ventura County APCD	
10	5	Legacy AFS Supports the Process By:	See discussion of linkage and discrete functions above. On the second call, Jason Swift responded to our question on collapsing the function listed on this screen. They are not separate activities in our agency nor are they in our data.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
11	5	Legacy AFS Supports the Process by:	Legacy AFS Approach: Something happens-yes. Item 1 - Compliance activities happen. Some are entered into AFS. What does the following statement mean? "If discrepancies are found, may be entered as deficiencies, pollutants over limits, EERs, etc." Please explain. Items 2 and 3. The Date of Discovery, the date the violation is determined (Day Zero), and the date the NOV is issued are usually the same date. The Day Zero is added to AFS. The action that found the violation (Date of Discovery) may be in AFS or it may have to be added to AFS after the "Day Zero" is entered. Note: In agencies where compliance and legal settlement departments are separate, the legal group may add the Day Zero, Addressing, and Resolving actions, but they may not have the inspection/date of discovery info to add to AFS. Item 4 - Addressing Action: After the facility is determined to be back in compliance, a mutual settlement letter can be sent. The letter contains a proposed penalty so the letter is the addressing action. Item 5 - The Resolving Action/date is the date the penalty is paid.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
12	6	ICIS-AFS Approach	The concept of linkage comes from old AFS. It hasn't worked for us in AFS and should not be assumed workable in ICIS either. Internally in our agency actions are not linked. There is no need to link them to report data. The simplest linkage should be done automatically through the data keys in the system. If you already are in a facility in the system and enter an action it should be linked to the facility by default. That is as far as this concept of linkage needs to go. Linking to a source discovery activity is unnecessary and burdensome. These functions are done independently in our agency and many others. Different people enter different data and do not necessarily have access to each others data. We keep hearing that PCE's are reportable. We have had that discussion before and that is just not doable, burdensome and is not necessary. All federally reportable violations came up again recently s well. Anything more than only reporting HPVs is still unacceptable. The HPV designation must also be greatly simplified and sensible.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
13	6 - Pt 1	ICIS-AFS Approach Part 1	Item 1 - Compliance activities happen. Items 2 and 3 - The inspector determines there is a violation and issues an NOV. A file is created for the NOV. Is this what file what the AVF is referring to? Each NOV is tracked separately in the district database. There are 3 scenarios for violations: a. Most violations consist of one NOV issued to one facility. b. If a facility is issued multiple NOV's at the same time, the violations may be settled together. A settlement amount is assigned to each violation and tracked by NOV number. c. If multiple facilities owned by the same company are issued NOV's at the same time for related reasons, the violations might be settled together but settlement amounts would be applied to each NOV number. Item 4 - Addressing Action: A mutual settlement letter is sent with a proposed penalty. Item 5 - The Resolving Action/date is the date the penalty is paid.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
14	6 - Pt 2	ICIS-AFS Approach Part 2	It appears ICIS-AFS is proposing this data flow: a. Create AVF instead of Day Zero b. Link Discovery - i.e. something happened c. Issue NOV - as the date you notified the facility d. Addressing action: Send settlement Letter e. Resolving action: the penalty is paid The only non-enforcement resolution to an NOV is that we decide the NOV was issued in error. In this case the NOV is void and all records are deleted from the database because the NOV shouldn't have been issued in the first place. The voided NOV is kept for audit purposes.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
15	7-Part 1	Comparison of Approaches Part 1	Legacy AFS Approach Item 1- Under Something Happens - What do you mean by "Discovery actions all entered as actions with general fields for indicating potential deficiencies"? Are you referring to the Results Code? In our process: 1. If a Discovery action is already in AFS, the action can be linked to the Day Zero. 2. If a Discovery action that relates to a Day Zero is not in AFS, the action will be added to AFS so it can be linked to link to a Day Zero. Item 2 (violation determined) and Item 3 (notify facility) are combined in our process. The inspector determines there is a violation and issues an NOV during the inspection. This is the case most common scenario. Item 2 question: Does violation type here refer to HPV or FRV? Item 3. This section states that NOV's are not enforcement sensitive. District Counsel has advised the district that data on active cases cannot be made available to the public. Once violations are settled, data can be made available to the public. Data on violations may not be added to AFS until the cases are settled. Item 4. When the violation has been corrected, the district sends the facility a mutual settlement letter. The facility has 2 weeks to pay. Item 5. The facility pays the penalty.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
16	7-Part 2	Comparison of Approaches Part 2	Other: Day Zero/AVF should be enforcement sensitive because that is the date that a violation is determined. AFS uses the milestone dates but we don't. Discovery Date, Day Zero, and NOV are usually the same date. Case Consultation - we don't use this. Addressed/Resolved are discussed above. ICIS-AFS Approach Item 1. Something Happens - What do you mean by "Discovery actions entered with data specific to action type and optional defined fields for indicating potential deficiencies"? Please explain. Item 2. AVF violation types and pollutants. We need a value for administrative violations. Item 3. We currently link the NOV issue actions to the Day Zero. Item 4. The settlement letter is sent and the payment is received. These are 2 actions. If they can be reported on one screen, that will be an improvement. I can't see that we would use a close-out action. We are only planning to report actual violations to AFS. Item 5. a. As soon as you link a Day Zero or AVF to a Date of Discovery, you have made the violation non-enforcement sensitive. NOV actions are not enforcement sensitive in AFS. Therefore, NOV data cannot be entered in AFS until the violations are settled. b. "Critical milestones based on activities - timeliness not system-generated." We have always reported activities so that will be the same.	Chris Cote	Ventura County APCD	
17	7	Comparison of Approaches	Very Good comparison of Approaches Chart	Bernard McKee	NC DAQ	5/30/2012

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
18	9	Alleged Violation File Assumptions/Constraints	Another concern is the undefined term "alleged violation file". From a legal perspective, all violations are alleged until proven in court and a judgment rendered. We agencies are not going to report "all" alleged violations into any EPA data system. Is it actually necessary to create a new category or data point using this term? We agree with the idea of eliminating the useless "day zero", but please, in an effort of simplification, do not replace it with something else that is also unnecessary. That is not simplification. We don't need more data, fields and screens; we need fewer. More data does not mean better data.	Greg Gjerde	SDAPCD	
19	9	Alleged Violation File Assumptions/Constraints	Item 1 says ICIS-AFS will not track individual violations. Our system tracks violations at the individual level. If multiple violations are issued at the same time, they may be entered into AFS as a group, but are tracked separately in our system. What do you mean by "Violations will be tracked by type and actioned together"? What are violation types? What is "actioned together"? Please explain this. Item 2. Keeping non-FRV's optional is the best way. Most FRV's should also be optional. Item 3. Isn't Day Zero being replaced by AVF? Both of these are based on the date the NOV is issued. Item 4. The workgroup will create a list of violation types. What are some sample violation types?	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
20	10	Alleged Violations File Modernization items	AVF overall policy indicator This is policy indicator field is not needed. Policies are only EPA guidance and not the law. Few data points , if any, in AFS should be auto-generated or based on any assumptions. Assumptions make bad data. Entry of Pollutants. Pollutants should not be mandatory nor system required fields. There needs to be an alternative choice for agencies that do not have this data and do not regulate by pollutant, air program or subpart. If these fields are "mandatory" EPA will either get bad data as it does now when someone is forced to guess or just use a common data element or no data at all since the records cannot be saved if the "mandatory" field is not populated. I don't think either choice is what EPA really wants.	Greg Gjerde	SDAPCD	
21	11	Alleged Violation File Notional Screen: Delegated Agency - Add (top)	Remove the "National Initiatives" from this screen (and other screens used by state and local agencies), since they do not apply to delegated agencies and are meaningless to us. Pease, keep the screens uncluttered as much as possible.	Greg Gjerde	SDAPCD	
22	11	Alleged Violation File Notional Screen: Delegated Agency - Add (top)	What is the "Policy Indicator"? What are the Start and End dates?	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
23	12	Alleged Violation File Notional Screen: Delegated Agency - Add (bottom)	Under "Via Linked Activity", if actions are already linked to this AVF, will they appear here? What is the "Non-Enforcement Resolution"? Is this a place for a comment? It appears that you would click on "Add New" to bring up a screen that would allow you to add the next action, rather than entering the data on a line item like Legacy AFS does now.	Chris Cote	Ventura County APCD	
24	13	Alleged Violation File Notional Screen: Delegated Agency - Edit (top)	Will "Applicable Air Programs" include the standard air programs from AFS? It would help to have Air Programs for Title V, SIP, and State/Local Rule Enforcement.	Chris Cote	Ventura County APCD	
25	13	Alleged Violation File Notional Screen: Delegated Agency - Edit (top)	Please remove "policy indicator" and "national initiatives" as discussed above.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
26	14	Alleged Violation File Notional Screen: Delegated Agency - Edit **(bottom)**	All linking must be and remain optional. Agency data entry and reporting duties are divided by function. For instances, the person entering inspection data is different from the person entering HPVs. There may be no information in the system to link to and it is not linked or tracked in our database. We will continue to have difficulty with linkage.	Greg Gjerde	SDAPCD	
27	15	Alleged Violation File Outstanding Issues	Item 1. Are "Formal" NOV's going to be NOV's that are settled with a penalty? Item 2. The question is whether to use a flag to indicate the level of the worst non-resolved HPV? Or did you mean violation? This question implies that all violations will have linked resolving actions. From what I understand some regions/agencies have issues with linking resolving actions to violations. If violations don't have linked resolving actions, the following will happen: a. The system won't be able to tell which violations have been resolved. b. Once a violation is entered in ICIS-AFS, the facility will always appear to have an unresolved violation. c. The flags won't reflect the actual status of the facility. It seems the system is trying to use the flag like "Compliance Status". The idea is okay but the flags may not be very accurate.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
28	15	Alleged Violation File Outstanding Issues	There needs to be an intermediate level between formal and informal enforcement actions. This hybrid would be a better fit our Notices of Violation that are HPVs settled through an administrative mutual settlement process. In this process, letters are sent offering a settlement short of litigation. These are not technically "assessed" penalties, but offers to settle which are confidential and inadmissible under California law. This is why we report the actual collected penalty. That collected penalty should be the MDR, since your focus should be on results not process. "Notice" and "compliance determination" should not be separate required fields. These are not discrete functions in our agency. The compliance determination and notice are done during the inspection process. Actual air enforcement litigation is much less frequent in California.	Greg Gjerde	SDAPCD	
29	17	Alleged Violation File Outstanding Issues	EPA has proposed making formal NOVs into formal Enforcement Actions so that pollutants and violation types can be entered against them. **NC's system links all NOV initiating action types to the pollutant and program that is in violation**	Bernard McKee	NC DAQ	
30	17	Enforcement Action Assumptions/Constraints	We need flexibility to use our terminology and process steps which differ from EPA's. We do not have consent decrees, administrative orders or final orders and must have meaningful choice that will also be reflected on the web through ECHO or other systems is not converted to EPA terminology.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
31	17	Enforcement Action Assumptions/Constraints	Item 1. The Delegated Agency screens may be streamlined from FE&C screens but they aren't streamlined from Legacy AFS, which is what we were looking forward to. Item 3. Please explain the combined initiation and final order structure and the statement that states/locals will not be able to enter multiple final orders against one enforcement action. Isn't a AVF supposed to cover multiple violations at a facility or multiple violations at multiple facilities? Wouldn't the multiple resolving actions be linked to the original AVF?	Chris Cote	Ventura County APCD	
32	18	Enforcement Action Modernization Items	Item 1. Point 1. The ICIS-AFS structure seems to be way more complex than it needs to be. The changes in terminology make the system seem more confusing. It might help to keep some of the AFS terminology. The main goal for AFS modernization was to make the system streamlined and easier to use. Unfortunately, that doesn't seem to be the case with ICIS-AFS. Point 2. This says there are different structures/data elements collected for formal and informal EAs. Is this referring to differences between Legacy AFS and ICIS-AFS or differences within ICIS-AFS? Point 3. Please explain how ICIS uses a single EA with attributes. Item 3. Please explain how ICIS-AFS will allow entry of multiple facilities on a single EA.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
33	18	Enforcement Action Modernization items	More consideration needs to be given to local agency business processes, needs, and practices.	Greg Gjerde	SDAPCD	
34	19	Enforcement Action Notional Screen: Delegated Agency Informal (top)	On the last call, there was a question about whether the following fields were useful: Agency Lead Indicator: Enforcement Agency Type: Enforcement Agency Name: It seems that these fields could be populated from a user's ID as a default. And, the system could allow the fields to be over written, when necessary. Maybe there could be pick lists by state and/or region. The pick lists could make it easier for the state/region users who enter data for more than one agency. Under "Linked Facilities" it appears that "Identifier" is used to find the facility that you want to link to. It seems that a user could select a CDS ID or and FRS ID. How will the system know the type of identifier that a user entered? Will the system recognize the ID by its format? Or, would an Identifier type have to be used?	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
35	20	Enforcement Action Notional Screen: Delegated Agency Informal (Bottom)	The "Cross Media Indicators" has field for federal activity and comment. These fields seem to be for EPA only. For the most part, I wouldn't use the comment fields. But, I would like one small comment field to leave a note for things like the equipment tested or the FFY of the action. I currently use the RD16 in AFS for this purpose.	Chris Cote	Ventura County APCD	
36	21	Enforcement Action Notional Screen: Delegated Agency Formal (top)	Please use more general terminology other than "Final Order" which implies a court order. We do not have enforcement orders or consent decrees. We need general categories that fit what we do.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
37	21	Enforcement Action Notional Screen: Delegated Agency Formal (top) - Part 1	Some of these comments will be the same as on Page 19. Under Linked Facilities: It appears that "Identifier" is used to find the facility that you want to link to. It seems that a user could select a CDS ID or and FRS ID. How will the system know the type of identifier that a user entered? Will an Identifier type be required? The next section for facility shows the ID as either FRS or CDS. Under the facility info is a section on Enforcement. During the last call there was a comment that the "Enforcement Action Type" and "Final Order Type" could be combined. That could work if the action type is "order type issued". The following 3 fields were also used on the Informal Action screen: Agency Lead Indicator: Enforcement Agency Type: Enforcement Agency Name: It seems that the agency type and name could be populated from a user's ID as a default. The system could allow the fields to be over written, when necessary. It would help to have a pick list by state or region for users who would need to over write the fields. For example, it would probably help a Region to have a pick list of the states they would be entering data for.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
38		Enforcement Action Notional Screen: Delegated Agency Formal (top) - Part 2	There is no "date field" for the enforcement action. That is an important piece of information and should be added. Under Status Data: What is the Enforcement Action Status? Under Milestones: It would be helpful and efficient if we could enter the enforcement action type and date in this area. That would allow us to use this screen like the action linking screen in AFS. Under Statute/Law Section/Program: Will the "Programs Violated" be the same as the air programs in Legacy AFS? The examples haven't shown Air Programs for Title V or SIP. Will these be included?	Chris Cote	Ventura County APCD	
39	22	Enforcement Action Notional Screen: Delegated Agency Formal **(bottom)**	Only the final "collected penalty" has relevance and any "assessed" penalty should never be MDR as discussed above. The reporting of actual penalties collected should be what is reflected as real data. EPA and the public should be concerned with actual <u>outcomes</u> of cases not starting points and the negotiation process. Also reporting only assessed penalties misrepresents what action was taken and what amount was actually collected. This is problematic when reporting such data in public forums such as ECHO. If the assessed amounts are actually used in any reporting to Congress (or others), it grossly overstates case results which is a misrepresentation of fact and misleading.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
40	23	Enforcement Action Notional Screen: Delegated Agency Formal - Milestones	As we commented to NAACA on the HPV policy proposed revisions, milestones are arbitrary and capricious and should be eliminated. Case calendars are not within an agencies control. When the case has been referred for litigation and particularly when it is in a court's hands we have no say. Cass whether potentially civil or criminal have their own timelines over which we have no control.	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
41	23	Enforcement Action Notional Screen: Delegated Agency Formal - Milestones	Under "Milestone", there fields for the Air Resolution Date and Enforcement Action Closed. These seem to overlap. The resolving date is the date that the enforcement action is closed. What is the difference between these 2 date fields? All the fields on this screen appear to be optional. If that's true, how do we enter a resolving action to close the violation? Actually, this would be the perfect data entry screen and might be the only one we need. We could list the action type and date here. We aren't using a result code in the new system so we don't need space for that. You could add a column for the penalty. It seems like the "Air Resolution Date" could be next to the "EA Resolution Type". The Action Identifier is listed at the top of the screen but there is another field at the bottom of the screen for a "Combined with/Superseded by Enforcement Action Identifier". Is this where you would link ID's from other violations? Please explain this field.	Chris Cote	Ventura County APCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
42	24	Enforcement Action Outstanding Issues	If I understand the question, the system needs to be as minimal as possible. The resolving action only requires type and date fields. These fields can be part of another screen. They don't need a separate screen. That's the answer to what appears to be the question here.	Chris Cote	Ventura County APCD	
			If we have multiple NOV's that settle at different times we could have multiple closing/resolving dates. Most of the time violations at a facility settle at the same time. But, in a case where one piece of equipment needs more time to get back in compliance, that violation could take longer to settle. An example would be that one piece of equipment has to be re-tested. C31 I'm not sure how that would be entered in AFS. We might wait until all the violations are settled and enter everything at the same time.			
43	24	Enforcement Action Outstanding Issues	We don not have "final orders" so this concept is beyond us and is unnecessary for our purposes.	Greg Gjerde	SDAPCD	
44	26	Action Linking Assumptions/Constraints	All linking must be optional. Agency data duties are divided by functions. For instances, the person entering inspection and CMS data is different from the person entering HPVs. There is no information to link to and it is not linked or tracked in our database as EPA does. We cannot do linkage.	Greg Gjerde	SDAPCD	
45	29	Action Linking Modernization Items	Please change the term "Achieved Date " to something like "Final Date" or "Date Closed".	Greg Gjerde	SDAPCD	

ID	SLIDE	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
46	29	Action Linking Modernization Items	Very Good Action Linking Modernization Items Slide	Bernard McKee	NC DAQ	5/30/2012

5.4 ALLEGED VIOLATION FILES

Module Being Reviewed	ALLEGED VIOLATION FILES
Name	TIER 3 COMMENTS
Date	3/14/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	SLIDE	Comment	Submitted By	Organization	Date
1	1	Right now the assumption is that we build with the needs identified by the Needs Analysis and work in HPV Policy changes later. Violation definitions are required on all violations-FRV or HPV. Non-FRV violations may be tracked, but are considered optional reporting. Violations are to be described as ALLEGED VIOLATION DETERMINATION and are either a: FRV, HPV, or Non-FRV. ALL violations are to be kept enforcement sensitive until a NOTICE OF VIOLATION (NOV) action is applied to the ALLEGED VIOLATION DETERMINATION. If no NOV action is applied to linked data, then the Alleged Violation Determination will remain enforcement sensitive. HPVs will be identified via the Violation Type Codes selected. FRVs will require linkage of the NOV.	BETSY METCALF	EPA, OECA, OC	3/14/2012
2	2	"stationary (and some mobile) sources" should be changed to read "stationary and portable sources"	BETSY METCALF	EPA, OECA, OC	3/14/2012
3	3	Correct assumptions.	BETSY METCALF	EPA, OECA, OC	3/14/2012

ID	SLIDE	Comment	Submitted By	Organization	Date
4	4	The Determination Box should read "Alleged Violation Determination". These will be the identification of FRVs. Depending upon the type of violation identified, the Alleged Violation will remain an FRV unless the HPV violation types are selected.	BETSY METCALF	EPA, OECA, OC	3/14/2012
5	4	Day Zero is not calculated, it is entered by the user. The Alleged Violation is automatically an FRV unless the violation type codes meet the definition of HPV.	BETSY METCALF	EPA, OECA, OC	3/14/2012
6	5	EPA/State/LCON/Tribes can make an Alleged Violation Determination. No one issues anything, unless you want to count the Notice of Violation as something that is "issued". Yes, any facility can receive an FRV or HPV, regardless of class. If a source is not in AFS, it is added, then violation information added.	BETSY METCALF	EPA, OECA, OC	3/14/2012
7	5	What: Any Compliance Monitoring activity can identify an Alleged Violation. These actions are for the most part MDRs and required to be reported. If an Alleged Violation is discovered, this will become a NEW ACTIVITIY.	BETSY METCALF	EPA, OECA, OC	3/14/2012

ID	SLIDE	Comment	Submitted By	Organization	Date
8	6	Compliance Determinate Date is the same as the Alleged Violation Determination. It is user supplied and not generated from the system. Discovery Date: Is an existing requirement, is system generated, and is the compliance monitoring activity that has been linked to the Alleged Violation Determination. Alleged Violation Determination will equate to the current DAY ZERO. Yes, we will need to track Violation Start/End dates, but this will be done through reported activity. For example, Violation Start is the Alleged Violation Determination Date. Violation End is the Resolution Date.	BETSY METCALF	EPA, OECA, OC	3/14/2012
9	6	If multiple addressing actions are linked to the violation then the first occurring action is chosen by the system as the Addressing Action and provides the addressed date. This is also true for multiple activities equating to Resolution Date. There will be only one Addressing Date and one Resolution Date. The Resolution Date cannot be prior to an addressing date.	BETSY METCALF	EPA, OECA, OC	3/14/2012
10	7	This slide reflects current guidance and this is what we need to use.	BETSY METCALF	EPA, OECA, OC	3/14/2012
11	8	Days Used to Address is correct. Days Used to Resolve is correct. Linkage of FRV data is still not approved, so at this time, NO FRV data will not require calculation of days used to address or resolve. No special indicators for exceedances on timeliness have been requested so no indicator is needed.	BETSY METCALF	EPA, OECA, OC	3/14/2012
12	9	Do not use obsolete codes in guidance. These will be needed for maintenance of historical records. A new activity for ALLEGED VIOLATION DETERMINATION will need to be added.	BETSY METCALF	EPA, OECA, OC	3/14/2012
13	10	Correct. Ensure that pathways are enforcement sensitive until the NOV is added.	BETSY METCALF	EPA, OECA, OC	3/14/2012

ID	SLIDE	Comment	Submitted By	Organization	Date
14	11	Appear correct. Ensure that pathways are enforcement sensitive until the NOV is added.	BETSY METCALF	EPA, OECA, OC	3/14/2012
15	12	No additional comments.	BETSY METCALF	EPA, OECA, OC	3/14/2012
16	13	5.11.1: Request suggestions from BAH. Please default Lead Agency information. If the lead changes in the pathway, the system needs to reflect that change. The Day Zero action DOES NOT change, only the Lead.	BETSY METCALF	EPA, OECA, OC	3/14/2012
17	14	Lead Change Tracking: Current policy indicates lead change provides extra time to address (40 additional days). Data elements for a Lead Change are an action and date. Lead Change can change back. Lead Change does not affect programs or pollutants being tracked in the pathway. All comments should remain enforcement sensitive.	BETSY METCALF	EPA, OECA, OC	3/14/2012
18	15	NPDES violation structure would have to be reviewed. No new data requirements should be introduced, other than the ones already identified: Alleged Violation Determination with Violation Type to include FRVs, Linkage of NOV actions.	BETSY METCALF	EPA, OECA, OC	3/14/2012
19	17	DMR violations to not equate to FRV/HPV.	BETSY METCALF	EPA, OECA, OC	3/14/2012
20	18	This screen would require CAA milestones instead of NPDES milestones.	BETSY METCALF	EPA, OECA, OC	3/14/2012
21	19	Single Event violation does not equate to CAA violations.	BETSY METCALF	EPA, OECA, OC	3/14/2012
22	20	Single Event violation does not equate to CAA violations.	BETSY METCALF	EPA, OECA, OC	3/14/2012

ID	SLIDE	Comment	Submitted By	Organization	Date
23	21	This can be adapted for AFS. As our attorney noted, the Compliance Determination needs to be defined as "Alleged Violation Determination".	BETSY METCALF	EPA, OECA, OC	3/14/2012

5.5 BATCH

Module Being Reviewed	BATCH
Name	TIER 3 REVIEW
Date	3/18/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
1	Overall	There are some formatting issues with the document: Page numbers are incorrect. Section 1.0.4 has unreadable references. Section 1.0.5 has unreadable references. The document has empty pages at Figure 1.0-7, Figure 1.0-8, Figure 1.0-9 and Figure 1.0-14.	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
2	Overall	Some nomenclature is not defined and unknown to AFS Users: Payload used to describe XML files, and Full Batch Users identified when using XML reports. Please define these terms.	Betsy Metcalf	EPA, OECA, OC	3/17/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
3	Overall	Throughout the document the XML Schema figures and examples use Permit Data from NPDES. I realize that there are no CAA-ICIS schema examples readily available, but please use examples from FE&C or State NPDES Enforcement data. This is information that AFS users can understand and relate to. Use of permit files for the CWA is not a good example for CAA users. Additionally, the examples have been generated a few years ago and are probably examples used for NPDES training. Please make the document examples something that is easier for CAA personnel to follow.	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
4	Overall	Consider adding a list of the proposed AFS data families to be batched	Alison Kittle	DSIMB	3/12/2012	
5	Overall	There is a need to change data when dates are entered incorrectly the first time during a batch transaction. North Carolina sends numbered historical (unchanged), new and updated action data for each facility to AFS monthly via a batch transaction. NC's database system currently has action numbers that are synchronized with the action numbers that are in AFS (90,000 range). North Carolina will continue to create an action table for each facility and export the data from them all to the modernized AFS via XML schema.	Bernard McKee	NC	3/16/2012	
6	Overall	Please make all reports optional for download in Excel and Adobe format.	Bernard McKee	NC	3/16/2012	
7	Overall	There is a need to have 'Edit' functionality in the modernized system. This would function could serve as an option to compare the data sent to AFS and allow batch users to submit files and receive error reports before final submission to the AFS. Please make this edit function option that the batch user would have toggle yes or no when they submit the file to CDX Client CDX.	Bernard McKee	NC	3/16/2012	
8	Overall	BAH did not mention much about tools used by reporters when sending data to the EPA node. CAA-AFS should have ability to convey agency data from an excel format to xml schema. This would allow agencies to continue to report until full conversion programs from legacy AFS format to XML can be written.	Bernard McKee, Betsy Metcalf	NC, EPA	3/16/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organizati on	Date	Status
9	1.0 BATCH	CAA-AFS would like to provide a new service to users where web services will be used to automatically pick up files from agencies upon an agreed-upon schedule. Please incorporate this into this document. We realize that we will have to work out these specifics with CDX, but this is the requested service we want to incorporate into this design.	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
10	1.0 BATCH	The acronym for CDX should be moved up to the first paragraph from the second.	Michelle Torreano	EPA, OECA, OC	3/16/2012	
11	1.0 BATCH	Change "preliminary data and user validity checks" to "preliminary checks"; remove "be able to submit AFS data via a batch process to ICIS. Users will"; reorder the CDX functions in the order they are performed (e.g., authentication, virus scanning, schema validation, archiving); remove sentence starting with "CDX provides a web services..."; change "parsing the XML files, sequencing" to "parsing data contained in the XML files, sequencing"; change "ICIS service tier. Finally", to "ICIS service tier to store acceptable data into the ICIS database. Finally"; change "A batch typically comprises" to "A batch is typically comprised of"; change "may contain multiple transaction records, called payloads, with different submission types" to "may contain multiple data families with records, called payloads, of different transaction types".	Alison Kittle	DSIMB	3/12/2012	
12	1.0.1 Summary of Batch Modernization in ICIS-AFS	Please do not include Permit Identifiers so prominently in this document. Permits data in CAA-AFS is OPTIONAL information and we do not want our core structure built around this information. This section indicates that Legacy AFS requires agencies to submit a 99999 number generator for actions. This is incorrect and this section should be rewritten to capture this. Do not agree that requiring agencies to provide a unique keys or identify a set of data to create keys is providing a more streamlined process than Legacy AFS. If anything is it requiring more information out of our reporting partners. This section needs to reflect the need of unique identifiers coming into the system for linking data that have a programmatic relationship (HPV or FRV data).	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
13	1.0.1 Summary of Batch Modernization in ICIS-AFS	I am opposed to using any data fields (such as date an action occurred or the type of action) as a key identifier for a record. Data in these fields are subject to being misreported/mistyped and could require correction. In addition to the unnecessary burden of requiring an agency to delete a record and then read it, it could result in the entry of the record being classified as untimely with regard to the EPA timeliness standard since the new record would have a later date added.	Christy Monk	AL	3/14/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organizati on	Date	Status
14	1.0.1 Summary of Batch Modernization in ICIS-AFS	Unique Identifiers for Identifying Batch Data: Given the 15Mar2012 conversation it sounds like we are not settling for using only natural keys to ID records (Facility ID, Compliance Monitoring Type, and Actual End Date given as example). I would just like to reiterate though that for batch users reliance on natural keys would complicate corrections involving dates or incorrect action types. In addition it would complicate tracking deletes of incorrectly added actions. Oregon already generates are own action numbers and we are comfortable with using ID's for HPV action linking also.	Brian Fields	ORDEQ	3/15/2012	
15	1.0.1 Summary of Batch Modernization in ICIS-AFS	Type of Transactions- it says replace can be used to add the record if it doesn't exist. How is this different then the New transaction? Do we need New if Replace does the same thing? Or maybe just rename Replace to Add or Replace.

Delete transactions- is there supposed to be emphasis on "certain"? Where is the list of the "certain" records identified that would allow a delete?

Mass Delete- I'm not clear on this "certain child records" again. What is this sentence getting at?

Data Validation- last sentence needs "be" and "not" switched. | Michelle Torreano | EPA, OECA, OC | 3/16/2012 | |
| 16 | 1.0.1 Summary of Batch Modernization in ICIS-AFS | Change "has been changed and improved" to "has been changed"; change "provides a Flat File" to "provides an ASCII Flat File"; change "embedded with the XML file" to "embedded within the XML file for each parent record"; change "a Replace transaction may be used" to "a Replace transaction will be available"; the sentence starting with "Thus, the functions and capabilities is not a true statement because Replace infers the state knows a record has been added or changed but not deleted, but the pre-processor can detect the deletes; make the transaction bullets and accompanying text singular and in present tense ("New transaction - establishes a new record...the New transaction will fail"); describe how an asterisk can be used to blank out a field in ICIS in the Change transaction bullet; change "language messages containing unique identifier fields" to "language messages using keys comprised of unique identifier fields"; change "delivering the audit reports in XML and/or PDF" to "delivering the error reports in XML and PDF format electronically through CDX or within the application as a standard report"; under the Data Validation bullet include verbage that says ICIS-AFS will have a test environment for their submissions; under the Data Validation bullet include verbage that the current optional Edit step does not always work well because if a parent record is being submitted at the same time as a child | Alison Kittle | DSIMB | 3/12/2012 | |

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		record and the parent record passes the edit check, its child record will throw a rejection because its parent does not exist in AFS; need a new subsection for what Betsy calls the "Compare Pre-Processor that describes what it does and that Exchange Network contractors may be able to develop an AFS plug-in to do this function; the table at the end of this section should have a title, and its last row should say "A February 2012 Batch submission of NPDES data contained 46,297 transactions, which took 7 minutes to parse and 34 minutes to process".				
17	1.0.2 Batch Functional Requirements	Mass Delete sounds dangerous. Please explain how ICIS regulates this ability. The section indicates that performance will be improved via the ability to process large volumes of data in a timely manner. Can you describe the process so that an agency will thousands of transactions in a batch upload would understand? Since we are taking the Compare process away, is there a way to assist agencies with initial mapping? Could BAH suggest a tool that would assist agencies in mapping their data? It was thought that the Universal Interface would be able to create a mapping process that would assist agencies with the turnover from the legacy system to the modernized one.	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
18	Table 1.0-1 ICIS-AFS Batch Requirements	At the bottom of this table are some abbreviations, what are they for?	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
19	Table 1.0-1 ICIS-AFS Batch Requirements	ID4- Change consistency to consistently.	Michelle Torreano	EPA, OECA, OC	3/16/2012	
20	Table 1.0-1 ICIS-AFS Batch Requirements	ID #2 is incorrect b/c CDX asks we only allow zipped files to lessen the impact of others submitting data to ICIS at the same time; ID#3 should indicate the transaction timestamps will be used and other algorithms may be used as necessary.	Alison Kittle	DSIMB	3/12/2012	
21	1.0.4 CDX-ICIS Interface	Footnote 1 for this section references "edit a permit". Please do not use permit examples in this document. Permit data is optional data and should be used in the needs and requirements documents.	Betsy Metcalf	EPA, OECA, OC	3/17/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organizati on	Date	Status
22	1.0.4 CDX-ICIS Interface	Would like to be able to submit a QA batch file so we can receive a feed back report on the affects of the load can be reviewed prior to the load.	Cindy Troupe	ORDEQ	3/15/2012	
23	1.0.4 CDX-ICIS Interface	Interface between User and CDX section: Add "manually or electronically using a NAAS account" to the end of the 1st sentence under Interface between User and CDX section and remove the two sentences after it; CDX sends a verification after schema validation instead of before virus scanning; the schema validation writeup under the next section needs to be put into this section because CDX performs it in production instead of ICIS. Interface between CDX and ICIS: change "indicate the audit reports and XML batch" to "indicate the batch audit reports or XML version of the batch audit reports and XML batch"; I'm not aware of ICIS sending any of what is described under the notification message section, please check with Rajendra on what is being sent to make sure this is correct.	Alison Kittle	DSIMB	3/12/2012	
24	Figure 1.0-1 ICIS XML Submission Processing	How does the reporting agency perform an XML Schema Validation? Is there a specific tool that is recommended or are we expecting all agencies to do this on their own? Will we provide business rules in such a way that they can be imported into a schema verification tool? After the firewall from CDX to ICIS, there is a box marked "Check Submission Completeness". What is this and what is checked?	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
25	Figure 1.0-1 ICIS XML Submission Processing	The staging tables for the plug ins should spell out in long form, the table and field names provided in the schema definitions. Tables and fields which a are strings of three or four digit abbreviations based on the schema definitions are unnecessarily difficult to work with. It would be easier to map tables and fields that have 50 character names as opposed to 12 character names composed of a successes ion of abbreviations. Remember that most modern database environments have autofill features which make long table and field name easy to work with. See the table and field names for the CERS schema based tables used by EIS for an example of how not to name tables and fields. An extra level of analysis is necessary just to figure how tables like "CERS_EMS_UNT_PRC_CTR_APC_CT_MS" correspond to the schema.	Brian Fields	ORDEQ	3/15/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
26	Figure 1.0-1 ICIS XML Submission Processing	Success' should be noted in the CDX box between Perform XML schema validation and send valid XML to ICIS. Also, if it has errors, it the only thing that happens is that they get a notification? ICIS box needs more explanation on what steps some of the arrows and shapes represent.	Michelle Torreano	EPA, OECA, OC	3/16/2012	
27	Figure 1.0-1 ICIS XML Submission Processing	This needs to reflect what happens in production, not test. In box for Region/State… change "Perform XML validation" to "zip XML file(s)"; schema validation occurs at CDX before archiving; ICIS retrieves the submission from a temporary directory and not the archives; CDX sends a Failure message back if virus is found or XML does not validate, and if the schema validation fails it logs the first 100 errors; ICIS does not perform schema validation nor does it send receipt acknowledgements; before ICIS checks the business rules on each payload it checks the file and ICIS ID and will send rejections back to CDX for file I/O errors and unknown ICIS IDs; change "Send Notification to CDX" to "Notify CDX of completion and send results files"	Alison Kittle	DSIMB	3/12/2012	
28	Figure 1.0-2 CDX Client Submission Screen Shot	Description of the figure indicate that this is the screen users will see when submitting a Batch file through their local tool. What is this? Can you please explain what users will need in order to use the CDX portal. Additionally there is reference to the use of the Full Node. What is the Full Node and what other options are there?	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
29	Figure 1.0-2 CDX Client Submission Screen Shot	The CDX Node Client package is really designed for testing purposes and is difficult for a typical state/tribe etc. to use so remove this from the document	Alison Kittle	DSIMB	3/12/2012	
30	Figure 1.0-3. CDX Web Submission Screen Shot	Add verbiage stating that this form is representative of what is available today but will be replaced with the Exchange Network Services Center as the manual upload process	Alison Kittle	DSIMB	3/12/2012	
31	1.0.5 Batch Submission	Can you please describe the difference between a CDX Client and web application?	Betsy Metcalf	EPA, OECA, OC	3/17/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
32	1.0.5 Batch Submission	Several bullets say a step saves data to the ICIS operational database, when in fact this is only done after parsing has occurred - incoming submissions and parsed data are actually stored in ICIS batch tables that are separate from the ICIS operational tables; remove description of CDX client steps; add text to say that the CDX web upload form will allow the submitter to download their results if they use the Source/FullBatch name value pair; remove URL and login information for CDX web upload form;	Alison Kittle	DSIMB	3/12/2012	
33	1.0.6 XML Design	XML Schema (P23-13), the last bullet- should the word "only" be deleted since multiple submission types are accepted? By leaving "only" in, it's a little confusing. XML Schema (P23-14), second bullet- on batch user enters different batch ID's, ICIS will treat 'them' as a ..... replace 'them' with 'each batch ID' for clarity of the sentence.	Michelle Torreano	EPA, OECA, OC	3/16/2012	
34	1.0.6 XML Design	Change "XML Schema: The Schema will provide" to "XML Schema: XML files that provide"; change "XML Schemas registered" to "XML Schema developed for AFS and registered" (never use plural for XML Schema); change "Batch users can compress" to "Batch users compress"; change "ICIS will strictly use" to "ICIS will use"; there is no batch ID in the header of a submission file - the batch ID is assigned by CDX - but there is the ID in the header tag that is an ICIS ID and must be a real ID in ICIS and have the roles to add/change/delete the data family/families being submitted; change "data element will be erased" to "data stored in ICIS to be erased"; change "<XXX><XXX>" to "<FirstName><FirstName>" and include that null tags are not allowed (<Firstname/>)	Alison Kittle	DSIMB	3/12/2012	
35	Figure 1.0-4 XML Instance File	Add "ICIS-NPDES" to the title and verbiage so the reader knows these are not examples of proposed ICIS-AFS XML submissions	Alison Kittle	DSIMB	3/12/2012	
36	Figure 1.0-5 XML Instance File Linking a Storm Water Event Report to a DMR Form	Can you use a different example?	Betsy Metcalf	EPA, OECA, OC	3/17/2012	
37	Figure 1.0-5 XML Instance File Linking a Storm Water Event Report to a	Add "ICIS-NPDES" to the title and verbiage so the reader knows these are not examples of proposed ICIS-AFS XML submissions	Alison Kittle	DSIMB	3/12/2012	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organizati on	Date	Status
	DMR Form					
38	Figure 1.0-6. XML Instance File Unlinking a Storm Water Event Report to a DMR Form	Add "ICIS-NPDES" to the title and verbiage so the reader knows these are not examples of proposed ICIS-AFS XML submissions	Alison Kittle	DSIMB	3/12/2012	
39	1.0.7 Batch Audit Reports	I think it would be good to get these in excel too or something besides PDF.	Michelle Torreano	EPA, OECA, OC	3/16/2012	
40	1.0.7 Batch Audit Reports	CDX places the results of schema validation an XML for schema validation it generates an XML called "Submission-metadata.xml" that is downloaded along with the batch audit reports and examples of this file with passing results and schema validation errors should be added to this document; ICIS returns a PDF to users of the system if the ICIS ID in the ID tag of the submission header is invalid and this should be discussed in this section.	Alison Kittle	DSIMB	3/12/2012	
41	1.0.8 Batch XML Response Files	Receiving response files in an column-row format such as excel would be more useful than receiving response files in XML or formatted text. Spreadsheets are easier to sort and manipulate for review than formatted text files.	Brian Fields	ORDEQ	3/15/2012	

5.6   UNIQUE IDENTIFIER

Module Being Reviewed	UNIQUE IDENTIFIERS
Name	TIER 3 COMMENTS
Date	3/21/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
1	Overall	Unique Identifiers will be necessary where data is linked or has a relationship to other activities. Currently the only requirement for linkage is HPV tracking. Optional tracking includes FCE tracking, and the tracking of activities for FRVs.	Betsy Metcalf	EPA, OECA,OC	3/21/2012
2	Overview	Permit Identifiers would not be necessary. The Permit ID will be enough to link any optional permit activity to the TV ACC. The section entitled "Legacy AFS" indicates that AFS requires agencies to submit an action number generator. This is incorrect.	Betsy Metcalf	EPA, OECA,OC	3/21/2012
3	Notional Unique Identifiers - Option 1	Not recommended.	Betsy Metcalf	EPA, OECA,OC	3/21/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
4	Notional Unique Identifiers - Option 2	This option appears to be the only viable option. Option 3 gathers unique characterizes from existing data, but does not address activities that may be duplicated on the same day, requiring that the reporting agency include a unique number.	Betsy Metcalf	EPA, OECA,OC	3/21/2012
5	Notional Unique Identifiers - Option 2	Alaska votes for this option 2. In our database we currently are generating a unique identifier that can be uploaded to EPA's database (alpha-numeric-10 characters). This would create a common identifier between EPA's and AK database which would make it easier for doing QA/QC work.	Nattinee Nipataruedi	State of AK, Tier 3	3/29/2012
6	Notional Unique Identifiers - Option 3	This option would be using dates reported as part of the unique identifier. Should the date change, the entire record would have to be deleted and reentered. We had a situation in AFS where this was introduced for HPVs and was found to be unworkable, as uploads virtually had to stop for the deletion of the action.	Betsy Metcalf	EPA, OECA,OC	3/21/2012
7	Facility Identifier	It is recommended that the numbering protocol currently used by Legacy AFS be carried forward.	Betsy Metcalf	EPA, OECA,OC	3/21/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
8	Facility Identifier	Alaska would like for the AFS ID number to be carried forward since it is currently used in the state's database. It is a unique number that identifies the each stationary source in the state.	Nattinee Nipataruedi	State of AK, Tier 3	3/29/2012

5.7 EXTERNAL INTERFACE SYSTEMS

Module Being Reviewed	EXTERNAL INTERFACE SYSTEMS
Name	TIER 3 REVIEW
Date	4/16/2012
Organization	U.S. EPA/OECA/OC/ETDD
Summary of Changes - 6/19/2012	Added two new requirements in the FRS section to include updating of audit table with the system name and Date it was imported and updated. Updated each respective external system's requirement on system administration functions to include the frequency of data imports or exports. Updated Electronic Reporting Repository section to make it generic and added the types of data planned for imports. Added CEM/EER and Wood Stoves data elements to be imported from the electronic reporting repository. Added requirements to each respective external systems where data are imported for system to update audit tables.

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
1		This module discusses the sharing of enforcement sensitive data with other EPA data systems. We have concerns about sharing enforcement sensitive data. District counsel has advised us that enforcement data cannot be released to the public until cases are settled. If ECHO plans to make enforcement case data available to the public before settlement, then we may have to revisit violation tracking in ICIS-AFS and/or wait until cases are settled before entering violation data. We need to ensure that enforcement sensitive data isn't shared until cases are settled. Will the new system use a "yes/no" indicator like Legacy AFS to mark an action as enforcement sensitive? Or, will the system determine that an action is enforcement sensitive by the action type or some other means? We also have concerns about how the system will determine which data is correct and which data will be presented to the public. In the reviews we've done of the data in ECHO, the air data is the most current. But, it may not be the primary source of data.	Chris Cote	Ventura County, CA	4/13/2012	
2	1.0 External Interface Systems	It is my understanding that the combined systems from IDEA will be referred to as "ECHO" and not "IDEA".	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
3	1.0 External Interface Systems	There are serious security concerns regarding sharing or exchange data between various data systems. This is especially true with enforcement data. EPA's definition of "enforcement sensitive data" is quite limited compared to state and local laws and regulations that the state and local agencies are subject to. State and local agencies in California protect more data and records than does EPA because it may be exempt from disclosure under our state's Public Records Act. A major concern is that EPA's records and data (such as ICIS-AFS, etc.) are subject to the Freedom of Information Act (FOIA) and public disclosure by EPA when state and local agencies are not subject to FOIA. Many of agencies generally may not release inspection, violation reports, other documents and data that are part of a potential enforcement case until after the case has been actually completed. We would never chance those documents somehow being released by EPA or placed on public access website which could jeopardize our case strategies or outcomes. Violations even HPVs are only "alleged violations" until they are proven in court. Sharing information between the systems raises serious security and other concerns.	Greg Gjerde	San Diego APCD	4/13/2012	

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
4	1.0.1 Summary of External Interface System Modernization in ICIS-AFS	**ECHO (IDEA/OTIS, etc.)** – only very limited compliance and enforcement data from ICIS-AFS should be shared with these systems for the above stated reasons. More caution must be exercised in data sharing and severe limits placed on what data is publically accessible. Any data protected by state or local laws that differ from EPA regulations and FOIA particularly in enforcement cases should not be required. If it is ever required it should be only after the entire case is concluded. **FRS** – as a local agency we are unfamiliar with FRS. The term programmatic interest data is undefined and unclear to us. Only basic facility level data should be shared if any with FRS. Data relating to specific programs should remain exclusively within ICIS-AFS. **ENVIROFACTS** - only very limited compliance and enforcement data from ICIS-AFS should be shared with these systems for the above stated reasons. More caution must be exercised in data sharing and limits placed on what data is publically accessible. Any data protected by state or local laws that differ from EPA regulations and FOIA particularly in enforcement cases should not be required. If it is ever required it should be only after the entire case is concluded. **Electronic Repositorie**s (E.g., ERT like) We have expressed our concerns of accuracy and completeness about this type data in the stack test module. The data points collected in the ERT do not represent a complete (or accurate) data set necessary to determine compliance or to validate a source test. For instance, with a particulate test, there are other data points used to calculate a value. We need to see the intermediate calculations that go into determining a successful or failed test. We frequently find calculation errors and in those instances source test reports need revision. We could not rely on ERT data for or own compliance and enforcement purposes and need regulated sources to submit the complete data in a format that fits our local agency requirements. Additionally, our agency's local source test methods and data requirements per our own agency rules, permit conditions and source test protocols often call for different or additional data points than the EPA method and much of our agency required data points are not in the ERT. ERT data and any similar source supplied data have no place in a modernized ICIS-AFS. We feel electronic submittal (paperless) is the future and proper, it does need to meet our needs. **SRS** - Ambient air quality standards, and why they are regulated, differ considerably from chemicals in waste and water. Water and waste pollutants themselves are directly regulated. On the other hand, seconrdary air pollutants are more complex due to such things as photochemical reactions (Ozone) that create the actual pollutants after-the-fact in the atmosphere. Placing air emission, or any other air data, in SRS could be quite misleading for comparative purposes and to the public. A specific chemical compound emitted may not be the actual pollutant regulated, but a precursor; such is the case with the number one air pollutant regulated – Ozone. Few companies	Greg Gjerde	San Diego APCD	4/13/2012	

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		directly emit ozone. Air data does not belong in SRS.				

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
5	1.0.1 Summary of External Interface System Modernization in ICIS-AFS	There is discussion of merging IDEA, OTIS, and ECHO. Currently OTIS is for government only use, while ECHO is available to the public. Will the databases maintain a government only function? Or will all data be available to the public? The main concern is that enforcement sensitive data be kept private until cases are settled. Some types of enforcement sensitive data were discussed on the call but not all of the data related to enforcement cases. FRS: When you view facilities in ECHO, you can see data from the various systems. The air program tends to inspect facilities more frequently than other programs. In addition, name / address changes tend to be reported by the air program before the other programs. Will the air data be maintained in the system or will it be over-written? How will the system determine which data is the most current and/or presented to the public? How can we protect data that is correct from being overwritten by FRS? One time when I found an error in ECHO, I sent a notice to ECHO. They sent a response that the data would not be corrected. (I found this response from ECHO discouraging. It seemed that they didn't want to know about errors.) After I heard from ECHO, I contacted the Region and they made the correction. Single sign-on: It sounds like the idea is to log on once and then be able to view data in ICIS-AFS and/or ECHO/IDEA etc. How will secure data be kept secure? Will a person's login determine their security level and the data they will be able to access? Envirofacts: This section says Envirofacts will not pull enforcement sensitive data. Is this the case? Electronic Reporting: I looked in WebFIRE and it seems to have emission factor data. (I understand that ERT was designed to collect data to help determine/update emission factors and was not designed to be used by the air program enforcement.) I went into WebFIRE and didn't see a way to search the data by facility or location. Will this search capability be added to WebFIRE? SRS: Has "information about substances that are tracked by EPA and other sources." Other programs may track different pollutants than the Air Program. Will SRS indicate which pollutants are associated with the different programs? If the pollutants are just linked to a facility, it could be confusing for users and the public to know	Chris Cote	Ventura County, CA	4/13/2012	

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		which agencies should be reporting on which pollutants. What will happen during the nightly data transfers? Will data be marked for change or overwritten? Will there be notifications of what data has changed?				
6	1.0.2 ECHO	When a facility is listed on the Echo Watch List, a report should automatically sent to the agency monthly	BERNARD MCKEE	NC DENR	4/13/2012	
7	1.0.2 ECHO	ECHO (IDEA/OTIS, etc.) – only very limited compliance and enforcement data from ICIS-AFS should be shared with these systems for the above stated reasons. More caution must be exercised in data sharing and severe limits placed on what data is publically accessible. Any data protected by state or local laws that differ from EPA regulations and FOIA particularly in enforcement cases should not be required. If it is ever required it should be only after the entire case is concluded.	Greg Gjerde	San Diego APCD	4/13/2012	
8	1.0.2.1 ECHO Requirements	It is assumed that ICIS-CAA will be made available to ECHO in a separate database from production--correct?	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
9	Table 1.0-1 ICIS-AFS ECHO Requirements	1. This section says the enforcement sensitive data will be in ECHO. But, enforcement data must be kept private until cases are settled. How will "Enforcement Sensitive" be identified? Will the new system use a "yes/no" indicator on actions like Legacy AFS? Or, will the system determine it by action type or some other means? 2. Single sign-on capacity and navigating between ICIS-AFS and ECHO. Will there be different levels of security in the system? Will the public have access to the same data as government employees? If not, we may have to revisit data entry policies. 4. It sounds like ECHO will continue to allow users to search for data by facility and location. 5. It's good to have a procedure to be able to submit and track data corrections.	Chris Cote	Ventura County, CA	4/13/2012	

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
10	1.0.2.2 ECHO Process	1. This section says the enforcement sensitive data in ICIS-AFS will not be shared with ECHO. But, Table 1.0-1, #1 say ECHO will pull the entire ICIS-AFS database, including enforcement sensitive data on a nightly basis. Which statement is correct?	Chris Cote	Ventura County, CA	4/13/2012	
11	1.0.3.1 FRS Requirements	It is not clear how the FRS fields that will be "pushed" back to AFS will be displayed. Please ensure the final documents will include a mockup screen to properly display this information.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	
12	1.0.3.1 FRS Requirements	FRS – as a local agency we are unfamiliar with FRS. The term programmatic interest data is undefined and unclear to us. Only basic facility level data should be shared if any with FRS. Data relating to specific programs should remain exclusively within ICIS-AFS.	Greg Gjerde	San Diego APCD	4/13/2012	
13	1.0.3.1 FRS Requirements	1. What data are the following fields referring to?	Chris Cote	Ventura County, CA	4/13/2012	

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status
		Facility Affiliation, Organization - Is this the parent company? Interest, Supplemental Interest				
		2. This section says that ICIS-AFS enforcement sensitive data will not be exported to FRS.				
		4. This section says data will be linked between ICIS-AFS and FRS through the AFS and/or FRS ID. We don't use the FRS ID and would prefer to use the current CDS ID which is the state + county + CDS. We could also use the current CDS ID + LCON.				
		If there are states/locals that use the FRS ID, it would be okay to have an option for them to use the FRS ID. Another option that could work is to have the system link the CDS ID to the FRS ID and then use the FRS ID in the background. We want to be able to continue using the CDS ID and we don't want to use the FRS ID.				
		We want to avoid a situation where we would have to research the FRS ID before we could add any data. Making the FRS ID mandatory would impose an extra layer of tracking.				
		6. What data are the following fields referring to?				
		Facility Affiliation, Organization, Interest, Supplemental Interest, System Reference, Agency Reference, Interest Reference				
		7. What options do we have if FRS data is incorrect? Who do we submit data changes to?				
		9. Will FRS have different levels of security for government vs. public users? Will this be regulated by user ID? Or, some other system?				

Point	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Status

14	1.0.3.2 FRS Process	ICIS-AFS and FRS will push data between systems. Many of the fields are the same in both systems. What do we do if the data in the systems disagrees or is wrong. Who and how do we notify of the problem?
		
		What are the following ICIS-AFS fields referring to?
		   Facility Affiliation,
		   Organization - Is this the parent company?
		   Interest,
		   Supplemental Interest
		
		What are the following FRS fields referring to?
		   Facility Affiliation, Organization, Interest, Supplemental Interest, System Reference, Agency Reference, Interest Reference
		
		1. ICIS-AFS will not load enforcement sensitive data into FRS.
			Chris Cote	Ventura County, CA	4/13/2012	

15	1.0.4 Envirofacts	The document indicates a nightly process. The process frequency may change.	Betsy Metcalf	OECA, OC, ETDD	4/13/2012	

5.8   MDR SUPPORT

Module Being Reviewed	MINIMUM DATA REQUIREMENTS MODULE
Name	TIER 3 REVIEW
Date	4/9/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
1	Overall						

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
2	1.0 Minimum Data Requirements						
3	1.0 Minimum Data Requirements	AFS users have worked to keep MDRs to a minimum. However, over the years the number of MDRs has continued to increase. ICIS-AFS proposes adding more fields and more system MDRs to facilitate data entry. It seems that the increase in reporting burden should be addressed. Adding system required MDRs creates some potential issues. 1) If the data for the system required MDRs isn't available, will the system have a default or an option to enter "NA" for not available? That option would allow the program MDR data that is available to be submitted. 2) If the system required data isn't available and there is no NA option, it seems the system is set up so that no program MDR data can be submitted. Is that the intention?	Chris Cote	Ventura County, CO	4/6/2012	Comment forwarded for information. No action required.	
4	1.0.1 Summary of Minimum Data Requirements Modernization in ICIS-AFS	The DED indicates that the reference table values will be provided where the list of values is not prohibitively long. It is requested that a link is provided to table values where the valid values are too expansive to include in the DED. The DED needs to provide the user with the requirements for just one system, or all. AFS users should not have to weed through NPDES requirements, nor should CWA users have the same issue with CAA fields and requirements.	Betsy Metcalf	EPA, OECA, OC	4/6/2012	Comment Accepted	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
3	1.0.1 Summary of Minimum Data Requirements Modernization in ICIS-AFS	Using different visual Indicators for program vs. system required MDR's - is a good idea. Under "Data Element Basic Information": Edit Check: "For Reference Table values, this section will list the Active values for the data element where the list of values is not prohibitively long." If the Reference Table doesn't list all of the values, would the rest of the values be listed somewhere else?	Chris Cote	Ventura County, CO	4/6/2012	Comment Accepted	
5	1.0.2 MDR Functional Requirements	Line 24-2. Says "The system shall differentiate between programmatically required and system required MDRs with separate visual indicators on the GUI." But, Section 1.0.3 shows a combined program and system MDRs, rather than separate program and system required MDRs.	Chris Cote	Ventura County, CO	4/6/2012	Comment Accepted	
6	Table 1.0-1 ICIS-AFS MDR Requirements						
7	1.0.3 MDR and the Graphic User Interface	It would be more useful if the visual indicators showed: 1. Program only MDRs. 2. Program and system required MDRs. 2. System only required MDR's. If the fields are identified this way, the system only MDR's could be given a default or "Not Available" option so the Program required MDR data could be submitted. The proposed design of visual indicators doesn't allow the system only MDRs to be given a default or "Not Available" option. Therefore, if the system only MDR data is not available, the proposed option won't allow the Program required MDR data to be submitted. Is that a design preference?	Chris Cote	Ventura County, CO	4/6/2012	Comment Accepted	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
8	Figure 1.0-1 Notional Design Screen: Add TV ACC	The Permit ID at the top of the page should be replaced by the Facility ID. Permits are subsets of Facilities. The system needs to be created in a way that users can enter the Facility ID once and then keep adding actions/inspections to the facility. This is how Legacy AFS is set up. All the fields for Reviews and Comments could be on a separate screen as they are optional fields and seem like they would be rarely used. Someone could click on a link if they wanted to add more data i.e. a review or comment.	Chris Cote	Ventura County, CO	4/6/2012	Comment Accepted	
9	Figure 1.0-3 Notial Design Screen: Data Element Dictionary	Under "Edit Checks", there's a statement that the TV ACC Received Date must be less than or equal to the system date. Is the system date today's date? Or some other date? Under "Source", it says System or User-provided. I don't know how the system would know the TV ACC Received Date. The date would have to be provided either by a batch or on-line user. Is "System" referring to data from batch-users? Under "Database Data Type", will the dictionary specify the exact data types, as used by the system? This may not be an issue for dates but may be for other types of fields that contain numbers, i.e. long integer, short integer, etc.	Chris Cote	Ventura County, CO	4/6/2012	Comment Accepted	

5.9   SECURITY

Module Being Reviewed	SECURITY
Name	TIER 3 COMMENTS
Date	6/6/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
1	Overall	AFS current system utilities should be replicated in the new system and should be included in the System Administrator functions and roles. Utilities include: Duplicate Source Combination, Facility Identification Change, Capability to Update Historic Records.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	
2	Overall	* Throughout the document there is mention that there is a pending decision or reevaluation of a policy by EPA on whether EPA users (HQ and Regional) shall always be associate with all system programs. EPA has already made the determination that EPA users (HQ and Regional) shall track the program(s) with which an EPA user is associated. This needs to be done so that only EPA users associated with their particular program(s) can edit those data. The entire document needs to be revised to reflect this requirement that has been given to BAH. * Please define "access." Does this mean users are able to view & update? The document needs to be more explicit on what sections users can view vs. edit. * There's wording throughout the document that discusses, "user data update at their geography or below." At a geography or below doesn't really make sense. Either explain it better in the Geography section 31.0 or consider using the term geographic governance level or geographic governance hierarchy. * Spell out acronyms on first use (Ex.- ADR?)	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	
3	Overall	The ICIS roles and responsibilities listed within this module are considered to be numerous and provide a complexity that is daunting for new users. The air program security model can be significantly simplified by rolling up security "options" into one of three types of users: Administrator, Editor, or Browser. Additionally, these types of users can be further broken down by geographic governance level: HQ, Region or Delegated Agency.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
4	Overall	LCON users should be categorized the same as a State/Tribal/Territory user. These are separate government offices in the Air Program. There are instances where a State employee will be asked to update a Local Control Region's data due to resource issues, just as a State or Regional Office employee may update a Tribal or Territory agency's data. The complexity applied to LCON users does not seem necessary. Please compile this document to group States, Tribes, Territories and Local Control Regions into the same categories.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	
5	31.0 Security	Program- when it says EPA can access all program's data, does this mean view, update, or both? EPA users should not be able to update data from another program they are not associated with.	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	
6	31.0 Security	Sensitive Data Access: This section should cover the current security issues with sensitive access. System security should safeguard all sensitive data for a program, meaning that an AFS user should not have access to sensitive NPDES data, nor should the NPDES user have access to sensitive AFS data.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	
7	31.0.1 User Profile Form	* 2nd sent.- delete abilities should be included as well. * 3rd sent. - Regional Administrator should be changed to ICIS-AFS Regional Compliance Manager. Also, it should be the **ICIS** HQ Security Administrator.	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	
8	31.0.2 Summary of Security modernization in ICIS-AFS	* Removal of Private Data- "it was" should be added after "and" * Security Emphasis- delete period after second "LCON"	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	
9	31.0.3 Security Functional Requirements	* Table number needs to be fixed	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
10	Table 31.0-1 ICIS-AFS Security Requirements	* Table number needs to be fixed * TSMSS shouldn't be needed for the new system. * Wouldn't all the user ID's and password info. be covered in the first item in the table that says the system needs to comply w/ EPA security requirements? If so, we could delete these. * 31.10 and after, I'm assuming when you say "state" you mean the tribes and territories as well. Also, "region" means EPA region. I think these should be specifically listed throughout the document so there are no misunderstandings in the requirements. * 31-17, EPA HQ should be listed too * 31-19, This is not accurate. EPA users should be associated with programs. * 31-26, list out the programs- Air, NPDES, etc. * 31-59, 1st and 2nd bullets, users program should match data program. * 31-59, 4th bullet, 1st dash, add "region" after data's. * 31-60, ICIS Sensitive Data Policy? * 31-51, in accordance with their program and geography. * 31-44, also add a new requirement that says, " The system shall allow one or more users to be assigned to a role"	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	
11	Table 31.0-1 ICIS-AFS Security Requirements	31-23: Regional Administrators shall have the authority to assign sensitive data access privilege. 31-27: The Air Compliance Monitoring activities should be included here (FCE, PCE, TV ACCs, Investigations). These functions describe Air Program only activities. Section 29-31 will be affected by the unique compliance monitoring activities. 31-40: "Front-end users" is not clear. Please define. 31-44: Although one or more roles may be assigned to ICIS users, the Air Program user roles will be collapse down to three type of users: Administrators, Editors or Browsers. 31-51: The footnote for this ID should be much more prominent in this document, with the issues clearly	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
		outlined.					
12	Table 31.0-2 Current Sensitive Data Business Rules	* Table number needs to be fixed * General- Default should be sensitive. Should be removed from footnotes.	Michelle Torreano	EPA/OECA/OC/ETDD	6/5/2012	Please incorporate this comment.	
13	Table 31.0-2 Current Sensitive Data Business Rules	CMS Status: This status is in contained in the compliance status values of current AFS, and is not sensitive. It should not be sensitive in the modernized system.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	
14	Table 31.0-3 Notional Functions for ICIS-AFS.	See Tab 2 for additions to Table 31.0-3.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	
15	Table 31.0-4 Notional Roles for ICIS-AFS	See Tab 3 for additions to Table 31.0-4.	Betsy Metcalf	EPA/OECA/OC/ETDD	6/6/2012	Please incorporate this comment.	

5.10   SYSTEM ADMINISTRATION

Module Being Reviewed	SYSTEM ADMINISTRATION
Name	TIER 3 COMMENTS
Date	6/15/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
1	Overall	This module needs to be in sync with the Security Module, where Air Program Roles and Responsibiltiies were completely redefined. Please ensure that these new roles are used in the final document.	Betsy Metcalf	EPA HQ	6/25/2012
2	Overall	The document needs more discussion and description on the different fields within the Contacts. It is not clear how the Regions, State/Tribe, LCON, Organization and Office and then Agency fields interact when adding Contacts. Must the State be filled in? Can't a Regional Office be identified only by its Regional number? I am trying to reason out how I would train a user to populate these contact fields and cannot understand it. This documentation should clearly outline how someone would enter Contact information for an inspector located in a State or LCON organization, and what the other fields (Office, Agency) would be used for.	Betsy Metcalf	EPA HQ	6/25/2012
3	Overall	It appears to me that our LCON descriptions will also need to be populated in the Organization and perhaps even Office fields, if they are to be used as I think they should be. We will need to have a separate discussion on how these fields will be populated.	Betsy Metcalf	EPA HQ	6/25/2012
4	1.0.1 Summary of System Administration Modernization in CAA ICIS-AFS	User Administration: EPA Regional Administrators will have the rights to add, edit, and reset passwords for their users, as well as assign sensitive or nonsensitive rights. Contacts: EPA and Regional Administrators as well as Delegated Agency Administrators will have the ability to update contact information.	Laurie Kral	EPA R10	6/19/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
5		The table indicates "the system shall allow the user" for most of these requirements, however, the user can be defined differently by the roles to be used by the Air Program. It is difficult to make comments based on the changes to Roles that this document does not reflect.	Betsy Metcalf	EPA HQ	6/25/2012
6	1.0.1 Summary of System Administration Modernization in CAA ICIS-AFS	**Proposed Changes:** • User Administration In Legacy AFS, EPA Regional administers all user access and have the rights to assisgn sensitive or nonsensitive browse rights. EPA Regional Administrators have the rights to add, edit and reset passwords for their regional users. In ICIS-AFS, Delegated Agencies may be able to add, edit, and reset passwords for their users.	Laurie Kral	EPA R10	
7	1.0.1 Summary of System Administration Modernization in CAA ICIS-AFS	• Contacts ICIS-AFS will have a reusable contact list that allows users to select inspectors, staff, etc., on actions or activities without reentering all of the individual's contact information each time. the Regional Administrators and/or the Delegated Agencies Administrator will be able to update his also will allow central update of a user's contact information or government contacts (inspectors) when phone numbers, etc., change	Laurie Kral	EPA R10	
8	1.0.2 System Administration Functional Requirements	12-14: The System shall allow the user to reset passwords for other users. NO only System Administrators and/or Delegated Agency Administrators	Laurie Kral	EPA R10	
9	1.0.2 System Administration Functional Requirements	12-19: The system shall allow the user to edit their own User Profile – EXCEPT THEY CANNOT CHANGE SENSITIVE ACCESS OR SPECIAL PROGRAM ACCESS	Laurie Kral		
10	1.0.2 System Administration Functional Requirements	in the main table that comprises this section, there are no "source references" to any requirements described in the System Requirements Specification for AFS Modernization. There are many requirements in the SRS that are possibly missing from this document. At a quick glance, they include requirements relating to sending broadcast emails, changing MDR designations, managing 'local' tables of activity codes, managing answers to FAQs, managing change requests and their	Steve Hufford	OC/ETDD/D SIMB	5/22/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
		status, tracking security training, and seeing current usage statistics. Have you mapped all the System Administration-type requirements from the SRS document into this description of proposed system administration functionality?			
11	Table 1.0-1 CAA ICIS-AFS System Administration Requirements	Since all of them could arguably relate to System Administration functions, please be sure to consider including rows for the following requirement numbers from the System Requirements Specification document: 5.3.2, 5.4.2, 5.4.4, 5.4.5, 5.22.5, 5.23.2, 5.23.5, 5.24.4, 5.24.6, 5.24.7, 5.24.8, 5.25.2, 5.27.3, 5.29.3, and 5.33.1	Steve Hufford	OC/ETDD/D SIMB	5/22/2012
12	Table 1.0-1 CAA ICIS-AFS System Administration Requirements	21-14: Only system administrators can reset passwords. 21-19: The system shall allow the user to edit their own User Profile – EXCEPT THEY CANNOT CHANGE SENSITIVE ACCESS OR SPECIAL PROGRAM ACCESS	Laurie Kral	EPA R10	6/19/2012
13	Figure 1.0-2 Current ICIS Screen: Assign User Roles	Screen within document too difficult to see. Please ensure that the new Air Program roles defined in the Security Module are used.	Betsy Metcalf	EPA HQ	6/25/2012
14	1.0.5.3 Reset Password for Others	Only administrators should be able to reset passwords.	Laurie Kral	EPA, R10	6/19/2012
15	1.0.5.3 Reset Password for Others	Users (who are the "USERS" --- a Regional AFS systems administrator) may Reset another User's Password by accessing the Reset Password for Others screen from the Home screen.	Laurie Kral	EPA, R10	
16	Figure 1.0-8 Current ICIS Screen: Add Role	Screen within document too difficult to see. Please ensure that the new Air Program roles defined in the Security Module are used.	Betsy Metcalf	EPA HQ	6/25/2012
18	Figure 1.0-9 Current ICIS Screen: Edit	Screen within document too difficult to see. Please ensure that the new Air Program roles defined in the Security Module are used.	Betsy Metcalf	EPA HQ	6/25/2012

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date
	Role				
19	1.0.7.1.1 Add Contact	The Contact tables have so many fields in them, that access to the tables within Contacts should be limited to administrators. The document should be updated to indicate this.	Betsy Metcalf, Laurie Kral	EPA HQ, EPA, R10	6/25/2012
20	1.0.7.1.1 Add Contact	Add Contact, Web: Users must have the Add Contact privileges to add a Contact. WHO is going to have the ability to enter a new users or government contact? EPA HQ or a Regional AFS Systems Administrator? Users may add a Contact by performing the following steps:	Laurie Kral	EPA, R10	
21	1.0.7.2.1 Add Office	The documentation does not define what the Office field is used for. If this field is to discriminate between the Air Program and Enforcement Offices within an Organization, then there should be some discussion concerning how this field should be used. Please describe the differences between the Office, Organization and Agency descriptions.	Betsy Metcalf	EPA HQ	6/25/2012
23	1.0.7.2.2 Edit Office	Users may edit an Office by accessing the Edit Office screen from the Office Search Results screen. Users must have the Edit Office privileges to edit an existing Office record. Users may edit an Office by performing the following steps:	Laurie Kral	EPA, R10	
24	Figure 1.0-17 Notional Screen: Search Offices	Shouldn't the Offices and Agencies all be "child" records to the Organization?	Betsy Metcalf	EPA HQ	6/25/2012
25	Figure 1.0-23 Current ICIS Screen: View Submitted Process Logs	These examples should be more reflective of Air Program activity.	Betsy Metcalf	EPA HQ	6/25/2012
26	1.0.9.2 View Background Process Logs	I don't know if we have a summary list of potential Air Program Background Process Logs. I would assume that we could identify some processes based on the air program business rules. It is very difficult to understand these screens when only NPDES examples are used.	Betsy Metcalf	EPA HQ	6/25/2012

5.11 HELP AND USER SUPPORT

Module Being Reviewed	HELP AND USER SUPPORT
Name	TIER 3 REVIEW
Date	3/11/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
1	Overall	Would there be a way to search already existing change requests to see if the request has already been created by someone else (to avoid creating duplicative change request).	Nattinee Nipataruedi	State of Alaska, Division of Air Quality	3/22/2012	Comment accepted.	
2	Overall	Also, I'm not sure if this is the correct module to make this comment, but there exists in ICIS a form of 'Help' I have not yet heard discussed. It is when users enter invalid data (or omit data) when they click the Save button. This is Error reporting. It occurs when the User clicks the Save button and ICIS performs a data check against the Business Rules. If the data does not conform to the business rules, then ICIS returns an error message. In my opinion, this functionality falls under the Help module as 1) it is often the cause of users needing Help and 2) if done properly, can make providing Help to the User much more efficient. Currently, when data fails a business rule check and an error is returned, it displays a text message in the upper left portion of the screen about what the error is. It does not 1) provide recommendation to correct the error, or 2) direct the user to the field containing the error. For AFS-ICIS, it might be helpful to discuss these error reporting requirements.	Edward Voisin	US EPA/OECA	3/22/2012	Comment accepted.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
3	Overall	User Support should be defined as more than the process of tracking user change requests. The news and alerts to users should be outlined in this module. There should be a subscription process so users can define the categories of notifications they desire so they are not overwhelmed with information that doesn't mean anything to them.	Betsy Metcalf	EPA, OECA, OC	3/26/2012	Comment accepted.	
4	1.0 User Support						
5	1.0.1 Summary User Support Modernization in ICIS-AFS	Please ensure that there is a way to expedite defect corrections and show users the expedited track used to deal with these requests. Only System Administration should be able to identify an issue as a defect, and should be able to immediately begin work on correction without going to a Governance Board for prioritization.	Betsy Metcalf	EPA, OECA, OC	3/26/2012	Comment accepted.	
6	1.0.2 User Support Functional Requirements						
7	Table 1.0-1 ICIS-AFS User Support Requirements	The table is missing the key, please insure the key is included.	Betsy Metcalf	EPA, OECA, OC	3/26/2012	Comment accepted.	
8	1.0.3 User Support Data Requirements						
9	Table 1.0-2 ICIS-AFS Support Data Requirements	There is no example of how to contact EPA (i.e. phone, email, etc…) from the Help screen, but this is easy to add. There is no notional example of how Help will be incorporated at the field level. The notional example still maintains Help at the screen level. also, there is no notional example of how Policy information/documentation will be managed.	Edward Voisin	US EPA/OECA	3/22/2012	Comment accepted.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
10	1.0.4 User Support Business Rule Requirements						
11	1.0.5 User Change Requests						
12	Figure 1.0-1 Notional Design Screen: Submitting a User Change Request						
13	1.0.6 Subscriptions and Online Change Requests	The user should be notified, if desired, when ERT-provided stack tests have been added to facilities within their jurisdiction.	Betsy Metcalf	EPA, OECA, OC	3/26/2012	Comment accepted.	
14	Figure 1.0-2 Notional Design Screen: Add News and Alerts	No system indicator is present--the news alerts should indicate which system is affected. Users should be able to filter on news and alerts just for their system.	Betsy Metcalf	EPA, OECA, OC	3/26/2012	Comment accepted.	
15	Figure 1.0-3 Notional Design Screen: Edit News and Alerts	No system indicator is present--the news alerts should indicate which system is affected. Users should be able to filter on news and alerts just for their system.	Betsy Metcalf	EPA, OECA, OC	3/26/2012	Comment accepted.	
16	Figure 1.0-4 Notional Design Screen: Search news and Alert						
17	Figure 1.0-5 Notional Design Screen: News and Alerts List Screen						

5.12   REPORTS

Module Being Reviewed	REPORTS
Name	TIER 3 REVIEW

Date	6/4/2012
Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
1	Overall	Search in facility by specific unique identifier is required. Please ensure that the Reports Module will be within the ICIS application.	Chris Cote	Ventura County, CA	6/5/2012	Please incorporate comments.	
2	Overall	"Air Shed" is used prominently throughout this document and is not a term used by the compliance monitoring and enforcement air program. As the definition of what this Airshed is and how it relates to compliance monitoring and enforcement data is not provided nor immediately recognizable by the AFS community, it needs to be removed from the document.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
3	Overall	All CMS reports need to be grouped into one standard report with multiple tabs. If this is not done, then too many individual reports would have to be run to outline all aspects of the CMS review.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
4	Overall	It is extremely important to note that reports from the ICIS-AFS must not contain a row of data per air program reported. This flaw in the reporting from Legacy AFS has resulted in mistrust of the data and countless hours of data manipulation to remove data from reports in order to provide accurate counts of activities. If any compliance monitoring activity has more than one air program reported against it, it must still be counted as ONE COMPLIANCE MONITORING ACTIVITY with multiple air programs, and not a count for each air program. Example: A PCE was completed for SIP and NSPS purposes. It should count as ONE PCE, not TWO PCES.				Please incorporate comments.	
5	Overall	Every standard report needs to include both qualitative and quantative information.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
6	1 Reports Introduction	Table 1.1-1, ID 23 lists filtering on geographic report criteria. "Air Shed" is defined and not used by the AFS community. Please add City Name to the geographic filters.	Chris Cote and Betsy Metcalf	Ventura County, CA, US EPA	6/5/2012	Please incorporate comments.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
		Additionally, the last bullet of Requirements is open and unfinished. Please advise what this bullet is to say.					
7	2 Ad Hoc Reporting	Table 2.3-1: There should be one pre-built criteria for Tribal activity. Additionally, there should be a pre-built criteria for all activities regardless of who did them. If it will enhance report performance, the pre-built activities could be compiled by achieved date and arranged by fiscal year. The option for a user to create a report that provides State/Local Agency only values should be available. Please include discussion of the option of importing standard report criteria as a template for ad hoc reporting (ID 22 in Table 1.1-1).	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
8	2 Ad Hoc Reporting	Table 2.3-2: This is important, so bears repeating. It is extremely important to note that reports from the ICIS-AFS must not contain a row of data per air program reported. This flaw in the reporting from Legacy AFS has resulted in mistrust of the data and countless hours of data manipulation to remove data from reports in order to provide accurate counts of activities. If any compliance monitoring activity has more than one air program reported against it, it must still be counted as ONE COMPLIANCE MONITORING ACTIVITY with multiple air programs, and not a count for each air program. Example: A PCE was completed for SIP and NSPS purposes. It should count as ONE PCE, not TWO PCES.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
9	3 Standard Reporting	Standard reporting in the ICIS-AFS should not be limited to only those reports currently available within AFS, and should also include State Review Framework (SRF) reports and all national reporting.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
10	3 Standard Reporting	Table 3-1, Facility Name and Facility Identifier: It appears the word "more" should be added. The input criteria should not limit reports only to Default values. The option for a user to create a report that provides State/Local Agency only values should be available. Please include discussion of the option of importing standard report criteria as a template for ad hoc reporting (ID 22 in Table 1.1-1).	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
11	3.1 Critical Data Element Report	Table 3.1-2: Unsure what Tables X and Y are. For New CMS Report: Reason for changing CMS Category is not an MDR-is this a text field or drop down? There are too many CMS dates that can be interpreted as the same: CMS Origination Date, CMS Effective Date, CMS Start Date. These issues were identified in the comments provided on the CMS module, and a review of CMS has not been completed since. We need to scale back to the fields tracked by AFS now, and not complicate the process. These report outputs, values and rules cannot be approved as written. The Critical Data Element reports needs to indicate if MDRs are missing.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
12	3.2 Compliance Monitoring Strategy (CMS) Plan Report	3.2.2: CMS Origination Date, CMS Start Date, and CMS Effective Date are all describing the same thing. These terms are too confusing (I don't understand them, and if I am confused how is someone new to the reporting going to know the difference?) These items were brought up in the CMS Comments and an alternative from BAH has not been received for review.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
13	3.3 CMS Illogical Assignments Report	Table 3.3-2: BAH comments indicates assistance needed as default classification list has expanded, but actually CMS categories have expanded not the default classifications. Please clarify. Tables 3.3-1 and 3.3-2: The tables represent logic used for the report, but the table heading indicates "CMS Category Does Not Equal". It would be easier to understand if the heading indicated "Valid CMS Categories".	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
14	3.3 CMS Illogical Assignments Report	3.3.3 Report Criteria: Please add Historic CMS Year to the criteria, so that data quality reports can be run against previous fiscal year plans.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
15	3.3 CMS Illogical Assignments Report	Sorting of the report should be user supplied.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
16	3.4 Sources not Evaluated Within Negotiated CMS Frequency Report	3.4.2: This logic contradicts itself: first paragraph indicates CMS frequency is dictated by the CMS Category, second paragraph indicates that a negotiated CMS Frequency will be used. The logic will need to use the reported CMS frequency and not generate and frequency numbers based on the CMS Category.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
17	3.4 Sources not Evaluated Within Negotiated CMS Frequency Report	3.4.3: Criteria needs more description. Current reports use the CMS State Date or the Date of the Last FCE as the base for calculations. If there is no Date of Last FCE, then the CMS Start Date is used as the base for calculations. Then the CMS Frequency is applied to the base for calculations. The end of the fiscal year date is generated from the base calculation date plus the CMS Frequency. If no evaluation has been completed by this calculated date, the facility is OVERDUE for evaluation. Report needs the ability to identify those facilities that require evaluation within a fiscal year to avoid becoming OVERDUE.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
18	3.4 Sources not Evaluated Within Negotiated CMS Frequency Report	What happened to the CMS Indicator? We requested an indicator that can be easily retrieved if a facility is currently overdue for evaluation. I don't have any notes indicating that the indicator would be eliminated.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
19	3.5 Major Sources with No CMS Flag Report	Table 3.5-1: The logic is too complex, it really needs to be simplified. If a facility has a default value of major but does not have an active CMS category assigned, then it is missing from the CMS plan.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
20	3.5 Major Sources with No CMS Flag Report	Criteria needs to be simplified. Start Date does not need to be incorporated into this report. The report does not need a sensitive filter as no sensitive data is included in it.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
21	3.5 Major Sources with No CMS Flag Report	Table 3-5.3: Default Classification is listed twice. 3.5.4: This report does not need to be run against inactive CMS facilities, so this sorting is not necessary.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
22	3.6 Universe of Federally Reportable Facilities Reports	Table 3.6-1: This logic is flawed in that we never describe a facility with the potential to emit above the major threshold with controls (Synthetic Minor or Synthetic Minor 80%) as MINOR. Synthetic Minor sources are categorized separately from minor sources. A Part 61 NESHAP Minor facility should include only those facilities that have a default classification of minor with part 61 NESHAP air program applicability. We don't want these facilities duplicated in the Federally Reportable Facilities universe.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
23	3.6 Universe of Federally Reportable Facilities Reports	This report does not include minors with enforcement actions, nor active HPVs in the criteria logic. Additionally, the output should indicate if the source is included in the universe due to enforcement actions or active HPV. Enforcement actions (to include formal and informal) have to have occurred in the last five fiscal years.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
24	3.7 Sources within Nonattainment Areas	3.7.2: The logic is incorrect for this report. The report will show what facilities are contained within a nonattainment area REGARDLESS if the facility emits that pollutant or not. The report should indicate if the facility is emitting/permitted for the subject pollutant.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
25	3.7 Sources within Nonattainment Areas	Criteria is incorrect. No sensitive data is involved in this report, the "Include Sensitive Data?" is not necessary. EPA or State values are no longer valid and need to be eliminated.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
26	3.8 Activities Report	3.8.2 Report generation logic for all activities needs to include ONLY the END DATE. The air program does not count activities as concluded if only the Actual Start Date is within the designated time frame. Investigations will be counted as 1) Investigations Started but not concluded, and 2) Investigations Concluded. Stack Tests must be identified as coming from either the Electronic Reporting Tool or	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
		from the delegated agency, and this must be system generated. TVACC review counts are for those reviews completed during the designated time frame. It does not matter if the review is for a period of time outside of the designated time frame in the report criteria, as sometimes the review of these certifications is backlogged.					
27	3.8 Activities Report	3.8.3: End Date is the only field that will qualify these activities for inclusion in this report. Counts must not be completed by air programs reported per activity, but counted by activity. Air Programs-Table of Current Programs--needs to include operating subparts.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
28	3.8 Activities Report	3.8.3: Stack test reports need to designate where the data came from: Delegated Agency or ERT. Review Date needs to be included. If the report came from the ERT, a pass/fail for each parameter tested needs to be included. If the report is from the delegated agency, then the pass/fail indicator needs to be included for the test.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
29	3.8 Activities Report	3.8.4: TVACC Report needs to include review findings. Pollutants are not necessary on this report and need to be deleted.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
30	3.8 Activities Report	3.8.4: CEM reports are still a WIP and we are unable to identify all required fields at this time.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization	Date	Modification/Proposed Modification	Status
31	3.9 Facilities Reporting Violation	Final disposition of the Alleged Violation File (AFV) is still pending. It is anticipated that the AVF will become a replacement for the Notification of Violation action, and will be an enforcement sensitive record. It is anticipated that at this time, only HPV violations would require full linkage of discovery, addressing actions and resolution. Federally-Reportable Violations would require the reporting of the NOV or decision not to notice.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
32	3.10 List of Active HPVs/FRVs/Non-FRVs	Table 3.10-1: Please note the comments posted in ID 3 concerning Table 2.3-2. Note that final disposition of the Alleged Violation File (AFV) is still pending.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
33	3.10 List of Active HPVs/FRVs/Non-FRVs	Table 3.10-2: We had decided not to track individual violation types, but rather track each AVF as a case by AFV Identifier. The Violation Types are listed here with a Start and Stop Date and we do not want to track these violation types this way. The Air Program should have the applicable subpart provided. Discovery, Notice, Addressing and Resolving Action information will probably be reportable only for HPVs.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
34	3.11 Notice of Violation Report	Final disposition of the Alleged Violation File (AFV) is still pending. It is anticipated that the AVF will become a replacement for the Notification of Violation action, and will be an enforcement sensitive record. We will have to ensure proper programmatic policy is in place to support the increased records listed for new notification descriptions.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	
35	3.12 Enforcement Action Report	Table 3.12-1: Please note the comments posted in ID 3 concerning Table 2.3-2. Please include Air Program subpart with Air Program information. It is assumed that the Milestone Actual Date is the date that the Enforcement Action took place.	Betsy Metcalf	US EPA	6/5/2012	Please incorporate comments.	

5.13 ELECTRONIC DOCUMENTS

Module Being Reviewed	ELECTRONIC DOCUMENTS
Name	TIER 3 COMMENTS
Date	3/29/2012

Organization	U.S. EPA/OECA/OC/ETDD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By
1	**Overall**	Too many unknowns will make decision making on this module impossible. The modernization of AFS needs to keep a "place holder" for the sharing of electronic documents in design plans.	Betsy Metcalf
2	Overall	Submitting electronic documents needs to be optional for states/locals. We won't use documents in ICIS-AFS. If someone wants or needs documents from a state/local, we can provide them.

The process of providing documents is uncertain, burdensome, and resource intensive. The document refers to providing permits, inspection reports, maps, photos, etc., which implies that the states/locals will be providing this data. Most of this data isn't available electronically and would be time-consuming to create, copy, transmit, manage, and store.

The effort will not improve air quality or support district objectives.

In addition, our network can't connect to AFS because of issues with the county firewall. As a result, we use a dsl computer, which is outside our network, to enter data into AFS. I don't know if we will be able to access ICIS. I guess we'll find out when the system becomes available.

One concern we have is the scale of the project. A large area of uncertainty is FRV's. If all violation at minor facilities become reportable, rather than just Tier 1 violations, the amount of work involved will increase substantially. | Chris Cote |
| 3 | Introduction | The introduction says users can access permits, inspection reports, maps, photos, etc. These documents are maintained by states/locals, which implies that they will be providing this data.

Our non-Title V permits are not available electronically. The equipment and permit conditions reside in a data system, but they are only assembled when they are printed. The Title V permits might be considered electronic in that they consist of 10 - 12 Word documents. These would probably have to be saved and transmitted as .pdf's.

There are many questions about the scope of the project, how the documents would be transmitted, managed, and stored.

There doesn't seem to be any benefit for air quality or the district in this effort. | Chris Cote |

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By
4	Regulated Community Documents	The district is not currently receiving electronic documents from the regulated community. I agree there are questions about how and where the documents, if collected, will be stored.	Chris Cote
5	Electronic Forms and Metadata	If the documents will be submitted via XML, there has to be a standard. Has a standard been developed? Is it available? The collection and use of metadata will require a separate tool? It seems you are saying that this would be a system outside of ICIS for facilities to submit data to and this interface would send data to ICIS. This sounds like another big project.	Chris Cote
6	Regulatory Authority Documents	We don't have a document repository so there isn't a place to store or access documents. Manually uploading documents would be labor intensive. The district's network cannot currently connect to AFS due to firewall issues. I don't know if there will be issues with ICIS. The district's current system is not CROMERR compliant. The presence of the documents will not benefit the states/locals. We won't use documents in ICIS-AFS. The process of providing/managing documents is uncertain and will be resource intensive. The effort will not improve air quality or support district objectives. Document size could also be an issue. It sounds like the documents would be submitted via email. Email restricts the size of pdf files. The Title V documents have 10 to 12 chapters ranging from 2 to 40 pages. I'm not sure how many pdf's files would	Chris Cote

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By
7	Regulatory Authority Documents	No decisions have been on how documents from regulatory authorities will be managed. Regulations have not been promulgated to require the process. At this point, there are no plans from EPA to require delegated agencies to manually upload any data. Electronic reporting of information is expected to save all agencies time and money. The modernization of AFS needs to keep a "place holder" for the sharing of electronic documents in design plans.	Betsy Metcalf
8	SRS Requirements	5.16.2 - This section says the system will allow users to "tag" documents. Does this mean the states/locals will have to link documents to the metadata? 5.16.4 - The district doesn't have document storage so it can't be shared. Even if we had document storage, I doubt the district would be able to share due to firewall issues.	Chris Cote
9	Documents Stored Directly in the Database (1)	It seems that the metadata from the document would be used to create an action in the ICIS-AFS action table for the report. This record would then have the facility ID, date of the report, and type of report (as the action type). It would also have the upload date and uploaded by from the person's ICIS-AFS ID.	Chris Cote
10	Documents Stored Directly in the Database (2)	If the idea of having electronic documents in the system is to have them available for the state/local staff to use, there doesn't seem to be much point to this project. The district's documents are already available for our use. Making electronic copies doesn't serve a purpose. Under challenges, the list includes versioning. It's true that permits, inspection reports, and other documents will have different versions. Keeping the documents up to date will be a major issue in managing and updating the system.	Chris Cote
11	Documents Stored Directly in the Database (2)	If budget, resources, and regulation allow, this will be the best option for the users of the database. With documentation readily available, smaller agencies with no ability to create their own document repositories will definitely benefit.	Betsy Metcalf
12	Commercial Document Management System (1)	Until the regulations and requirements for electronic documents are available, this option cannot be completely evaluated.	Betsy Metcalf
13	Document Access through Links (1)	It is believed that even though there are many drawbacks to this option, the implementation of the system can at least ensure records are available for URLs in order to provide access to important documents.	Betsy Metcalf

5.14 CRITICAL REQUIREMENTS REVIEW COMMENTS

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
1	General	Graphical User Interface	John stated that the pull-downs for citing Federal Statutes – having state and local/write in option is critical.	John Borton, Region 9
2	General	Graphical User Interface	The font size needs to increase in ICIS-AFS.	John Borton, Region 9/Betsy Metcalf, EPA Headquarters
3	TV ACC	Data	Chris asked why the Permit ID is an MDR for a TV ACC record.	Chris Cote, Ventura County, California
4	General	Graphical User Interface	Ken would like the option to just type in the AFS codes in drop-down fields instead of having to find values in the list.	Ken Mangelsdorf, South Coast
5	General	Graphical User Interface	John suggested that drop down boxes will contain a large number of values and it would not be intuitive if it's ordered alphabetically. He would like a string search which offers different options in finding data in a drop down box.	John Borton, Region 9
6	Enforcement Action	Data	The Enforcement Action Linking screen is missing additional information about the Enforcement Action record on the header.	Betsy Metcalf, EPA Headquarters
7	Reports	Standard Reports	Matt would like to see all the linked activities/key actions related to a Facility, for example a perpetual violator, a list of eligible activities to be linked. Additionally, Matt would like to see pathways/list of all alleged violation files.	Matt Chaifetz, Indiana

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
8	Enforcement Action	Data	Louvinia asked how users would enter data for the activities without enforcement actions associated to them.	Louvinia Madison, Region 3
9	Enforcement Action	Data	Laurie asked if there are a maximum number of informal enforcement records that users can enter on one case/link to an action.	Laurie Kral, Region 10
10	Enforcement Action	Data	Cindy asked what the Select checkboxes are for on the EA eligible activities screen. Additional she inquired about the Select Type drop down box.	Cindy Troupe, Oregon
11	General	Contacts and Addresses	Dennis asked how ICIS-AFS will handle the user role if an Inspector from State moved to HQ, how his contact information would be updated.	Dennis Murphy, Delaware
12	General	Contacts and Addresses	Ken asked if contact information is required.	Ken Mangelsdorf, South Coast

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
13	General	Contacts and Addresses	John asked if all users will have the ability to add/edit new contact information. State/Locals Agencies expressed the need to add/update Contacts and Addresses.	John Borton, Region 9
14	General	Comments	Dennis inquired if users can over-ride/change comments entered by other users.	Dennis Murphy, Delaware
15	Reports	Ad-Hoc Reports	Jason requested a report to show where a Pollutant is not on the Facility Record.	Jason Swift, EPA Headquarters
16	General	Action Linking	Betsy would like the "Link to Report" renamed to "Link to Document in Electronic Document Repository"	Betsy Metcalf, EPA Headquarters
17	Search	Facility	Dennis asked if there is a way on the Facility Search screen to automatically default to specific geographic criteria/user id/privileges – Region, LCON, etc.	Dennis Murphy, Delaware

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
18	Search	Facility	Dennis and the group requested adding the Region Registration Number to the search screen.	Dennis Murphy, Delaware; Laurie Kral, Region 10
19	Search	Facility	Dennis and the group requested that the County should be a drop down and State be selected first and then the County drop down would be based on the State.	Dennis Murphy, Delaware
20	Search	Facility	Dennis and the group requested the Zip Code be populated based on the City.	Dennis Murphy, Delaware
21	Search	Facility	Laurie asked to add a checkbox for Tribal Ownership.	Laurie Kral, Region 10
22	Search	General	Ken requested the ability of a user to save search defaults or a "last used" option.	Ken Mangelsdorf, South Coast
23	General	Data	Louvinia asked if records are deleted, can they be restored.	Louvinia Madison, Region 3
24	General	Graphical User Interface	Louvinia asked if the Copy function duplicates the current record and if users can edit the new copied record.	Louvinia Madison, Region 3
25	Facility	Data	Betsy wanted to ensure that all Activities are listed in the Summary section on the Facility Tab.	Betsy Metcalf, EPA Headquarters

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
26	TV ACC	Data	Chris doesn't understand why Permit ID is an MDR for TV ACC records.	Chris Cote, Ventura County, California
27	Permit	Unique Identifiers	Cindy asked what the minimum number of characters is for Permit ID.	Cindy Troupe, Oregon
28	General	Unique Identifiers	John asked what if other State or Region uses the same Unique Identifier since they do not include geographic information.	John Borton, Region 9
29	General	Unique Identifiers	John wanted to know if Key values can be modified for a Facility for AVF.	John Borton, Region 9

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
30	Batch	Universal Interface	Chris asked if the Merge function would be brought forward	Chris Cote, Ventura County, California
31	Batch	XML	Cindy asked what if users don't want to overwrite the existing data using the Replace transaction.	Cindy Troupe, Oregon
32	Batch	Definitions/Verbage	Clarify language for Table 2.3-1 for Unique Identifier Generation and History Transaction: Batch Transaction ID	Betsy Metcalf, EPA Headquarters
33	General	Export	John expressed that the output transactions will be vital since Ken from South Coast exports much of his data from AFS.	John Borton, Region 9
34	System Administration	User Roles/Functios	Christy asked if there will be read-only roles and if there is a limit on the number of users for each State or Region	Christy Monk, Alabama
35	Batch	Performance	There are no requirements for batch processing/performance standards	Betsy Metcalf, EPA Headquarters
36	Batch	Definitions/Verbage	Define the term Full Batch and Full Node.	Betsy Metcalf, EPA Headquarters
37	Batch	Reports	The Batch Accepted Audit Report should not have an Error Message column header; the column header should only be "Warning Message".	David Meredith, EPA Headquarters
38	General	Unique Identifiers	John asked if Regions can define their own Unique Identifiers.	John Borton, Region 9
39	General	Error Messages	"What is your lease favorite mainframe error message?"	BONUS QUESTION RESPONSE

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
40	Facility	Air Program	Ken asked if an Air Program is deleted, will it delete the activities and Facility associated to the Air Program.	Ken Mangelsdorf, South Coast; Betsy Metcalf, EPA Headquarters
41	Facility	Pollutant	Change "State Classification" to "Delegated Agency Classification" Minor is below an SM in the pollutant hierarchy.	Betsy Metcalf, EPA Headquarters
42	Facility	Data	Laurie wants to ensure that the Lat/Long data are not overwritten by FRS Lat/Long data. Additionally, the UTM data fields should be added to a Facility record.	Laurie Kral, Region 10
43	Facility	Data	Facility should be 80 characters long. Betsy proposed that the Facility Name should include Ownership Name. Ken Mangelsdorf proposes using the Dunn and Bradstreet naming convention.	Betsy Metcalf, EPA Headquarters
44	Facility	Air Program	Add Air Program Subpart Operating Status to indicate that the subpart can be shutdown.	Betsy Metcalf, EPA Headquarters
45	Facility	Data	Secondary SIC should not be System Required	Betsy Metcalf, EPA Headquarters
46	Facility	Data	Change County to have Code followed by County Name	Betsy Metcalf, EPA Headquarters
47	Permit	Definitions/Verbage	Laurie requested to change the "Major Modification Issued" to "Significant Modification Issued."	Laurie Kral, Region 10
48	Permit	Data	Laurie wanted the ability to add multiple Permit Tracking Events.	Laurie Kral, Region 10

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
49	Permit	Data	Instead of list all the Events and Dates, should allow users to select Events from a drop down and then enter Dates.	John Borton, Region 9
50	Permit	Data	John requested separate data element that tracks modification numbers.	John Borton, Region 9
51	Compliance Monitoring	Data	Participants voiced concerns with PCEs being MDRs in the new system. It will create double data entry and data burden for the Delegated Agencies.	Carol Booney, South Carolina Ken Mangelsdorf, South Coast Chris Cote, Ventura County, California
52	Compliance Monitoring	Definitions/Verbage	Participants voiced concerns with PCEs being MDRs in the new system. It will create double data entry and data burden for the Delegated Agencies.	Betsy Metcalf, EPA Headquarters
53	Compliance Monitoring	Data	Investigation Actual End Date is an MDR for State while Actual Start and End Dates are MDR for Federal.	Jason Swift, EPA Headquarters
54	Compliance Monitoring	Data	Betsy clarified that Information Requests are Federal users only. Information Requests are optional data entry.	Betsy Metcalf, EPA Headquarters
55	Compliance Monitoring	Graphical User Interface	Betsy requested that the Compliance Monitoring Date header should include an asterisk (*) to indicate that at least one date is required data entry.	Betsy Metcalf, EPA Headquarters
56	CMS	Definitions/Verbage	Chris requested clarification on the CMS Indicator being the frequency.	Chris Cote, Ventura County, California

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
57	CMS	Data	John asked what the CMS Origination Date would be for the existing AFS CMS data during migration.	John Borton, Region 9
58	CMS	Data	Jason wanted to ensure that users can select a CMS Category that does not map to that parent Facility's Classification.	Jason Swift, EPA Headquarters
59	CMS	Data	Ken proposed that if a Facility is closed, then the CMS plan should automatically set to inactive.	Ken Mangelsdorf, South Coast
60	CMS	Definitions/Verbage	David requested changing 9/30 to 10/1 where there's a reference to 9/30 in the CMS section.	David Meredith, EPA Headquarters
61	TV ACC	Data	Laurel suggested that the Permit ID and Review Period Dates should be listed in the Significant Change slide.	Laurel Carlson, Massachusetts
62	TV ACC	Graphical User Interface	Ken recommends changing the Review Period Start/End Dates to Report Period Start/End Dates.	Ken Mangelsdorf, South Coast
63	TV ACC	Data	Ken wanted to ensure that Facility Reported Status is not an MDR.	Ken Mangelsdorf, South Coast

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
64	TV ACC	Data	Jason suggested that both Due Date and Received Date should be MDRs on a TV ACC record.	Jason Swift, EPA Headquarters
65	TV ACC	Graphical User Interface	John expressed a preference for Certification data centralized on the top of the screen with Review data below.	John Borton, Region 9
66	TV ACC	Data	Kayra asked if Permit data is required since the Permit ID is required on the TV ACC screen.	Kayra Johnson, Mississippi
67	Stack Test	Data	Betsy wants to ensure that the default blank status only applies to electronic Stack Test records, not user entered ones. Also, Test Results should be system required and programmatically required.	Betsy Metcalf, EPA Headquarters
68	Stack Test	Data	Laurel clarified that Stack Test Reviewers are not usually AFS users. Also, State users will not always use the ERT to submit electronic Stack Test data therefore ICIS-AFS should allow users to enter Stack Test records manually.	Laurel Carlson, Massachusetts

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
69	Stack Test	Data	Laurel requested changing "Pollutant Tested" to "Parameter Tested" with a "Reason for Failure" dropdown, as many of their failed stack tests/enforcement actions are not due to pollutant failures.	Laurel Carlson, Massachusetts
70	Stack Test	Data	Chris suggested the Stack Test Reviewer be defaulted to the user who is entering the data.	Chris Cote, Venture County, California
71	Stack Test	Data	Chris recommends removing the default from Conducted By, adding Owner/Operator as an option for Conducted By, and Conducted By should not be system required or programmatically required.	Chris Cote, Venture County, California
72	Stack Test	Process	Betsy suggested that Stack Test electronic data imports should not delete any data in ICIS-AFS and ICIS-AFS should ensure that there are no duplicate data between the imported and manually entered data.	Betsy Metcalf, EPA Headquarters
73	Stack Test	Policy	John would like to have an Opt-in, Opt-out feature for choosing to use electronically imported Stack Test data.	John Borton, Region 9
74	Stack Test	Policy	Betsy will put together a Stack Test Issues Paper to document how Stack Tests are counted and the types of information that will be tracked.	Betsy Metcalf, EPA Headquarters
75	Reports	Export	Dennis asked if commas in the comments field would corrupt export for Comma Separate Value (.CSV) files in the reporting tool to be used in the modernized system.	Dennis Murphy, Delaware

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
76	Reports	Technology	Ken voiced concerns regarding using Business Objects as the reporting tool in the modernized system. He noted that Business Objects will not allow users to extract/retrieve any data if relationships have not been established in the database.	Ken Mangelsdorf, South Coast, California
77	General	ERD	Ken asked if an ERD will be provided.	Ken Mangelsdorf, South Coast, California
78	Reports	Data Quality	John requested reports include all Enforcement Actions, not just Formal or Informal.	John Borton, Region 9
79	Reports	Definitions/Verbage	David added that a significant change for the modernized system is the ability for users to schedule reports. Additionally the output can be emailed to predetermined individuals, even if they are not AFS users.	David Meredith, EPA Headquarters
80	Reports	Definitions/Verbage	Chris noted that the following Alleged Violation File and Enforcement Action linkages should be added: · Information Requests · Title V Annual Compliance Certification · Continuous Emissions Monitoring · Stack Test	Chris Cote, Ventura County, California
81	Reports	Format	John asked about the width restrictions of reports in the modernized system.	John Borton, Region 9

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
82	General	Data Quality	John highlighted the need to ensure programs and pollutants are not duplicated. Betsy added where multiple selections were allowed on the Action, this was an issue, including: Violation Type codes, National Initiatives; Pollutants.	John Borton, Region 9; Betsy Metcalf, EPA Headquarters
83	Facility	Data	Chris requested a pre-built filter/prompt for Owner/Corporate Entity	Chris Cote, Ventura County, California
84	Reports	Data Quality	Ken expressed a desire for report criteria to be defaulted based on the specific geography associated with the User profile or user-defined default.	Ken Mangelsdorf, South Coast, California
85	Reports	Standard Reports	Betsy requested that Standard Reports be listed at the beginning of the Reports module section followed by Proposed Standard Reports.	Betsy Metcalf, EPA Headquarters
86	Alleged Violation Files	Data	Magen asked if AVF entry could be done parallel to the entry of an HPV record.	Magen Holloway, Bay Area, California
87	Alleged Violation Files	Data	Louvinia asked for clarification of the impact on timeliness.	Louvinia Madison, Region 3
88	Alleged Violation Files	Data	Chris asked for clarification on changing an HPV to an FRV or vice versa.	Chris Cote, Ventura County, California

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
89	Alleged Violation Files	Data	Betsy indicated the need to link incidents such as a fire at a Facility, Facility bankruptcy, etc. Users expressed concern of incorporating this information in comment fields, as comments are difficult to search/retrieve by.	Betsy Metcalf, EPA Headquarers
90	Alleged Violation Files	Data	Magen cited the difficulty of having Air Program as a Minimum Data Requirement (MDR) as the state and local agencies do not cite Air Programs using the Federal Codes.	Magen Holloway, Bay Area, California
91	General	Data Quality	Laurel wanted to ensure that a mechanism would be provided to allow batch users to submit records with less than MDR data, and users could go back in manually to update the records (i.e., pollutant and program) to allow for delegated agency systems that do not capture the required data.	Laurel Carlson, Massachusetts
92	Compliance Monitoring	FCE, PCE, Investigation, Information Request	It must be specified that for each State Investigation there should also be an LCON Investigation.	Betsy Metcalf, EPA Headquarters
93	Alleged Violation Files	Data	The flag priority should be: - Active (aka Unaddressed) HPV - Noticed [pending HPV policy] HPV - Addressed HPV - Unresolved FRV - Resolved HPV	Betsy Metcalf, EPA Headquarters
94	Enforcement Action	Definitions/Verbage	Jason recommended the following changes be made: - Remove the word initiated for the Air/AFS documentation - Change Final Order to Final Action	Jason Swift, EPA Headquarters

ID	Module	Functional Category	Comments and Questions	Name and Affiliation
95	General	Requirement	In previous discussions it was determined that users would like to incorporate information about Special Environmental Projects (SEP). Booz Allen requested clarification for the data requested for a SEP.	Amy Berkowitz, Booz Allen Hamilton

5.15   INTERIM UPDATED SRS – VERSION 1.0 COMMENTS

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
1	1.0 Introduction	Replace 'Air' w/ 'Clean Air Act (CAA) stationary souce' in 2nd line of document.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
2	1.0 Introduction	It is clear that this program is being designed to support a huge increase in data requirements from the current MDRs. The document, especially the Introduction and assumptions sections, repeatedly states that many new requirements are being added to support expected CAA and other regulation changes that are now in process or expected in the near future. In general, this new ICIS-AFS system will require a significant increase in burden, ten-fold or more increase, to collect and report on the new requirements. There is a 'new' category of data collection called "System Required" data that will be required on the data entry screens in order to complete and save the data just entered. If this is required data necessary for us to complete the data entry, then it is by definition MDR data. It is not clear that the MDR listing will be updated to reflect these new requirements of whether they will just be necessary and left without ICR notification.	Ken Mangelsdorf	South Coast AQMD
3	1.0 Introduction Part 1	This has been a long process and a lot of people have worked hard on this project. We have made some progress and there are still some outstanding issues. We appreciate that it is difficult to design a system or write a procedure that is broad enough to cover all possibilities and allow for flexibility in the various air programs. The fundamental issue that underlies data reporting issues in AFS or ICIS-AFS is the difference between EPA and the state/local/tribal programs and regulations. At first the problem seemed to be differences in terminology. Terminology issues have been discussed many times and have never been resolved. But, that's just part of the story.	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
		EPA has made it clear that they want to quantify actions from across the country in terms of the Clean Air Act. These are the regulations that EPA works with and that makes sense for them. However, many states/locals/tribes have their own regulations because state legislatures and other governing bodies created the agencies to regulate air quality. Federal, state, local, and tribal laws, rules and processes require each agency to operate within their own framework. We all use regulations to improve air quality but we use regulations that were developed to address sources in our state/local/tribal jurisdictions. EPA refers to the Clean Air Act, while state/local develop rules and regulations to meet air quality standards. As regulators, we spend a lot of time discussing how particular regulations apply to facilities. Decisions are made based on definitions. It is difficult for states/locals to work with terms and definitions that don't relate to our compliance/enforcement programs.		
4	1.0 Introduction Part 2	The main problem with reporting data to a national system is translating from state/local/tribal actions/terms/regulations to EPA actions/terms/regulations. This translation is a challenging process and is the core of inconsistency in the national data. If a state/local/tribe conducts inspections or takes enforcement actions that don't have federal equivalents, then there is a dilemma. Agencies don't have the option to accurately report their compliance or enforcement actions, so they try to choose equivalent actions from the available options. But, the options that are available may not be equivalent. One way that EPA could support the states/locals/tribes with this challenge is to define EPA terms in a functional way. Clear functional definitions would allow the states/locals/tribes to choose EPA actions that are closer to the actual actions. Some examples of problem terms are "Notice of Violation" and "Administrative Order". Working on terminology may be a way to overcome the roadblocks that occur when we use different terms to mean the same thing or the same term to mean different things.	Chris Cote	Ventura County APCD
5	1.1 Purpose			
6	1.2 Assumptions and Constraints	It became clear during the vMeeting that the Tier 3 workgroup has been working with the design side of EPA on AFS Modernization and we (the states/locals/tribes) would like to discuss issues with the program side of EPA. It makes sense to design a system that will meet the needs of both EPA and the state/local/tribal agencies. We need to have a discussion of what data is really needed and why. How do we find out who the program people are and how do we meet with them? It would be more efftiicient to discuss and clarify the needs before the new system is built.	Chris Cote	Ventura County APCD
7	1.2 Assumptions and Constraints	Delete last sentence in Table 1.2.1 - Permits row.	David Meredith	EPA/OECA/OC/ETDD/DSIMB

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
8	1.2 Assumptions and Constraints	Apparently the assumption that the only 'bean' to be counted was the FCE was incorrect. It appears that the FCE, PCE, Stack Test info, TV ACCs all have an equal value. That is not true in the legacy system and was not mentioned or discussed in the Tier 3 sessions. In addition, EPA assumes that all states/locals conduce business the same way as EPA does. EPA continues to fail in the understanding that States and Locals in the AIR world DO NOT operate in the same manner as EPA. Yes, we do enforce and regulate facilities in support of the CAA, but we DO NOT do this directly. It has been done this way for decades prior to the formation of the EPA. Each State/Local agency has their own set of rules and regulations that govern all their actions, permitting, compliance and enforcement. For the locals, they also have state regulations that may be required to enforce. These local rules and regulations, especially the SIP approved versions, are the driving force to our compliance and enforcement activities and indirectly implement the CAA. In the event that we do not have an equivalent local regulation, we will then cite the federal rule, but this is the exception not the rule. PLEASE also note that we permit equipment and NOT pollutants. Our rules are generally concerning specific equipment or processes and thereby we, indirectly, regulate the emissions specific to that equipment. In most of the locals across the nation, especially in CA, this is how we accomplish our emission reduction goals. It is also how we structure our data bases to track and provide information to our staff to ensure compliance with local rules and regulations.	Ken Mangelsdorf	South Coast AQMD
9	1.2 Assumptions and Constraints	Add this bullet to the assuptions, "Align with the Agency's future Enterprise Architecture for IT resouces including, data architecture, applications architecture, technololy architecture, and security architecture where ever possible."	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
10	1.2.1	CEM/EER entry in Table 1.2-1: change "occurred" to "occurs" AVF entry in Table 1.2-1: Please add/change definition to, An AVF "is one web screen within ICIS-AFS that will …..or closeout memos per facility"	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
11	1.2.1	Table 1.2-1 · Please strike the third sentence in the Facility/Permits/Description block. · Enforcement Actions/Informal Actions/Description, please add "of a problem/issue. Additional guidance concerning NOV definitions is expected to expand definitions."	Betsy Metcalf	EPA, OECA, OC
12	1.2.1	Figure 1.2-1: AFS has not required a two-step reporting for formal actions, state/local agencies will be reporting the Final Actions. Please do not indicate Final Orders in a separate box below Formal Actions, it will lead the reporters to believe that there will be another step for reporting.	Betsy Metcalf	EPA, OECA, OC
13	1.3 Document Overview	Make sure to update the list of modules. It seems some are missing.	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
14	1.3 Document Overview	Section 1.3: Appendix C is not included in this document.	Betsy Metcalf	EPA, OECA, OC
15	2.0 Data Entry Overview			

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
16	2.1 Web Approach	Section 2.1.1.1 has typo. Should be "…and allow user to trace the path…" The currect version uses the word "can" instead of "to".	Christy Monk	Alabama DEM
17	2.1 Web Approach	Clarify/clean up 2nd sentence in 2.1.1.1	David Meredith	EPA/OECA/OC/ETDD/DSIMB
18	2.1 Web Approach	In general, the new 'web approach' is significantly more burdensome on states/locals. The data requirements, in spite of EPAs continued statements that there are no new MDRs, will require significant changes to local data structures, data mining/extraction techniques and significantly more QA and review. it will also require some training to acquaint our inspectors with the requirements for data collection.	Ken Mangelsdorf	South Coast AQMD
19	2.1 Web Approach	Do you have a figure for a notional screen shot of an FE&C home page? It would be good to have one included.	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
20	2.1.1	Section 2.1.1: Where will Wood Stoves be housed? It is not clear in this section.	Betsy Metcalf	EPA, OECA, OC
21	2.1.1	Figure 2.1-2: I am unclear where the Notional Air Home Page for EPA Users will be. Does this screen show up within FE&C, or does the Federal User go to the AFS page?	Betsy Metcalf	EPA, OECA, OC
22	2.1.1	Figure 2.1-8: The Pollutant Table's valid values for CAA should be easy to search—either by 5-digit pollutant codes that exist in AFS or by the first 5 letters in the compound's name.	Betsy Metcalf	EPA, OECA, OC
23	2.2.1	Section 2.2.1, Linking: Bad example listed in paragraph one. Better example: Multiple PCEs lead up to a completed FCE.	Betsy Metcalf	EPA, OECA, OC
24	2.2.1	Figure 2.2-1: Bad example in the screen. The first HPV under the Linked AVFs is listed as sensitive. A resolved HPV would never be sensitive. Please remove the sensitive indicator to make this data more understandable. The Information Request Letter is not an informal enforcement action. It this is a clash with FE&C, then someone has to make a call on whether or not it will be remain so after integration.	Betsy Metcalf	EPA, OECA, OC
25	2.2.1	Figure 2.2-2: Please add the activity that this information is being linked to in the top bar. Please make if prominent and easy to read.	Betsy Metcalf	EPA, OECA, OC
26	2.2.1	Table 2.2-1: For Alleged Violation Files and Enforcement Actions: Stack Tests, TV ACCs, and CEMs all could be linked to these entities.	Betsy Metcalf	EPA, OECA, OC
27	2.1.1.1	Second sent.: Change "can" to "to"	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
28	2.1.1.3	Figure 2.1-8: Screen should be titled, either Compliance Monitoring Search Criteria or Search Compliance Monitoring	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
29	2.2 Common Functions	Figures 2.2-1 and 2.2-2 are examples of how hard it is to read the identifying information in the medium blue and dark blue areas in the upper left of the screen. The text in these areas should be larger and possibly bold.	Christy Monk	Alabama DEM
30	2.2 Common Functions	2.2.1 Linking, 4th line: Poor example. Stack tests are PCEs! Maybe a failed stack test would accelerate the timeframe that a FCE was completed. Also, clean up/clarify the following sentence beginning with 'To support...' Also clean up/clarify second bullet just below beginning 'Ability to...' On page 30, at end of Table 2.2.1, add TV ACCs, Stack tests, CEM/EER to Enforcement Action row.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
31	2.2 Common Functions	Need to discuss further the default settings applied by the login security role. There are several references to click on links on pages but links are not shown on the pages discussed.	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
32	2.3 Batch Electronic Data Submission	Change "ICIS-AFS will use existing XML functionality to transfer data..." to "ICIS-AFS will use the same XML-based functionality as the existing NPDES module to transfer data" Change "and sends the processing status back to CDX." to "and sends the processing status and results back to CDX for submitters to download the results."	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
33	2.3 Batch Electronic Data Submission	Figure 2.3-1 Change all occurrences of "user" to "submitting party" CDX does not send user notification of status nor can the user view them online. Submitting party requests the status from CDX and downloads the results from CDX either through their node or using a web form.	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
34	2.3 Batch Electronic Data Submission	We would like to have the schema as soon as it is available to determine what changes will need to be made to our current data system for batch uploads.	Carol J. Boney	South Carolina
35	2.3 Batch Electronic Data Submission	Table 2.3-1, Data Validation row: We want initial data validation to be done via CDX, before entry into ICIS-AFS. Same table, Performance row: No requirement is stated. Instead there is an irrelevant statement. Table 2.3-2, first row: Need to capture requirement for CDX to be able to perform initial data validation prior to submission to ICIS-AFS. Also, rows 2 & 6 of that table has blank 2nd and 3rd columns. Why? On page 36, last sentence in 'Interface Between User and CDX', If the user must find the cause of the failure, this must be very easy for our users, else data quality will suffer. On page 37, 2nd paragraph, ist sentence,reference to 'Full Node'. Please clarify. Also, I don't understand the following sentence and it's reference to future Exchange Network services. End of 2.3.5: Explain 'value pair'. Top of pg 39: First paragraph is hard to understand / too jargony. Figure 2.3-3: Make up AFS examples for the following three sections. On page 43: Need only Warning messages. Please don't include the term 'error'. Reverse the comment for page 44: No reference to warning messages is needed.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
36	2.3 Batch Electronic Data Submission	General comment: MS is a batch state, and our concern is that we won't be able to batch all the data we currently send as batch into the new system. For batch transactions, if a transaction fails because of some (not all) records submitted; will the entire set of records have to be resubmitted, or just those that failed? Would be helpful if only the portion that failed has to be resent.	Kayra Johnson	MS DEQ
37	2.3 Batch Electronic Data Submission	There has been no discussion of how XML will work for batch uploads. There are many references to XML, but to those unfamiliar with XML and the user system requirements, XML structure, methods of creating XML files, etc. it is still a mystery. There continues to be a misconception of exactly what 'meta data' is and what it can be used for. The NISO web site defines meta data as: *Metadata is structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource. Metadata is often called data about data or information about information.* (http://www.niso.org/publications/press/UnderstandingMetadata.pdf) I know that I have been mentioning this fact many times over the last several years, but the discussion always returns to the fact that the information uploaded to the ICIS database will be taken from the meta data, which is inherently incorrect. It gives a false impression. There will need to be some extensive discussion and training with regards to meta data and especially XML.	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
38	2.3 Batch Electronic Data Submission	Edit function that is currently in use through AFS batch should be carried forward into ICIS-AFS. Either that or create a QA environment so that critical errors can be checked then corrected before the batch data is committed into production. Either that or multiple uploads might happen for a specific data set to correct a handful of errors.	Nattinee Nipataruedi	Alaska
39	2.3 Batch Electronic Data Submission	Table 2.3-1: Data Validation is to be performed in ICIS-AFS. This is where the UI capabilities need to be introduced into the CDX Schema Validation process. This has not been discussed but needs to be built into the process before the data gets to ICIS. The Create Delete Transactions indicates ICIS-AFS will provide user interface pages to delete records. Shouldn't this be screens vs pages?	Betsy Metcalf	EPA, OECA, OC
40	2.3 Batch Electronic Data Submission	Performance of the batch process is something that needs to addressed in this document. The example given in table 2.3-1 indicates processing time for a NPDES transaction which has no correlation to AFS transactions. It would be more meaningful to say that a large state submitting transactions would see the data within the production database within 4 hours. Currently, our large batch submittals are processed overnight. Overnight processing would not be an improvement for them. If we could improve data transfer by making sure their data is available in the database within 4 hours of submittal, we could provide an improved process of reporting.	Betsy Metcalf	EPA, OECA, OC
41	2.3 Batch Electronic Data Submission	Section 2.3.4: Spell out NAAS. What is this?	Betsy Metcalf	EPA, OECA, OC
42	2.3 Batch Electronic Data Submission	Page 37: The description for Figure 2.3-2 indicates batching data through use of the Full Node. Please do not use these descriptions without full discussion about what a "Full Node" is. What are the alternatives? Half Node? Partial Node? Please be clear.	Betsy Metcalf	EPA, OECA, OC
43	2.3 Batch Electronic Data Submission	Page 38, XML File Submission to CDX using CDX Web Application, uses that Full Batch reference again with the term "value pair". Again, vague, unknown to the AFS community as we are unfamiliar with the XML process.	Betsy Metcalf	EPA, OECA, OC
44	2.3 Batch Electronic Data Submission	Please try to use a CAA Federal Enforcement Action for the XML Instance File. It would mean much more to the users reading this document that a NPDES example.	Betsy Metcalf	EPA, OECA, OC
45	2.3.1	Change "ICIS-AFS will use the industry standard XML batch format" to "ICIS-AFS will use the industry standard XML batch format as required by the Exchange Network" Change "The agencies themselves can provide the unique keys providing a more streamlined process than Legacy AFS" to "The agencies themselves will be expected to provide the unique keys providing a more streamlined process than Legacy AFS" Change "This could be done for FCEs, because the business rules allow submittal of only one FCE per day per facility" to "This will be done for FCEs because the business rules allow submittal of only one FCE per day per facility	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
46	2.3.3	What is "import transaction history"? Do you mean track submission history? Change "The system shall utilize standard Exchange Network Web Services to communicate between ICIS and CDX." to "The system shall utilize Web Services to communicate between ICIS and CDX." Change "The system shall sort the transaction types and submissions inside a batch transaction using a modified ICIS sorting algorithm" to "The system shall sort the transaction types and submissions inside a batch transaction using a modified ICIS sorting algorithm to preserve data integrity by ensuring data is processed in the proper order "	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
47	2.3.4	Change all occurrences of "user" to "submitting party" CDX does not send user notification of status nor can the user view them online. Submitting party requests the status from CDX and downloads the results from CDX either through their node or using a web form.	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
48	2.3.4	Capitalize "Services" in the last sentence of paragraph 2 on page 37.	Betsy Metcalf	EPA, OECA, OC
49	2.3.5	Change "CDX Client" to "CDX Node" because irregardless of whether the submitter uses a state node or a web form the submission is made to CDX's node on the Exchange Network. Change "Click on the hyperlink to the CDX Node (listed under Available Account Profiles)" to "Click on the hyperlink for the AFS data flow"	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
50	2.3.5	Change all occurrences of "user" to "submitting party" CDX does not send user notification of status nor can the user view them online. Submitting party requests the status from CDX and downloads the results from CDX either through their node or using a web form.	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
51	2.3.7	Section 2.3.7: There's that reference to Full Batch again. What is this? Please explain somewhere in this document what type of batch files there are.	Betsy Metcalf	EPA, OECA, OC
52	2.3.8	Change "ICIS will also return three separate Batch Response Files in XML format and a File Level Error Report in both XML and PDF (if a file level error exists) to the users" to "ICIS will also return three separate Batch Response Files in XML format, or a File Level Error Report (if a file level error exists) in both the XML and the PDF to the submitting party"	Alison Kittle	EPA/OECA/OC/ETDD/DSIMB
53	3.0 Functional, Data, and Business Requirements	EPA is under the mistaken notion that states and locals do not have their own native systems and will be using ICIS-AFS for all their in house data tracking and reporting. This is clearly not going to be the case. There are many, many 'system required' and 'program required' requirements that are not currently MDRs. If they are not currently MDRs then they should not be included in 'required' categories. If the fields with these conditions are mandatory, then this will be a significant increase in local burden to not only enter the data but more importantly collect and verify the data.	Ken Mangelsdorf	South Coast AQMD
54	3.1 Facility Overview	Need to track both active and inactive subparts of air programs.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
55	3.1 Facility Overview	Screens seem to be overly complicated and lengthy. Type still appears to be VERY small, and the screens are VERY inefficient in the use of space. Way too much white space. We have no idea about the tab order of the data entry fields which can have a significant effect on speed of data entry. There are lots of data entry fields that are required, MDRs, that could easily create many data entry errors if tab order included non-required fields. Discussion has only been about the look, with no mention of the feel of the system. Feel is critical for quick, accurate data entry.	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
56	3.1.1 Facility	5.6.1 - Our system does not contain the following information on portable source indicator, portable source site name, portable source start date, and portable source end date. Maintaining this type of data would be a data burden for us.	Carol J. Boney	South Carolina
57	3.1.1 Facility	1. Pg 53, Sec 3.1.1.1 - Owner history: Owner information was discussed during Tier 3. There was no place for this information in ICIS-AFS. Legacy AFS and ICIS-AFS focus on the facility location which can be different than the owner/corporate location. AFS has fields for the company information on the mailing label. Pg 62, Sec 3.1.1.3 42. This item shows that the Secondary NAICS is System required. We discussed in Tier 3 and the secondary NAICS is not system required. This should be corrected. Pg 63, Sec 3.1.1.3 43. and 44. This item shows Primary and Secondary SIC is System required. We discussed this in Tier 3 and the secondary SIC is not system required. This should be corrected. Pg 63, Sec 3.1.1.3 52. Attainment/Nonattainment Status is marked as System and Program required. This field will be system populated from another EPA system. Pg. 64, Sec 3.1.1.3 67. Government Ownership is marked as System and Program required. Is this correct? Pg 66, Sec 3.1.1.3 77. Pollutant Code is marked as System and Program required. If you have the pollutant, that info should be able to populate the chemical abstract code. 78. Chemical Abstract seems to be system generated from the pollutant info. Is that correct? Pg 71, Sec 3.1.1.5 - Notional Screen shows County as a required field. Is this correct? Pg 75, Sec 3.1.1.5 - Notional Screen shows County and Primary SIC as required fields. Is this correct?	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
8	3.1.1 Facility	Page 54 1. The method for roll up of pollutant classification continues to ignore the fact that it is possible for a facility to be major for a pollutant under PSD or NSR, but not be major for TItle V. In Alabama, and many other states, sources are mistakenly categorized as major for purposes of CMS because AFS (and now ICIS-AFS) assumes any pollutant classified as major means the facility is major for Title V for this pollutant. Since the pollutants are now at the facility level, it should be made clear in the business rules that only the pollutant's status under Title V should be reported. 2. The documentation and ICIS-AFS screens should indicate that the facility level pollutant clasiification is actually reflecting a source's status under the Title V program. No MDR's or other EPA initiatives reference any classification other than under Title V. Table 3.1-5 Item 12. The valid values for Facility Type should be Title V Major, Title V Synthetic Minor 80%, Title V Syntheric Minor, Title V Minor, and Part 61 NESHAP Minor. Since is EPA is not interested in tracking PSD status in this system, clarifying which classifications are Title V is very important. Items 41-42. Only the Primary NAICS code is an MDR, the secondary NAICS code should not be system required. Items 43-44. Primary and Secondary SIC codes are <u>not</u> MDR, they should not be system required. Items 71, 74-75. Air Program Shutdown date, Air Program Subpart Start date, and Air Program Subpart Shutdown date are not an MDR, but they are listed as Program Required. Item 72. All Applicable Air Program Subparts are listed System Required and Program Required; however, they are not MDR for minor sources. The MDR document specifically lists them as optional for minor sources. Items 79-80. Again, it should be indicated that the emissions levels for Major, Synthetic Minor, and Minor are in reference to Title V major source emission thresholds.	Christy Monk	Alabama DEM
59	3.1.1 Facility	Table 3.1-3, second row, third colmn should be 'SM' not 'Minor'. Table 3.1-5, row 42, third column should be 'N' not 'Y' since secondary NAICS are not required. Rows 45-48 column 4 should be Yes. Portable source data is programmatically required, so those are conditionally Yes's. Generally, are you identifying such situations or do you feel that it is not necessary. Please explain. Page 66, first two rows: they are either one or the other. Please indicate in the table somehow.	David Meredith	EPA/OECA/OC/E TDD/DSIMB

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
60	3.1.1 Facility	ID 1. FRS Identifier might not want to be System required – there may not be an FRS ID if the user is entering a new facility; in addition, FRS IDs may change. ID 4. How is government ownership / federal facility defined? We have a codeset - appropriate to suggest to AFS, or if not, can we map between them? ID 10. Facility Name (says 0 to many) this field will just have one value, correct?	David Smith	EPA/OEI/OIC/IESD/ISSB
61	3.1.1 Facility	Air Program Operating status (Start/shutdown dates): for batch users, will this date be populated as the date the batch is uploaded, or will it have to be included. in the record? Table 3.1-4 SIC Codes: since this is no longer MDR, all facilities may not have a SIC code listed, which would render inaccurate results when used as search field. Table 3.1-5 - Item 16 - Local Control Agency is a SR, not all states will have a LC agency. Item 42 Secondary NAICS is listed as SR. Only primary NAICS is a MDR. Item 43-44 lists primary and secondary SIC as system requirements. Since SIC is no longer a MDR, it should not be a SR element. Item 70 & 71- Air program Start/shutdown Date- not current MDRs. Item 74 & 75 Subpart start/end date not a current MDR. In MS, portable sources are permitted as stationary sources, If a facility relocates, a new permit # is assigned based on its new location. Our internal database does not differentiate between a portable source as defined by EPA and a stationary source since they are both permitted in the same manner.	Kayra Johnson	MS DEQ
62	3.1.1 Facility	Entry and edit screens have way too many 'sections' and the emphasis of design seems to be that the system should provide summaries of everything possible on screen. This only clutters up the screen but makes navigation to the pertinent data much more problematic. The summary data is available on the OTIS/ECHO sites if we want to get it.	Ken Mangelsdorf	South Coast AQMD
63	3.1.1 Facility	Deletion of facility - is that to be limited or can any user delete a facility? If that is the case I suggest that deletion of facility be limited to EPA personnel after the initial migration and data clean up is completed).	Nattinee Nipataruedi	Alaska
64	3.1.1 Facility	Section 3.1.1: Individual Air Programs will have the ability to have subparts that are ACTIVE or INACTIVE.	Betsy Metcalf	EPA, OECA, OC
65	3.1.1 Facility	Section 3.1.1.1 Owner History: Legacy AFS never had the ability to track Owner information. You indicate that owner history will be tracked as a repeating attribute of the Facility. Owner information is not a separate field on the Facility screen, and from what I can tell is part of the Contact table. Please expand on how Owner History will be tracked.	Betsy Metcalf	EPA, OECA, OC
66	3.1.1 Facility	Table 3.1-4, ID 8: Federal Facility ID appears to be duplicated. Please describe Tribal Land as Tribal ID number and Description.	Betsy Metcalf	EPA, OECA, OC
67	3.1.1 Facility	Table 3.1-4, ID 36: We need more description on how Owner information will be tracked.	Betsy Metcalf	EPA, OECA, OC
68	3.1.1 Facility	Table 3.1-5: Reader should not have to go to page 66 to see the key for this multipage table. Please put it up front for easier reading.	Betsy Metcalf	EPA, OECA, OC
69	3.1.1 Facility	Table 3.1-5, ID 4: Please include County Name with the FIPS code.	Betsy Metcalf	EPA, OECA, OC
70	3.1.1 Facility	Table 3.1-5, ID 42: Secondary NAICS is NOT System Required. Please change to N.	Betsy Metcalf	EPA, OECA, OC
71	3.1.1 Facility	Table 3.1-5, ID 74: This should indicate that the date is system generated for web users.	Betsy Metcalf	EPA, OECA, OC
72	3.1.1 Facility	Table 3.1-5, IDs 77 & 78: Please indicate that the user can enter a Pollutant Code OR a Pollutant Name OR a Chemical Abstract Service Number (CASN).	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
73	3.1.1 Facility	Table 3.1-6, ID 25: This requirement references ownership, it is unclear where ownership will reside-within the contacts table or in new fields?	Betsy Metcalf	EPA, OECA, OC
74	3.1.1 Facility	Figure 3.1-4: Please remove Operating Status values of ACTIVE or INACTIVE for Air Program Operating Statuses, as the valid values are operating, permanently closed, temporarily shut down, etc.. ACTIVE or INACTIVE would be logical for Air Program Subparts. As an alternative, please use one status table for both Air Programs and Air Program Subparts.	Betsy Metcalf	EPA, OECA, OC
75	3.1.1 Facility	Figure 3.1-8: Please include County NAME next to the FIP Code. Is there a Portable Source History table?	Betsy Metcalf	EPA, OECA, OC
76	3.1.2 CMS	Pg 89, Sec 3.1.2.3 - 9. Planned Evaluation Fiscal Year is shown as requried. We discussed this in Tier 3 and this should be changed to optional.

10. Planned Evaluation On or Off Site Visit. We discussed this in Tier 3 and this should be changed to optional.

Pg 102, Figure Sec 3.1.26 - Notional Screen shows Fiscal Year and On or Off-site visit as MDR. This should be changed to optional. | Chris Cote | Ventura County APCD |
| 77 | 3.1.2 CMS | Table 3.1-9 Items 9-10. Planned Evaluation Fiscal Year and Planned Evaluation On or Off Site Visit are indicated to be system required, but they are not current MDR.

Table 3.1.10 Items 35-36. This contradicts what was agreed to in one of the webinars. I had made the comment that October 1 was too early to permanently capture the CMS category, and I believe it was Jason Swift agreed that it made sense to also update that field on Day X to allow agencies time to ensure their CMS universe is correctly reflected along with the FCE's that were done. | Christy Monk | Alabama DEM |
| 78 | 3.1.2 CMS | Page 82, second full paragraph: Strike 'updated to be more'   Page 87, row 12: comment / free text field or tbd for design?   On page 89 rows 9 and 10: I believe that there should be N's in the SR column and Y's in the PR column.   I'll defer to Rob L. on that.   On page 97 CMS category bullet: What if the frequency was manually set? Do we always want to update? If so, there should be an informational message saying that the CMS frequency was updated to x (whatever number). Clean up/clarify language on page 113, first sentence. | David Meredith | EPA/OECA/OC/E TDD/DSIMB |
| 79 | 3.1.2 CMS | Region 9 handles our CMS data entry per the CMS agreement. | Ken Mangelsdorf | South Coast AQMD |

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
80	3.1.2 CMS	Introduction: Change section header to read "The CAA Stationary Source Compliance Monitoring Strategy" Change 'A Compliance Monitoring Strategy' to 'THE Compliance Montioring Strategy' Second Paragraph first sentence should read, "The CMS Outlines core compliance monitoring activities and focuses on federal enforceable requirements for Title V major sources and SM-80 sources. The CMS provides recommended minumum evaluation frequencies." Change Regulated Agency to Delegated Agency Where is the definition of 'SM-80s"? Last Paragraph of introduction change "that support the processing of" to "that support he oversight/implementation of the"	Rob Lischinsky	EPA HQ
81	3.1.2 CMS	Figure 3.1-17, First bullet: provide explanation on why December 1st date is used.	Rob Lischinsky	EPA HQ
82	3.1.2 CMS	Footnote 4: Explanation should first be provided when mentioning Dec. 1 date. Also, expand explanation to refer to 60 day timeliness standard	Rob Lischinsky	EPA HQ
83	3.1.2 CMS	Table 3.1-8, ID 4 should be consisted with wording in bullet above "There will be a Delete option only for system administrators to permanently remove a CMS record if they were erroneously added to the system."	Rob Lischinsky	EPA HQ
84	3.1.2 CMS	Table 3.1-8, ID 5 & ID 9: How can you have an "offsite" visit? Do you mean Off-site evaluation?	Rob Lischinsky	EPA HQ
85	3.1.2 CMS	Table 3.1-10, ID 2: Change '# Years' to '# Federal Fiscal Years'	Rob Lischinsky	EPA HQ
86	3.1.2 CMS	Compliance Monitoring Strategy (CMS): Just reread these sections twice to understand what they are saying. Please rework the description of the CMS Status. It is too confusing as presented: There needs to be a HISTORIC CMS Status that captures values from previous fiscal years and there needs to be a CURRENT CMS Status that is generated from current (live) data. The descriptions for the CMS status are not clear on this. Additionally, it should be very clear that the CMS Status is generated from existing data (that are current MDRs) and the user does not have to enter any additional data to generate the status.	Betsy Metcalf	EPA, OECA, OC
87	3.1.2 CMS	Section 3.1.2.1, Generation of Two CMS Statuses: this section indicates that ICIS-AFS will track two CMS Statuses, but only defines one. Please expand to include the Current CMS Status and the HISTORIC CMS Status.	Betsy Metcalf	EPA, OECA, OC
88	3.1.2 CMS	NOTE: I personally prefer "WITHIN FREQUENCY" or "NOT WITHIN FREQUENCY" over "OVERDUE" or "NOT OVERDUE".	Betsy Metcalf	EPA, OECA, OC
89	3.1.2 CMS	NOTE: Users will be confused with the CMS Origination Date, CMS Start Date and CMS Effective Date. Expect confusion.	Betsy Metcalf	EPA, OECA, OC
90	3.1.2 CMS	Table 3.1-8, ID 7: The system should not default a CMS Frequency, this must be user provided.	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
91	3.1.2 CMS	Table 3.1-8, ID 10: I believe that the data element name(S) listed here are incorrect. Users without Enforcement Sensitive Access should NOT see the CMS Frequency, CMS Effective Frequency, Next FCE Due Date, Current CMS Status and any Planned Evaluation information.	Betsy Metcalf	EPA, OECA, OC
92	3.1.2 CMS	Table 3.1-8, ID 11: Please add CMS Historical Status	Betsy Metcalf	EPA, OECA, OC
93	3.1.2 CMS	Table 3.1-8, ID 25: This message is unclear—what is the message supposed to convey? It should ask the user "Are you sure you want to delete this facility from the Current CMS Plan?"	Betsy Metcalf	EPA, OECA, OC
94	3.1.2 CMS	Section 3.1.2.5: THE Compliance Monitoring Strategy is a policy outlining …..	Betsy Metcalf	EPA, OECA, OC
95	3.1.2 CMS	Section 3.1.2.5, CMS Frequency: I do not recommend that we use a defaulted Frequency value.	Betsy Metcalf	EPA, OECA, OC
96	3.1.2 CMS	Section 3.1.3: This introduction needs to be re-written. In the air program, there are multiple types of permits but tracking of Title V permits was established during the 90s and AFS was updated to track these permits. The mandatory tracking of Title V permits was part of AFS and introduced to the system in 1995. Subsequently, tracking of Title V permits has been dropped as minimum data requirements (MDRs) for AFS reporting. Reporters have the option of reporting Title V (a permit designed to encompass all permits and programs at a facility) or non-Title V facilities. Please update this introduction.	Betsy Metcalf	EPA, OECA, OC
97	3.1.2 CMS	NOTE: If funding for design is severely limited, it is recommended that the permit module of ICIS-AFS be dropped.	Betsy Metcalf	EPA, OECA, OC
98	3.1.2 CMS	Figure 3.1-37: Permit Tracking Events- Major Modification Issued: There can be multiple modifications posted per permit.	Betsy Metcalf	EPA, OECA, OC
99	3.1.2.5 Add Compliance Monitoring Strategy	Change first sentence in the first paragraph to read as follows: "Pursuanct to the Compliance Monitoring Strategy, a CMS Plan provides a lsit of Facilitities to be evaluted along with the neogtiated evaluation frequency."	Rob Lischinsky	EPA HQ
100	3.1.2.6 Edit Compliance Monitoring Strategy	Change Header and First sentence in paragraph from "Compliance Monitoring Strategy" to "Compliance Monitoring Plan"	Rob Lischinsky	EPA HQ
101	3.1.2.6 Edit Compliance Monitoring Strategy	Figure 3.1-25, How do we know if FCE or PCE? Change Example comments	Rob Lischinsky	EPA HQ
102	3.1.2.7 Delete Compliance Monitoring Strategy	Change Section header to read "Delete Compliance Monitoring Record"	Rob Lischinsky	EPA HQ

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
103	3.1.2.9.1 Generate CMS Status on Current CMS Data	Example 1: Change "CMS Frequecy: 2" to "CMS Frequency: 2 Fiscal Years" Example 3: Inccorect, have until 12/1/004 to Report the FCE Example 5: When was the Facility Evaluated? Has it yet to be evaluated since it came into frequency on 2/1/02 ? What prompted it to be become an A? Want other example of an alternative plan, NOT change Category but change the FREQUENCY.	Rob Lischinsky	EPA HQ
104	3.1.2.10 Generate CMS Status on Historical CMS Data	Example 5: basically same exampole as Example 5 on pg 99. Was this facility evaluated on 12/1/08 and that prompted the change from S to A?	Rob Lischinsky	EPA HQ
105	3.1.3 Permit	Pg 121, Sec 3.1.3.4 - 1. says: When a Permit is added, the user must enter the Permit Type, Facility iD, Permit Identifier, Permit Issue Date or the transaction will be rejected. Most actions are added to the Facility rather than the permit. So, it seems the permit information would be optional.	Chris Cote	Ventura County APCD
106	3.1.3 Permit	First paragraph on Pg 116, last sentence, "While a Permit is required for a source to begin operation…" That is not correct if the "Permit" is a Title V permit. Sources are not even required to apply for a Title V MSOP until 12 months after they start operation as a major source. Air sources acquire construction permits to authorize construction followed by another authorization/permit to authorize operation. The Title V permit is not part of that process.	Christy Monk	Alabama DEM
107	3.1.3 Permit	Page 117, first full paragraph, last line: How many is a 'handful'? Be specific. Section 3.1.3.1 permit tracking events: replace 'other' with 'additional' Same section: do we need 2 dates to define the 45-day review period?	David Meredith	EPA/OECA/OC/ETDD/DSIMB
108	3.1.3 Permit	The region enters permit data. SCAQMD does not issue TV permits with a 'permit number' to identify it.	Ken Mangelsdorf	South Coast AQMD
109	3.1.3 Permit	Table 3.1-12, ID 10: Change "Draft Permit Rec'd by EPA" to "Draft Permit Received by EPA"	Rob Lischinsky	EPA HQ
110	3.1.3 Permit	Table 3.1-13, ID 4: Change "Public Petitions EPA - Mod" to "Public Petitions EPA - Modification"	Rob Lischinsky	EPA HQ
111	3.1.3 Permit	Table 3.1-14, ID 1, Business Requirement is not consisted with Table 3.1-12 ID 8.	Rob Lischinsky	EPA HQ
112	3.1.3 Permit	Table 3.1-12, ID 8: Users should be able to enter permit information before the permit is issued. This ID indicates that the date a permit is issued is mandatory for permit information. Please allow users to add permit information even if the permit is still draft.	Betsy Metcalf	EPA, OECA, OC
113	3.1.4 Wood Stoves Reports	Have no idea what this is about!	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
114	3.2 Compliance Monitoring Overview	Region 9 handles our CMS data entry for the CMS agreement basic data entry.	Ken Mangelsdorf	South Coast AQMD
115	3.2 Compliance Monitoring Overview	For this module the MDRs indicate the input of federal statutes, and subparts, and air programs for each compliance and monitoring elements. Alaska does not record that information in their database therefore it would be a burden on the state to submit that data.	Nattinee Nipataruedi	Alaska
116	3.2.1 General Compliance Monitoring	For programming and status purposes, the normal frequency for a major source is 2 years from the last inspection date plus the time to the end of that FFY. We feel that the CMS status should be calculated using the same logic as Legacy AFS. We just want to make certain we will have until Dec 1st to have all data entered.	Carol J. Boney	South Carolina
117	3.2.1 General Compliance Monitoring	There is a lot of data on the screens that are system required fields but are not now MDRs.	Ken Mangelsdorf	South Coast AQMD
118	3.2.1 General Compliance Monitoring	Section 3.2.1.1, Different Screens and XML Schemas….Please delete the work "Plan" from the first sentence.	Betsy Metcalf	EPA, OECA, OC
119	3.2.1 General Compliance Monitoring	Table 3.2-1, IDs 2 & 3: We may want to consider having the Search Function work the same way for Investigations and TV ACCs. TV ACCs cover a review period, using the Start Date and End Date on the Search screen. Investigations will have a start and end date, as they typically cover extended periods of time. Other Compliance Monitoring activities (FCE, PCE, Stack Tests, Information Requests) will have one date of importance: The date the activity was conducted. Reporting the Scheduled Date of these Compliance Monitoring Activities should not be important—they are not used in national reports and not used for analysis.	Betsy Metcalf	EPA, OECA, OC
120	3.2.1 General Compliance Monitoring	Figure 3.2-1: The search by LCON should incorporate the LCON Code in the list of valid values.	Betsy Metcalf	EPA, OECA, OC
121	3.2.1 General Compliance Monitoring	Figure 3.2-1: After ST is selected, a list of valid Counties should be presented to facilitate county and multiple county searches.	Betsy Metcalf	EPA, OECA, OC
122	3.2.1 General Compliance Monitoring	Figure 3.2-3 and -4: Here's that enforcement-sensitive HPV case again in the list of Linked Alleged Violation Files. This is an illogical example, please remove the "Yes".	Betsy Metcalf	EPA, OECA, OC
123	3.2.2 FCE, PCE, Investigations & Info. Requests	We have concerns that some of the data elements that are currently not MDRs will become required fields for the States in the future. For batch users reprogramming could be a data burden and costly to the states. We know that you say only * items are required but we want to voice our concern again of any new additional MDRs.	Carol J. Boney	South Carolina
124	3.2.2 FCE, PCE, Investigations & Info.	Pg 149, Information requests. This section refers to Section 114 letters that EPA serves. Pg 150, Also mentions information requests for delegated agencies. This is a new reporting category and not an MDR. This category would be a problem for states/locals. What types of information requests are proposed to be reported? During a Tier 3 call we asked whether a request for an MSDS from a body shop	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
	Requests	would have to be reported. The answer was "No". If the only requirement is to report Section 114 letters, that would be acceptable because many states/locals don't send Section 114 letters. Otherwise the category of information requests will have to be discussed further. Pg 150, Lead Agency - this section has Local Government and EPA Grantee (not State). Ventura County APCD is both. In this context is the local government category referring to non-Grantee local districts? Pg 151 New data elements - Part of National Initiative, State Priority, and Link to Report are all new data elements. These should be optional for states/locals/tribes. Pg 153, 14. This section lists the data elements for Delegated Agency users but doesn't show which are MDR's. Pg 155, 3. Compliance Monitoring Activity Name. This is shown as System Required by both types of agencies in the Federal or Delegated Agency column but the Requirement section says it is Federal only. The Fed or DA column should be changed to Federal only. Pg 156, 11. Federal Statutes - a default to the CAA will work. 12. Law Sections - this is okay if it is only required for federal users. But it would be a problem for states/locals/tribes that don't directly enforce the Clean Air Act. We will need a generic code that we can use. 13. Air Programs - Title V, SIP, and FESOP are manageable. Other programs can be a problem for states/locals/tribes that don't directly enforce the Clean Air Act.		
125	3.2.2 FCE, PCE, Investigations & Info. Requests	The table in Section 3.2.2.1 doesn't specify the meaning of the asterisk for some entries in the table.	Christy Monk	Alabama DEM
126	3.2.2 FCE, PCE, Investigations & Info. Requests	PCE data is not currently a MDR. Regarding FCE, will both start and end date be required data?	Kayra Johnson	MS DEQ
127	3.2.2 FCE, PCE, Investigations & Info. Requests	The text on page 49 defines an investigation and says that an investigation can be at one or more facilities. Need explanation how that works.	Ken Mangelsdorf	South Coast AQMD
128	3.2.2 FCE, PCE, Investigations & Info. Requests	Section 3.2.2, 5th paragraph: Section 114 letters, or Information Requests, …	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
129	3.2.2 FCE, PCE, Investigations & Info. Requests	Page 150, Unmarked Table: You should mark this table as all others are marked and listed in the Table of Contents. PCE reporting is mischaracterized for AFS: PCE actions include the PCE Type and should be included in the block with PCE Action Descriptions.	Betsy Metcalf	EPA, OECA, OC
130	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-3: The table values should be defined with the table title, not on page 164.	Betsy Metcalf	EPA, OECA, OC
131	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-3, ID 2: The Compliance Activity Type is not System Generated.	Betsy Metcalf	EPA, OECA, OC
132	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-3, ID 11: Federal Statutes should be required by Federal users only, Delegated Agency users are required to report the appropriate Air Programs (ID 13).	Betsy Metcalf	EPA, OECA, OC
133	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-3, ID 17: Pretty sure there is no need for this for Federal CAA users.	Betsy Metcalf	EPA, OECA, OC
134	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-3, ID 35: We should know that a compliance monitoring activity was completed by the state or local agency, this requirement is not identified as required. It should be system and program required information.	Betsy Metcalf	EPA, OECA, OC
135	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-3, ID 41: Why do we need this? If a facility is part of a National Initiative, it will be identified in ID 42. Recommend deleting this question.	Betsy Metcalf	EPA, OECA, OC
136	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-4, ID 5: This ability to add pollutants not listed on the Facility level will need to be retrievable.	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
137	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-4, IDs 9-11: What is a BGP? Please spell out.	Betsy Metcalf	EPA, OECA, OC
138	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-4, ID 27: Recommend removing this question.	Betsy Metcalf	EPA, OECA, OC
139	3.2.2 FCE, PCE, Investigations & Info. Requests	Table 3.2-4, ID 28: It was my assumption that the PCE Type is optional, as Table 3.2-3, ID 15 does not require it. Please delete ID 28.	Betsy Metcalf	EPA, OECA, OC
140	3.2.2 FCE, PCE, Investigations & Info. Requests	Figure 3.2-5 and -6: What is BGP?	Betsy Metcalf	EPA, OECA, OC
141	3.2.2 FCE, PCE, Investigations & Info. Requests	Figure 3.2-8: Please make the Air Programs and Pollutants available via a drop-down list. These should be taken from values already existing on the facilitiy.	Betsy Metcalf	EPA, OECA, OC
142	3.2.3 Stack Tests	This is going to be a challenge for all to manage in ICIS-AFS initially. NC will continue to review paper stack tests reports until NC become more familiar with the ERT data review process. NOTE: Legacy AFS did not require users to provide Pass, Fail or Pending test results for each pollutant. Only the test results for the entire source test was required.	Bernard McKee	NC DENR
143	3.2.3 Stack Tests	3.2.3.3- We currently enter date of stack test, pass/fail/pending, pollutant, air program, but we do not enter purpose of Stack Test and all other related information in 5 - 5.9.7. This could be part of information that will be a part of the electronic reporting. If these elements are not considered part of the electronic reporting this will be a huge data burden. As mentioned in modernization calls it will be very important that the drop down function for pollutants be user friendly.	Carol J. Boney	South Carolina

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
144	3.2.3 Stack Tests	We have concerns about electronic data – 1. source tests and excess emission reports may be posted to the public website before they have been reviewed. 2. who will submit the data to EPA – regulated facilities? test companies? States/locals? 3. who has the authority to require private test companies to submit data to EPA in a standard format? 3. who will train the test companies, etc. who will submit the electronic data? 4. will states/locals be expected to review test data that contains different data points than they require? 5. Electronic reporting and/or reviewing electronic documents is not a current MDR. If this work becomes required, it appears to be an increase in burden. Pg 191 - 8. Test conducted by - in most CA districts, source tests are performed by private test companies. This option needs to be added to the list of valid values. Pg 192 - 19. Pollutant tested. This was discussed during Tier 3 and there was uncertainty about what pollutants would be reported. It might be only the failed pollutants, or it might be all pollutants that would be reported. It sounded like EPA was going to have more internal discussions on this point. Pg 198 - Notional screen - Conducted by. The pick list for this field will have to include an option for a private test company. Pg 204 - Notional screen - Method Codes. This field is not an MDR and is not marked as an MDR. Entering this data could be a problem for states/locals so it should remain optional.	Chris Cote	Ventura County APCD
145	3.2.3 Stack Tests	Table 3.2-7 Item 8. "Conducted by" is very vague as to what it is referring...stack test or stack test report review. The name of this field should be more specific. Item 15. Purpose of stack test is identified as system required and program required. If it is an imported field, it is fine. However, if it must be entered in ICIS-AFS, this data is not currently an MDR, and definitley goes beyond the scope of reported for which air program the test was conducted. Item 19. Pollutant tested is identified as system required and program required. If it is an imported field, it is fine. However, if it must be entered in ICIS-AFS, this data is not currently an MDR.	Christy Monk	Alabama DEM
146	3.2.3 Stack Tests	Page 191 row 8: add owner/operator.	David Meredith	EPA/OECA/OC/ETDD/DSIMB

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
147	3.2.3 Stack Tests	Table 3.2-7 Item 5- Purpose of stack test is not a current MDR. Table 3.2-7 Item 8 Conducted by : not a current MDR. Agencies don't usually conduct the test, they only review reports received from the facility and conducted by third parties. It is not a current MDR. Item 14 is a new MDR not currently reported by states. General comments: it appears for batch states, reviewing stack tests imported from ERT will be a challenge and duplicate records will be created since the system will not know how to link the reviews to the data imported from the ERT. This will present an issue specially during data verification for SRF purposes. also, it appears the system will update the records with the name of the person who creates it as the one who is conducting the review. that would be innacurate for states that do not use the federal system to run their programs.	Kayra Johnson	MS DEQ
148	3.2.3 Stack Tests	I was under the assumption that this was a PCE	Ken Mangelsdorf	South Coast AQMD
149	3.2.3 Stack Tests	Is ICIS-AFS going to download the majority of the stack test data through ERT? Alaska also collects and uploads stack test data. With 2 datasets coming in Alaska is worried about duplicates and the need for more data QA/QC.	Nattinee Nipataruedi	Alaska
150	3.2.4 Title V ACC	3.2.4.2 - Items found under 5.7.2, 5.7.3, 5.9.1, and 5.9.11. There are many data elements included for TVACC entry that we are not currently entering. We enter received date, due date, and date we complete review, results, and if deviations were noted. Entering additional information will be a data burden for us. These items would be an additional data burden: review start period, end period, and all information in the child TV ACC record: received date, reviewed date, did facility identify something wrong, deviations, deviations with excess emissions, review status, review comments,etc.	Carol J. Boney	South Carolina
151	3.2.4 Title V ACC	Pg 215 - Phased approach, 3. At the end of #3 this section includes "link to TV ACC report". Linking to the report is not an MDR. Entering the test reports electronically is not an MDR. If an agency reviews an electronic report and/or the report is available electronically, they could have an option to link to the report. This has to be optional. And the districts should not be required to submit their copy of the TV ACC electronically. Pg 217 - 4. Permit ID. This is a new MDR. In AFS, Actions are linked to a Facility ID, not a Permit ID. We keep the same Facility ID # from year to year, even though the permits are renewed each year. The computer has a tracking number for permits that is a "behind the scenes" type of field. The Permit ID doesn't seem necessary but could be available on an optional basis if someone wanted to use it. But, it shouldn't be an MDR. 5. Due Date is entered by Region 9. Pg 218, 6. Review Period Start Date is shown as system and program required but this is not an MDR. 7. Review Period End Date is shown as system and program required but this is not an MDR. Pg 221, Sec. 3.2.4.5 says users must provide the Permit ID when entering a new TV ACC record. Permit ID is not an MDR. Pg 223, Figure 3.2-28 has a flow chart that selects a Permit ID and then a Facility ID. These should be reversed. A permit is a subset of a facility. The Permit ID should also be optional. Pg 224 - Notional Screen - shows the Permit ID as an MDR, but it isn't an MDR. The Permit ID should be optional.	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
		Pg 229 - Notional Screen - Lead Agency. This field should be filled with a default based on the user's ID.		
152	3.2.4 Title V ACC	Page 215. In the Permit Data section, it states that Permit ID is a MDR in ICIS-AFS. EPA has not received OMB approval for this data; therefore, the system should not be design with it as such. Table 3.2-10, Item 4. Permit ID is listed as system required and program required. It is not an MDR. Item 5. The TVACC due date is only an MDR for EPA unless the states have agreed to enter it. Alabama has not. Item 6-7. Review Period Start and End Dates are listed as SR and PR, but neither is an MDR.	Christy Monk	Alabama DEM
153	3.2.4 Title V ACC	Permit # would be a new MDR. It appears it would create a new Permit record when entered on the ACC screen. Per webinars, it was indicated the MDR for the permit module would not be required when the permit was entered at the ACC level. Table 3-2.10 Item 7&8 should be reporting period start/end date, not review period. item 31- for batch users, the name would have to be part of the record, otherwise all ACC would show as having been reviewed by one person (whoever uploaded the batch).	Kayra Johnson	MS DEQ
154	3.2.4 Title V ACC	This one too!	Ken Mangelsdorf	South Coast AQMD
155	3.2.5 CEM & EER	The CEM and EER reports will be reviewable in ICIS - AFS once the electronic reporting rule is promulgated and is functioning in ICIS-AFS.	Bernard McKee	NC DENR
156	3.2.5 CEM & EER	If Discovery Action for an AVF is a CEM or EER not electronically reported, will the user have to create a record for the CEM/EER??	Kayra Johnson	MS DEQ
157	3.2.5 CEM & EER	Not sure how this will affect us.	Ken Mangelsdorf	South Coast AQMD
158	3.3 Enforcement Actions Overview	Pg 259, Table 3.3-3 3. The SR and PR fields have "F". It seems like these should be a "Y". If not, what does "F" mean? Pg 260, Table 3.3-3 11. The SR and PR fields have "F". It seems like these should be a "Y". If not, what does "F" mean?	Chris Cote	Ventura County APCD
159	3.3 Enforcement Actions Overview	We have asked, for many years, and have yet to receive a definition of or even a discussion of the terms associated with enforcement actions. Our state/local definitions are not the same as EPAs and lead to much confusion. Commonality of terms with different definitions and uses for the same term makes data entry confusing and is conducive to more data entry errors. Further discussion needs to take place.	Ken Mangelsdorf	South Coast AQMD
160	3.3 Enforcement Actions Overview	Enforcement Actions in ICIS AFS an MDR is for federal statutes and regs. Alaska does not have that data instead it refers to state regulations or statues since we are the regulatory agency executing the enforcement action. Can EPA work with the state of Alaska to create a crosswalk from the state regs against the federal regs so correct data will be loaded into ICIS-AFS.	Nattinee Nipataruedi	Alaska
161	3.3 Enforcement Actions Overview			

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
162	3.3 Enforcement Actions Overview	Section 3.3: Steps need to be taken to provide the ability to add subactivities: activity that is non-informal or –formal enforcement actions. There is a need to capture activity that lends more information and explanation on why or how an action was completed such as "Meeting with Facility", "Bankruptcy Filed", "Fire at Facility".	Betsy Metcalf	EPA, OECA, OC
163	3.3.1 General Enforcement Actions			
164	3.3.1 General Enforcement Actions	Figure 3.3-1: LCON Search should use a table that is populated with the LCON codes as well as the description to facilitate use. Is this Search screen going to be used by both FE&C users and CAA Delegated Agencies?	Betsy Metcalf	EPA, OECA, OC
165	3.3.2 Informal Enforcement Actions	3.3.2.2- Item 8. We currently do not enter any citations and this will be a data burden. This also would pertain to information in Table 3.3-3 Informal Enforcement Action Data Requirements items 10, 12, 13, 16, and 17.	Carol J. Boney	South Carolina
166	3.3.2 Informal Enforcement Actions	Table 3.3-3 Item 15. Applicable Air Pollutants is denoted as SR and PR. Currently, violating pollutants for HPV only are MDR. Therefore, it is not appropriate to make the SR/PR for all actions. In addition, it seems redundant to have violating pollutants on both the Enforcement Action record and the Alleged Violation FIle Record.	Christy Monk	Alabama DEM
167	3.3.2 Informal Enforcement Actions	Section 3.3.2: This description of informal enforcement actions is correct, but we will need to ensure that official policy is released to support this change of Notice of Violation definition.	Betsy Metcalf	EPA, OECA, OC
168	3.3.2 Informal Enforcement Actions	Table 3.3-3: Once again, the legend for the table values should appear at the top of the table so the user doesn't have to page through the document to find the end of the table.	Betsy Metcalf	EPA, OECA, OC
169	3.3.2 Informal Enforcement Actions	Table 3.3-3, ID 10: Federal Statutes should not be required for Delegated Agencies. The Air Programs should be required with Federal Statues provided as optional data fields.	Betsy Metcalf	EPA, OECA, OC
170	3.3.2 Informal Enforcement Actions	Table 3.3-3, ID 12, 13 & 15: These values should be on record with the Facility information, however, additional air programs, subparts or pollutants should be acceptable, with the ability to retrieve ONLY those additional records.	Betsy Metcalf	EPA, OECA, OC
171	3.3.2 Informal Enforcement Actions	Section 3.3.2.5: Federal Statues Violation should not be required. These can be extrapolated from the CAA Air Programs.	Betsy Metcalf	EPA, OECA, OC
172	3.3.2 Informal Enforcement Actions	Figure 3.3-7 & -8: Where is the Violating Pollutants field?	Betsy Metcalf	EPA, OECA, OC
173	3.3.2 Informal Enforcement Actions	Figure 3.3-11 & 12: Where is the Violating Pollutants field?	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
174	3.3.3 Formal Enforcement Actions (DA)	Pg 292 - Notional Screen - Enforcement Action Type The system needs to offer Delegated Agencies Enforcement Action Types that are functionally equivalent to their enforcement actions. At this point states/locals have to choose actions that are not equivalent. One option to solve this would be to provide functional definitions so its easier for state/locals to choose accurate action types.	Chris Cote	Ventura County APCD
175	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-6 Item 18. Applicable Air Pollutants is denoted as SR and PR. Currently, violating pollutants for HPV only are MDR. Therefore, it is not appropriate to make the SR/PR for all actions. In addition, it seems redundant to have violating pollutants on both the Enforcement Action record and the Alleged Violation FIle Record.	Christy Monk	Alabama DEM
176	3.3.3 Formal Enforcement Actions (DA)	Page 259, table 3.3-3: What do the 'F's' mean in the table? Also…on row 7, I don't think that contractors and grantees are valid agency leads!	David Meredith	EPA/OECA/OC/ETDD/DSIMB
177	3.3.3 Formal Enforcement Actions (DA)	How is a Final Order different from an Administrative Order?	Kayra Johnson	MS DEQ
178	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-6, ID 9 & 10: Do not understand why these fields are grey—how is the status and date system generated? There must be consistency with the Air Program and the formal actions used.	Betsy Metcalf	EPA, OECA, OC
179	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-6, ID 14: Federal Statute should be defaulted for Delegated Agencies using these screens to negate required data entry. It is generated here, but listed as required data entry elsewhere in the document.	Betsy Metcalf	EPA, OECA, OC
180	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-6, IDs 15, 16 & 18: Please do not forget to design a procedure for retrieval of data that is added to the enforcement action that is additional to the fields identified on the Facility level as applicable.	Betsy Metcalf	EPA, OECA, OC
181	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-6, IDs 26 and 27: Some penalty (if assessed) amount should be reportable. We need to ensure that penalties are submitted. Neither of these IDs indicate a requirement to report the penalty.	Betsy Metcalf	EPA, OECA, OC
182	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-7, ID 4: Is there an easy way to allow a user to add a new compliance monitoring activity after they have browsed the eligible activities for linkage? We should make it as simple as possible to add activities. If someone is adding an AVF and is trying to link all appropriate action, they should be able to add and link compliance monitoring activities without leaving all of the enforcement and/or AVF files to do so.	Betsy Metcalf	EPA, OECA, OC
183	3.3.3 Formal Enforcement Actions (DA)	Table 3.3-7, ID 10: I thought we had agreed upon not requiring a two-step process for Formal Enforcement Actions for Delegated Agencies. Delegated Agencies report the FINAL ORDER DATE to us now. This needs to be re-written to allow this practice to continue and not have to establish an Enforcement Action record, then come back later to finalize it.	Betsy Metcalf	EPA, OECA, OC
184	3.3.3 Formal Enforcement Actions (DA)	Section 3.3.3.5: Federal Statute Violated should default to CAA for Delegated Agencies using these screens.	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
185	3.3.3 Formal Enforcement Actions (DA)	Figure 3.3-17: Proposed Penalty should read "Proposed Assessed Penalty" and should be ENFORCEMENT SENSITIVE.	Betsy Metcalf	EPA, OECA, OC
186	3.3.3 Formal Enforcement Actions (DA)	Figure 3-3-17: Final Order Type and Name should be defaulted to the Enforcement Action Name and Enforcement Action Type for Delegated Agencies with editing allowed as desired. Delegated Agencies would apply their FINAL ORDER information.	Betsy Metcalf	EPA, OECA, OC
187	3.3.4 Formal Enforcement Actions (EPA)			
188	3.4 Alleged Violation Files	This is an entirely new section with all new MDRs. I do not have a good working knowledge of the Violation process once they are passed on to our legal department. Have no idea how this will work for them. This section requires an incredible amount of additional work to retrieve, review, and enter data that is not required now. It really appears to serve on useful function except to require more data entry of requirements that are NOT MDRs.	Ken Mangelsdorf	South Coast AQMD
189	3.4 Alleged Violation Files	Figure 3.4-4: Allow the ability to add subactivities to the AVF.	Betsy Metcalf	EPA, OECA, OC
190	3.4.1 Summary of AVF	I believe the whole concept of the Alleged Violation File is a data requirement beyond the scope of the MDR for FRV. Formally, S/L could report FRV by changing the compliance status, now EPA is changing to the same level of tracking as for an HPV. Therefore, the requirement to create an Alleged Violation File for FRV does require OMB approval to become an MDR.	Christy Monk	Alabama DEM
191	3.4.1 Summary of AVF	Page 302, top bullet. What is 'noticed'? Same as (aka) informally addressed?	David Meredith	EPA/OECA/OC/ETDD/DSIMB
192	3.4.1 Summary of AVF	The severity of the violations will be system-generated. Will delegated agencies have the ability to change from HPV to non HPV? Also a number of actions are now atributes of the AVF and could have significant database and business process implications, particularly for batch uploaders. Will the timelines to resolve HPVs be changed? Since there is no day zero anymore, how will timeliness be measured?	Kayra Johnson	MS DEQ
193	3.4.2 AVF Functional Requirements			
194	3.4.3 AVF Data Requirements	See Comments under 3.3.2 for Table 3.4-2: Items 4 and 6. We do not currently enter citations and law sections violated.	Carol J. Boney	South Carolina
195	3.4.4 AVF Business Rule Requirements	Page 310, row 11. I believe that comments must remain ES (if they are so designated) after the AVF is no longer ES.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
196	3.4.5 Add AVF			
197	3.4.6 Edit AVF	Page 318: What are status and status date related to? Please clarify / make explicit.	David Meredith	EPA/OECA/OC/ETDD/DSIMB

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
198	3.4.7 Delete AVF			
199	3.4.8 Search AVF			
200	3.5 External Interfacing Systems	Pg 330, This module discusses the sharing of enforcement sensitive data with other EPA data systems. We have concerns about sharing enforcement sensitive data. District counsel has advised us that enforcement data cannot be released to the public until cases are settled. If ECHO plans to make enforcement case data available to the public before settlement, then we can either revisit violaton tracking in ICIS-AFS and/or wait until cases are settled before entering violation data. We also have concerns about how the system will determine which data is correct and which data will be presented to the public. In the reviews we've done of the data in ECHO, the air data is the most current. But, it may not be the primary source of data. The proposal is to have ICIS-AFS exchange data with ECHO, FRS, etc. Which system will have priority?	Chris Cote	Ventura County APCD
201	3.5 External Interfacing Systems	No comments on this section	Ken Mangelsdorf	South Coast AQMD
202	3.5.1 Summary	Pg 330, Sec. 3.5.1 ECHO - This section says ICIS-AFS will update ECHO on a nightly basis. It sounds like Alleged Violation Files with NOV's will be updated nightly because NOV data is not considered Enforcement Sensitive. It also sounds like Addressing actions will also be reported nightly to ECHO. If this is true and we want to keep NOV and addressing info sensitive, then we will have to wait until NOVs are resolved before we can report them to ICIS-AFS. Pg 331, Envirofacts - This section says ICIS-AFS will update Envirofacts on a nightly basis. It sounds like Alleged Violation Files with NOV's and Addressing actions will also be reported nightly to Envirofacts. If this is true and we want to keep NOV and addressing info private, then we will have to wait until NOVs are resolved before we can report them to ICIS-AFS.	Chris Cote	Ventura County APCD
203	3.5.1 Summary	Page 331, Envirofacts bullet, first line/sentence: Add 'from EPA' at end of sentence.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
204	3.5.1 Summary	No comments on this section	Ken Mangelsdorf	South Coast AQMD
205	3.5.2 ECHO	Looks fine.	John Veresh	EPA/OECA/OC/ETDD/ITAB
206	3.5.2 ECHO	No comments on this section	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
207	3.5.3 FRS	Pg 333, 3.5.3.1 - FRS Process 1. This item says ICIS-AFS will export data to FRS. Some of the fields are unfamiliar and haven't been mentioned as fields in ICIS-AFS such as: Facility Affiliation, Organization, Interest, Supplemental Interest 6. This item says ICIS-AFS will import data from FRS. Some of the fields are unfamiliar and haven't been mentioned as fields in ICIS-AFS such as: Facility Affiliation, Organization, Interest, Supplemental Interest, System Reference, Agency Reference, Interest Reference, and UTM coordinates. (It's interesting that UTM's are included in this list. Most Tier 3 discussions hve been about lat/long. Some states/locals use UTM's rather than lat/long so having UTM's available will be helpful.) Pg 334, 3.5.3.1 - FRS Process When you view facilities in ECHO, you can see data from the various systems. The air program tends to inspect facilities more frequently than other programs. In addition, name / address changes tend to be reported by the air program before the other programs. Will the air data be maintained in the system or will it be over-written? How will the system determine which data is the most current and/or be presented to the public?	Chris Cote	Ventura County APCD
208	3.5.3 FRS	Page 334: top line/row: Please clarify. Are there additional geographic requirement(s)?	David Meredith	EPA/OECA/OC/ETDD/DSIMB

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization

209	3.5.3 FRS	General Comments:
		
		• We would want to coordinate with Envirofacts, ideally we could pull data from AFS concurrently with Envirofacts in order to keep data synchronous. We also may want to coordinate any current efforts with ICIS NPDES where we are planning to exchange full extracts rather than change files, which we may think have been leading to data gaps.
		• We would like to see the AFS team consider integrating the FRS facility lookup web service into data entry screens - this could allow users to search and retrieve FRS IDs on the fly.
		• We would like to see the AFS team consider integrating the geocoder web service to validate addresses - it could also help to power the GeoPlatform visualization (Page 334)
		• We could help to work with the AFS team on developing robust guidance and best practices for entering facility data - that could be used to populate help screens or other user interface elements.
		• As a function of metadata, it would also be good to provide specific regulatory or statutory references which define legally what is meant by things like "facility" or "affiliation" in the data.
		• Top-Level Statutory / Regulatory References:
		
		    Title V Amendment to CAA
		    40 CFR Part 70, 71
		    Woodstoves 40 CFR Part 60, Subparts AAA, QQQQ, and RRRR
		    Stacktests 40 CFR Part 64
		
		Specific Comments:
		
		• In the ICIS-AFS export to FRS, SIC/NAICS is missing
		• The export of ICIS-AFS data to FRS and Import of FRS data to ICIS-AFS are scheduled to happen on the Last business day of the month. 5 business days gap between the transfers would be good. We can reduce the gap as we automate the process.
		• Timeline for FRS implementing SSO - Anticipated to be 1Q-2Q 2013
		• FRS does not collect the following:
		  Compliance Monitoring Strategy (CMS)
		  Violation (HPV/FRV)
		  Air Programs
		  Compliance Activity.
			David Smith	EPA/OEI/OIC/IESD/ISSB

210	3.5.3 FRS	No comments on this section	Ken Mangelsdorf	South Coast AQMD
211	3.5.3.1	References to figure and table numbers are incorrect. They need to be fixed.	Michelle Torreano	EPA/OECA/OC/ETDD/DSIMB
212	3.5.4 Envirofacts	No comments on this section	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
213	3.5.5 Electronic Reporting Repository	Pg 337, 3.5.5, Electronic Reporting Repository WebFIRE has emission factor data. (I understand that ERT was designed to collect data to help determine/update emission factors and was not designed to be used by the air program enforcement.) WebFIRE doesn't have a way to search the data by facility or location. Will this search capability be added to WebFIRE? Some states/locals don't have plans to have test companies submit reports electronically. How does EPA intend to inform industry and testing companies of the requirements to submit data via ERT/etc to EPA. Local districts will be unable to provide proper training to industry and test companies to use ERT. Pg 338-343, Table 3.5-4 includes a very long list of test related fields that hopefully are optional or something that industry and test companies are prepared to deal with.	Chris Cote	Ventura County APCD
214	3.5.5 Electronic Reporting Repository	Regarding stack tests, will batch users be able to enter review on those records with imported data, or will a new record be created; leaving the one with imported data without a review date/status?	Kayra Johnson	MS DEQ
215	3.5.5 Electronic Reporting Repository	Page 337 included the following statement: *"ICIS-AFS will not import the physical electronic reports, only the structured metadata around them."* Please see item 8 above with regards to 'metadata.'	Ken Mangelsdorf	South Coast AQMD
216	3.5.6 SRS			
217	3.6 MDRs	NOTE: Any new ICIS-AFS data requirement must go through the ICR process first.	Bernard McKee	NC DENR
218	3.6 MDRs	The reporting requirements need to be as simple and minimal as possible. The California local air districts, and other state/local agencies don't use the data in Legacy AFS and won't use it in ICIS-AFS. The only purpose for reporting is to meet EPA's requirement for oversight. What is the minimum data that EPA needs for oversight? If other states/locals use the data in AFS, then optional fields could be included for them but it's important to keep the mandatory data requirements to a minimum.	Chris Cote	Ventura County APCD
219	3.6 MDRs	The example states that TV ACC Received Date is an MDR. It is not for S/L, only EPA.	Christy Monk	Alabama DEM
220	3.6 MDRs	Since all System required data must also be MDRs, should EPA begin the ICR process before the system is designed with these elements are system required elements?	Kayra Johnson	MS DEQ
221	3.6 MDRs	We have asked for and have yet to receive a listing of proposed or new MDRs for the new system. The current listing of MDRs is rather short, about 40 elements, list. The new system will include many new requirements, whether MDRs or 'system requirements' or programmatic requirements'. If something is required, it is, by definition a requirement!	Ken Mangelsdorf	South Coast AQMD
222	3.6.1 Summary of MDRs	There is no summary of MDRs here.	Ken Mangelsdorf	South Coast AQMD
223	3.6.2 MDR Functional Requirements	This section has no meaningful information for the user.	Ken Mangelsdorf	South Coast AQMD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
224	3.6.3 MDR and the GUI	It would be more useful if the visual indicators showed: 1. Program only MDRs. 2. Program and system required MDRs. 3. System only required MDR's. If the fields are identified this way, the system only fields could be given a default or "Not Available" option so the Program required MDR data could still be submitted. Otherwise, users are put in a position of not entering data, or choosing an option that doesn't apply just to enter the data they do have.	Chris Cote	Ventura County APCD
225	3.6.3 MDR and the GUI	This section has no meaningful information for the user.	Ken Mangelsdorf	South Coast AQMD
226	3.6.4 MDRs and the Data Element Dictionary	This section has no meaningful information for the user.	Ken Mangelsdorf	South Coast AQMD
227	3.7 Electronic Documents	Documents are useful and support the internal workings of an agency. ICIS-AFS seems to have been developed to be used as an agency's primary system. For EPA this would be the case. However, most states/locals have their own data systems and document storage can vary. The district's documents are kept in different formats. Inspection reports can be Word documents or hardcopy checklists; Title V permits are a combination of Word documents where each section is a separate document; all other permits can be printed out but don't exist electronically; photos are kept in separate files. Because of the way documents are stored there wouldn't be an option to use XML to transfer documents to a repository. In addition, our system is not CROMERR compliant. Who would convert/map the documents for an electronic repository? This sounds like a large project that wouldn't support/enhance the district's operation. Please keep in mind that California districts do not receive any funding for any AFS related work. So, any work to convert/transfer documents to a repository would be extra burden.	Chris Cote	Ventura County APCD
228	3.7 Electronic Documents	This section has received a lot of attention however, I am not sure how important it is when it is barely 3 pages long and appears to be the cornerstone of the future for ICIS-AFS.	Ken Mangelsdorf	South Coast AQMD
229	3.7.1 Regulated Community			
230	3.7.2 Regulatory Agency			
231	3.7.3 Modernization Considerations	Which documents would be housed in these electronic storage? Will this result in delegated agencies having to submit copies of documents to EPA along with the data currently entered into the database?	Kayra Johnson	MS DEQ

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
232	3.7.4 Electronic Documents Functional Requirements			
233	3.8 Security	Page 353, top: Sensitive refers to enforcement sensitive. We need to explain that the use of the term sensitive in the following section is shorthand for enforcement sensitive.	David Meredith	EPA/OECA/OC/E TDD/DSIMB
234	3.8 Security	No comments on this section	Ken Mangelsdorf	South Coast AQMD
235	3.8.1 User Profile Form	The user profile will be very useful in determining the data that a user will review and also pre-populate fields. 1. The reporting/reviewing universe that a user views can be based on a profile. If someone has a state or LCON on their ID, the system should be able to pre-sort the facilities to C39eir area. This will save the users time. 2. The user profile can enter data in some fields like the lead agency. Of course users should also have to option to view data in other geographic areas if they need to but it will really help to focus in on the desired area. Legacy AFS directs users to facilities by requiring the state/county/facility number.	Chris Cote	Ventura County APCD
236	3.8.2 Sensitive Data Policy	Broad comment affecting entire section; Minimize references to NPDES!! The AFS requirements need to stand on their own!! They should not be presented in such a way that leads the AFS reviewer to conclude (even if that is true to some extent) that these requirements are being evaluated against existing ICIS requirements and some accomodation and or compromise will ensue. If that occurs, that is a separate process, other than defining AFS requirements.	David Meredith	EPA/OECA/OC/E TDD/DSIMB
237	3.8.3 Summary of Security Modernization	This section says that ICIS-AFS will no longer support the concept of private data. That decision means that if states/locals/tribes want to keep violation data private, as counsel has directed us, that we will only be able to report violation data after the violations have been resolved.	Chris Cote	Ventura County APCD
238	3.8.3 Summary of Security Modernization	Page 356, 3.8.3: delete 'which was a legacy AFS problem.'	David Meredith	EPA/OECA/OC/E TDD/DSIMB
239	3.8.4 Security Functional Requirements			
240	3.9 System Administration	We have no system Admin rights.	Ken Mangelsdorf	South Coast AQMD
241	3.9.1 Summary of Sys. Admin.	Page 371, 3.9.1.2, User Adminstration, first sentence: Why can't AFS user default to have Air access in ICIS?? BTW...delete reference to NPDES.	David Meredith	EPA/OECA/OC/E TDD/DSIMB
242	3.9.10 News & Alerts Web Only			

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
243	3.9.2 Sys. Admin. Functional Requirements	Page 373, Table 3.9-1: Delete NPDES reference in row 1.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
244	3.9.3 Sys. Admin. Data Requirements	Table 3.9-2 has a number of system required fields. Will ICIS-AFS users complete the data in these fields as part of their User ID? Is the intention to have agencies add all this data for facility contacts? These fields are not MDR's and adding this data for facility contacts would not be possible.	Chris Cote	Ventura County APCD
245	3.9.4 Sys. Admin. Business Rule Requirements			
246	3.9.5 User Admin. Web Only			
247	3.9.6 Role Admin. Web Only			
248	3.9.7 Contacts Maintenance Web Only			
249	3.9.8 Reference Table Maintenance Web Only			
250	3.9.9 Logs Web Only			
251	3.10 User Support	We have sought help from Region 9, the AFS helpline, the AFS data fields, and sometimes other air districts, but not EPA headquarters. It seems that most feedback has been given from states/locals to EPA at the annual conferences, in workgroups, and ICR comments.	Chris Cote	Ventura County APCD
252	3.10 User Support	No comments on this section	Ken Mangelsdorf	South Coast AQMD
253	3.10.1 Summary User Support	Historically, change requests haven't worked. Up until recently, ECHO has not been helpful. However, in cases where the change requests were passed onto Region 9, the Region was helpful.	Chris Cote	Ventura County APCD
254	3.10.2 User Support Functional Requirements			
255	3.10.3 User Support Data Requirements			

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
256	3.10.4 User Support Business Rule Requirements			
257	3.10.5 User Change Requests			
258	3.11 Reports Introduction	Legacy AFS has an ad-hoc reporting function. The only reports we use are ad-hoc. The standard reports in Legacy AFS have not been useful. The new system will need a report writer that allows ad-hoc reporting. Since the reporting tool has yet to be determined, we will have to provide comments on the new tools that are considered.	Chris Cote	Ventura County APCD
259	3.11 Reports Introduction	**3.11 REPORTS INTRODUCTION** The Reporting function in ICIS-AFS allows users to retrieve and display data in either standard reports or through ad hoc reporting and querying. ICIS-AFS users will have the ability to report on Air data alone and also in combination with FE&C and/or NPDES data. Standard reports are pre-defined and are run to display widely used information. National Standard Reports for Air were run from the AFS Legacy system. **pre-defined and may contain prompt information to retreive commonly accessed information** Page 414 of SRS The reporting tool that will be employed in the modernized system has yet to be determined. Detailed information on these reporting methods is detailed in the sections below. ICIS-AFS will employ a modern reporting suite that offers a variety of capabilities that will facilitate ease of **are found in**	Tony Galati	EPA HQ
260	3.11 Reports Introduction	Page 415 reporting through increased transparency and improved report formatting. The following is a list of reporting tools that will be available in the modernized system: • User-friendly interface • Ability to schedule, share, and send reports **and Share reports** ← • Ability to share report queries • Drill-down reporting • Complex "where" clause logic • Ability to export report results to formats such as PDF, Excel, Comma-Separated Value (CSV) **XML** ← • Ability to create permanent and temporary variables ← **Permanent variables are objects, temporary are created in an ad hoc** • Ability to view column definitions ← **object definitions** • Ability to view valid values. ← **in query objects**	Tony Galati	EPA HQ

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
261	3.11 Reports Introduction	Page 416 • **Reporting Tool** It has not yet been determined which Reporting tool will be used in ICIS-AFS. The reporting tool that is ultimately selected will need to adhere to the requirements, for both Standard and Ad hoc reports, outlined in the following sections. The current ICIS reporting tool is Business Objects/Crystal Reports. **(Webintelligence and Crystal Reports)**	Tony Galati	EPA HQ
262	3.11 Reports Introduction	18. The system shall allow users to create permanent and temporary variables for ad-hoc reporting. **need clarification on Permanent variables?**	Tony Galati	EPA HQ
263	3.11 Reports Introduction	Page 418 **3.11.2.1 Reporting Interface** *semantic layer* The ICIS-AFS reporting tool will provide an interface that translates database names into English language names and that serves as the layer between the user and the data for ad hoc reporting. The information will be organized into Business Areas that correlate to individual modules. The following lists notional Air business areas and subareas that will be available in the ICIS-AFS ad hoc reporting solution. **Business language**	Tony Galati	EPA HQ
264	3.11 Reports Introduction	Page 420 Enforcement Actions Alleged Violation Files — FCEs, PCEs, Investigations / Enforcement Actions Enforcement Actions — FCEs, PCEs, Investigations / Alleged Violation Files / Enforcement Actions **should linkages here include Stack Tests, TV ACC and CEMs/EERs**	Tony Galati	EPA HQ

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
265	3.11 Reports Introduction	Page 421 **In ICIS need to differenciate facility information between FRS and Programmatic (AFS would be programmatic)** **Include Activity Type.**	Tony Galati	EPA HQ
266	3.11 Reports Introduction	Page 422 lists the Standard Facility and Geographic Input Criteria that will be available on all standard reports in addition to report-specific input criteria. Table 3.11-5. ICIS-AFS Standard Activity Input Criteria lists the standard Activity input criteria that will be available on all standard reports in addition to report-specific input criteria. Individual standard reports will be able to have additional input criteria befitting the report, but these criteria will be available to all reports. The criteria will be built to default to "All values" so that users do not have to enter specific criteria in a report unless those are the criteria they wish to use. **This needs a re-write, it is very hard to understand what is being described.**	Tony Galati	EPA HQ
267	3.11.1 Summary of Reports	We do not use any of the structured reports for any of our own work, so no comment	Ken Mangelsdorf	South Coast AQMD
268	3.11.2 Ad Hoc Reporting	This section will require a great deal of discussion. We use Ad Hoc reports exclusively and need clearer definition of how they will be available for query and extraction.	Ken Mangelsdorf	South Coast AQMD

For ID 265, the referenced table Page 421:

Criteria	Description
Facility Region	Region associated with the facility
Facility State	State associated with the facility
Facility LCON	LCON associated with the facility
Facility County	County associated with the facility
Nonattainment Area	Nonattainment area name(s) associated with the facility
Facility Name	Current or historical facility name
Facility Identifier	Facility unique identifier
FRS Identifier	FRS unique facility site identifier
Facility Current Default Classification	Default facility classification
Facility Current EPA Classification	EPA facility classification
Facility Current State Classification	State facility classification
Facility Current Pollutants	Pollutant(s) associated with the facility
Facility Current Air Programs	Program(s) associated with the facility
Facility Current Subparts	Subparts associated with the facility
Facility Current Operating Status	Most "active" current operating status of the facility's programs
Facility Universe	Reporting universe(s) associated with the facility
Activity Performed By Region	Region performing the activity (if an EPA activity)
Activity Performed By State	State performing the activity (if a State activity)
Activity Performed By LCON	LCON performing the activity (if an LCON activity)
Activity Pollutant	Pollutant(s) associated with the activity
Activity Program	Program(s) associated with the activity
Activity Subpart	Subparts associated with the activity
Include Sensitive Data? (Y/N)	Includes/excludes sensitive data; users without the sensitive data privilege will never be able to include sensitive data in report results

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
269	3.11.3 Standard Reporting	Betsy said that MDR reports were missing. I think we resolved but wanted to check to be certain.	David Meredith	EPA/OECA/OC/ETDD/DSIMB
270	3.12 Help	No comments on this section	Ken Mangelsdorf	South Coast AQMD
271	3.12.1 Summary of Help			
272	3.12.2 Help Functional Requirements			
273	3.12.3 Help			
274	4.0 Appendix A	Confusing notation on the entity diagrams. Needs clarification. We need more details on this.	Ken Mangelsdorf	South Coast AQMD
275	5.0 Appendix B	Our Tier 3 comments have been largely ignored. Comments were "accepted" but no action was taken, meaning they were ignored.	Ken Mangelsdorf	South Coast AQMD
276	6.0 Appendix C	This section is blank!	Ken Mangelsdorf	South Coast AQMD
277	7.0 Appendix D	Just a list of some of the acronyms.	Ken Mangelsdorf	South Coast AQMD
278	General Comments	Looking forward to the Modernized AFS system	Bernard McKee	NC DENR
279	General Comments	1. Although I specifically mention it in many comments below, anywhere in the documentation that is referring to Major, Synthetic Minor, or Minor sources, it should be clarified that it is referring to Title V status. Facilities are also considered Major, Synthetic Minor, and Minor under PSD/NSR regulations, but all of EPA's CMS and MDR requirements only look at Title V status. 2. BAH uses list boxes on its forms instead of combo boxes when there is a list of valid values that must be chosen. Combo boxes allow for more effiicent data entry because users can type the first character or two of a code or option and then select it rather than scrolling through long lists. As long as the program in which this system developed allows you to restrict the allowed values in a field, a combo box is much more user friendly than a list box. Plus, a combo box allows the remaining data choices to disappear, make the screen look more streamlined.	Christy Monk	Alabama DEM
280	General Comments	NOTE: The new system will probably be called ACES-Air Compliance and Enforcement System within ICIS.	Betsy Metcalf	EPA, OECA, OC
281	General Comments	Table Of Contents Missing Tier 3 Comments on: · Violations/Enforcement · Electronic Documents · System Administration · Unique Identifiers	Betsy Metcalf	EPA, OECA, OC

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
282	General Comments	NOTE: Consider creating Business Rules that concatenate Corporate and Facility Name in a combined Facility Name field. If the Chocolate Bayou facility of Shell Oil is called "Shell Oil-Chocolate Bayou" it will probably be easier to find in the database than just "Shell Oil" or "Chocolate Bayou".	Betsy Metcalf	EPA, OECA, OC
283	General Comments	NOTE: Table legends should be moved to the top of each table to ease reading. Many of the tables are multiple pages, requiring a reader to page several pages ahead just to understand the values provided. Additionally, Y/N is used quite a bit, but sometimes an "F" is added. I assumed that refers to Federal-only requirements. If this is not the case, then identification of the values used within tables should be provided.	Betsy Metcalf	EPA, OECA, OC

5.16   DRAFT CONFIRMED BUSINESS REQUIREMENTS REPORT COMMENTS

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
1	Cover Page	ICIS-AFS Draft Confirmed? Business Requirements Report	Chris Cote	Ventura County APCD
2	1.2.1	Pg 15 of 877 – Incidents – This is a new item/concept that was added after the final review of the Interim Updated SRS Document. The idea has merit; it just has to be optional for reporting purposes.	Chris Cote	Ventura County APCD
3	2.3 Batch Submission	Will a "replace" batch upload overwrite an "original creation date" for a record, and therefore potentially skew a state's reporting timeliness?	Dawn Minor/ Dennis Murphy	Delaware
4	3.1.1	Table 3.1-5 Pg 63 of 851 – Facility Type has been deleted. Was this added somewhere else?	Chris Cote	Ventura County APCD
5	3.1.1	Table 3.1-5 Items 17-19. Pg 63 of 877 – Corporate Entity fields were added and this will be helpful.	Chris Cote	Ventura County APCD
6	3.1.1	Table 3.1-5 Items 34-36. Pg 65 of 877 – UTM fields were added and this will be helpful.	Chris Cote	Ventura County APCD
7	3.1.1	Table 3.1-5 Item 55. Pg 67 of 877 – The current values for Attainment Status are limited to Attainment, Non-attainment and Unclassifiable. Will these values change when EPA is able to provide the actual attainment status values – Extreme, Severe, Serious, Moderate, etc.? Attainment Status is important because it is one of the few fields that helps differentiate the severity of the problem agencies are addressing. For example, the same type of equipment could be operating the same way in different regions. But, the equipment could be violation in one area and in compliance in a different area because the attainment status causes areas with more air pollution to impose more stringent standards. It is very difficult for the public to see the difference in the standards and therefore, the violations.	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
8	3.1.1	Table 3.1-6 Item 9 Pg 71 of 877 – "No Pollutant Identified" is replacing "FACIL" at Title V facilities. Will this also replace "ADMIN" at SIP facilities?	Chris Cote	Ventura County APCD
9	3.1.5	Pg 157 of 877 – 3.1.5.4 *Incident Business Rules*- This section applies to Incidents so "Permits" should be changed to "Incidents". Table 3.1-20 lists the business rules requirements that apply to ~~Permits~~Incidents. This table includes the business rules for data elements and error handling.	Chris Cote	Ventura County APCD
10	3.1.5	Pg 158 of 877 –Table 3.1-20. applies to Incidents so "Permits" should be changed to "Incidents". Table 5.16-1. ICIS-AFS ~~Permit~~Incident Business Rule Requirements	Chris Cote	Ventura County APCD
11	3.2.2	Pg 177 of 877 – The document confirms that entering Information requests will only be a new data requirement for Federal users and will optional for states/locals. This is good news. Entering Information Requests records will be a new data entry requirement for Federal users only. The Information Requests functionalities will be available for optional data entry for Delegated Agency users.	Chris Cote	Ventura County APCD
12	3.2.2	Pg 178 of 877 – Thank you for changing the values for Lead Agency. State Contractor, EPA Contractor, and EPA Grantee (not State) have been deleted from most sections in the document. (Table 3.2-2) However, I searched the document for Lead Agency and found these pages that need to be updated. Table 3.3-3 Item 7. Table 3.3-6 Item 6. Table 3.4-2 Item 12.	Chris Cote	Ventura County APCD
13	3.2.2	Table 3.2-4 Item 19 Column SR Pg 186-187 of 877 – This "F" should probably be a "Y". The agency valid values are consistent with the Lead Agency values so that's good.	Chris Cote	Ventura County APCD
14	3.2.3	Table 3.2-8 Item 8 Pg 222 of 877 – Thank you for adding test conducted by "Owner/Operator".	Chris Cote	Ventura County APCD
15	3.2.3	Table 3.2-8 Item 18 Pg 223 of 877 – Reporting the testing a parameter is a new item. Legacy AFS only required pollutants to be reported. It's good news that the pollutant only has to be reported if it fails.	Chris Cote	Ventura County APCD
16	3.2.3	Table 3.2-8 Item 19 Pg 223 of 877 – The proposed MDR shows that an Air Program only has to be reported if the test fails, while Legacy AFS requires all actions to have at least one Air Program. This is different.	Chris Cote	Ventura County APCD
17	3.2.3	Table 3.2-8 Item 33-34. Pg 224 of 877 – Since the Government and Non-government categories have been deleted from contacts, how will users be able to differentiate between the types of contacts?	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
18	3.2.4	Pg 247 of 877 – In #3 below, there's a requirement to enter the "Facility Reported Status". This is a new requirement. Legacy AFS required agencies to report a result for the ACC review but this was the result of the agency review – not what the company reported. • **Phased Approach for Entering TV ACC Records** Users will have the option to enter data for TV ACC records all at once or in phases: 4. Users enter the "parent" TV ACC record, which includes the Facility, Permit, and Review Period. 5. When a TV ACC is received by the Delegated Agency or the EPA Headquarters, the data for TV ACC Review Information are entered by each reviewer. 6. When a TV ACC review is completed, either the Delegated Agency or the EPA Headquarters can enter the status of the TV ACC, which includes the ==Facility Reported Status==, ~~Review Date Achieved~~, and Link to the TV ACC report.	Chris Cote	Ventura County APCD
19	3.2.4	Pg 247 of 877 – Conditional MDR is a new concept. • **Permit Data** In legacy AFS, Permit ID is not a minimum data requirement and additional permit data is not required to be entered. In ICIS-AFS, ==Permit ID ~~is a~~will be a conditional minimum data requirement== and users are required to enter Permit ID for a TV ACC record if the Facility has multiple Permits in order to correctly identify the TV ACC certification review period for the associated Permit. Users also are encouraged, but not required to enter additional data for the associated permit.	Chris Cote	Ventura County APCD
20	3.2.4	Pg 248 of 877 – This section has new items which are highlighted in yellow. I believe the Region was entering deviations that were reported by facilities. Reporting Excess Emissions is a new item that is not an MDR. • ==Did Facility ~~Identify Something is Wrong:~~ Report Deviations:== Users can specify whether the Facility had indicated ~~that something was wrong~~ deviations exist in the TV ACC report. • ~~Deviations: Users indicate if deviations exist as a result of the review.~~ • ~~Deviations with~~ Excess Emissions: ==Users indicate whether ~~deviations associated to~~ Excess Emissions exist as a result of the review.==	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
21	3.2.4	Pg 248 of 877 – This section has new items which are highlighted in yellow. It is a new requirement to add 1) the Facility's Reported Compliance Status, and 2) whether that status is Continuous or Intermittent. Which status is wanted? What the company claimed or what the agency found? • **~~TV ACC~~Facility Reported Compliance Status** In legacy AFS, results are tracked as In Compliance, In Violation, or Unknown for the TV ACC record. In ICIS-AFS, users may track the results of review by indicating whether the Facility Reported Compliance Status is Continuous or Intermittent in accordance to the TV ACC policy based on the TV ACC reviews.	Chris Cote	Ventura County APCD
22	3.2.4	Table 3.2-10 Item 7 Pg 248-249 of 877 – Permit ID has to be optional if the facility has one permit. Permit Conditions: This is a new data element and refers to the whole permit. It could be a lot of extra work to add the text of permit conditions to the system. Facility Reported Compliance Status: This is a new data element. Role: Is this for Government/Non-government? Or job title? Did Facility Report Deviations? This is a new data element. Excess Emissions? This is a new data element	Chris Cote	Ventura County APCD
23	3.2.4	Table 3.2-11 Item 9 Pg 251 of 877 – Facility Reported Compliance Status: is a new data element.	Chris Cote	Ventura County APCD
24	3.2.4	Table 3.2-11 Item 23-24. Did Facility Report Deviations? This is a new data element. Excess Emissions: is also a new data element.	Chris Cote	Ventura County APCD
25	3.2.5	Table 3.2-14 Item 39 Pg 274 of 877 – The following highlighted items are new. Event Type: is a new data element. Valid Values for CEM Downtime	Chris Cote	Ventura County APCD
26	3.2.5	Table 3.2-14 Item 40-41. Pg 275 of 877 – Event Sub-Type and Event Order Number: are new items.	Chris Cote	Ventura County APCD
27	3.2.5	Table 3.2-14 Item 42-43. Pg 275 of 877 – These are new items.	Chris Cote	Ventura County APCD
28	3.2.5	Table 3.2-14 Item 47-51, 53-54. Pg 277 of 877 – Event and Excess Emission fields are new items.	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
29	3.3.2	Table 3.3-2 Item 7. Pg 293 of 877 – These are fields for Delegated Agencies to use but they include Federal Statutes Violated. Federal Statutes is a Federal only field	Chris Cote	Ventura County APCD

ID	Client Req ID	Source Reference	Requirement
7.	N/A	SME meetings April 10, 11, 18, 19, and 23, 2012	The system shall display the following data elements on the Informal Enforcement Actions screen for Delegated Agency Users: • Facility ID • Facility Name • Unique Identifier • Enforcement Action Name • Enforcement Action Type • Achieved Date • Issued By • Agency Lead Indicator • Enforcement Agency Type • Enforcement Agency Name • Federal Statutes Violated • Program(s) violated • Subparts violated • Federal Facility Activity • Federal Facility Comment

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
30	3.3.3	Table 3.3-6 Item 14. Pg 319 of 877 – Proposed Penalty. Legacy AFS requires the Assessed Penalty and the proposed penalty is optional. ICIS-AFS is specifying the Proposed Penalty as a Program Required field.	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
31	3.4.1	Pg 340 of 877 – The corrected location is Pg 338 of 851 There are some typos near the bottom of this page. **Summary of Alleged Violation Files in ICIS-AFS** Some Alleged Violation Files functionality has been changed and improved from how it operated in legacy AFS to better align the system with users' business needs. A summary of such changes follows. • **Compliance Status is replaced with the Alleged Violation File** • Alleged ~~Volation~~Violation File (AVF) replaces the requirement to track compliance scenarios at the air program pollutant level. • **Day Zero Action renamed to Alleged Violation File** The Day Zero action is reported in order to utilize the ability to link characteristics of and activities related to a federally-reportable violation or a High Priority Violation. For example, AFS documents the violation type and pollutants involved in an HPV in addition to subsequent informal and formal enforcement actions. The AVF serves as the parent record of an alleged ~~violtion~~violation. The relevant air programs, air pollutants and status as a HPV will be attributes of the AVF. • **System-required entry of violation types for AVFs** Legacy AFS had fields for entering violation types when a non-HPV or HPV Day Zero action was entered, but ~~those~~the fields were not system-required. In ICIS-AFS, users will be system-required to enter at least one violation type ~~for an AVF file~~on all AVFs. The list of violation types will be modified ~~beyone~~based on the HPV criteria. The system will maintain a reference table that indicates whether a violation type is HPV, ~~FRV, or non-FRV and~~ considering the size of the facility. The system will use ~~that information~~the violation type and facility classification to roll up an overall policy indicator based on the worst of the associated violation types. The user will be able to manually override this system ~~generated~~~~generted~~generated indicator. ,	Chris Cote	Ventura County APCD
32	6.0 Appendix C	Appendix C Item No. 129 Also related to "Lead Agency" Pg 821 of 851 Ken Mangelsdorf of South Coast AQMD thought the term "Lead Agency" on the CMS screen is misleading and recommends having "Agency" only. EPA agreed with the recommendation to remove the word Lead from "Lead Agency". But, "Lead Agency" is in the Draft CBR 43 times.	Chris Cote	Ventura County APCD

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
33	8.1 MDR	Pg 844-845 of 851 – The Delegated Agency Pollutant Classification depends on the Class Size which depends on Attainment Status. Attainment Status may not be available for some time. (see table below)	Chris Cote	Ventura County APCD
34	8.1 MDR	Pg 845 of 851 – "All FCE's" must be referring to FCE's for CMS facilities or Tier I facilities. (see table below)	Chris Cote	Ventura County APCD
35	8.1 MDR	Pg 845 of 851 – All PCEs are a proposed MDR. This is not acceptable due to the increase in burden. (see table below)	Chris Cote	Ventura County APCD

Table for ID 33:

MDR Level	Current	Proposed MDRs for Delegated Agencies	Proposed MDRs for EPA
Facility Pollutants	Regulated Pollutant(s) within Air Programs	Regulated Pollutant(s)	Regulated Pollutant(s)
	Pollutant Classification	*Delegated Agency Pollutant Classification	EPA Pollutant Classification *[Note: EPA users will be system required to enter either a Delegated Agency or EPA classification in order to save the record]*
	Attainment Status		

Table for ID 34:

FCE Record	All FCEs	All FCEs	All FCEs

Table for ID 35:

PCE Record	PCEs were MDR when they became a discovery action for Day Zero actions or when PCEs "add up" to an FCE	PCEs will continue to be MDR when they became a discovery action for Day Zero actions or when PCEs "add up" to an FCE Proposed: *+ All PCEs*	All PCEs

ID	Section #/ Req. ID/ Table #/ Figure #	Comment				Submitted By	Organization
36	8.1 MDR	Pg 846 of 851 – None is an excellent idea. It doesn't make sense to clutter the system with requests for MSDS's.				Chris Cote	Ventura County APCD
		Information Requests	None	None	Information Requests		
37	8.1 MDR	Pg 847 of 851 – The proposed MDR's for Stack Test Conducted by and Stack Test Purpose must be data that EPA plans to collect from Test companies rather than state/local agencies. It helps that Air Programs and Pollutants only have to be reported on tests that fail.				Chris Cote	Ventura County APCD
		Stack Tests	All Stack Tests	All Stack Tests	All Stack Tests		
			Who Conducted/Who Observed	*Stack Test Conducted By	Stack Test Conducted By		
			Test Result	Stack Test Status	Stack Test Status		
				+ *Purpose of Stack Test	+ *Purpose of Stack Test		
				+ Date Stack Test Results were Reviewed	+ Date Stack Test Results were Reviewed		
				+ Parameter/Pollutant Tested (If Stack Test Status is "Fail", then users must enter)	+ Parameter/Pollutant Tested (If Stack Test Status is "Fail", then users must enter)		
				+ Air Program (If Stack Test Status is "Fail", then users must enter)	+ Air Program (If Stack Test Status is "Fail", then users must enter)		
				+ Parameter/Pollutant Test Result (If Stack Test Status is "Fail", then users must enter)	+ Parameter/Pollutant Test Result (If Stack Test Status is "Fail", then users must enter)		

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
38	8.1 MDR	Page 848 of 851 – Is Issued By referring to the agency who issued the notice or the person? It doesn't seem like an inspector's name would be relevant in a national system.	Chris Cote	Ventura County APCD

Informal Enforcement Actions	Notices of Violation	Notices of Violation **+ Any other Informal Enforcement Action**	Notices of Violation **+ Any other Informal Enforcement Action**
	Action Type (Type (Notices of Violation)/Lead Agency)	*Enforcement Action Type *Issued By	*Enforcement Action Type *Issued By

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
39	8.1 MDR	Page 848 of 851 – 1) Is Issued By referring to the agency who issued the notice or the person? It doesn't seem like an inspector's name would be relevant in a national system. 2) Legacy AFS uses "Date Achieved" on actions so this can be used for an addressing or resolving action. I'm not sure which this is item is referring to. As a guess, it seems that a Final Order Issued date is the closest match to a Mutual Settlement Letter date. This is an example of where the federal and local programs differ in terminology so it isn't easy or obvious to know what should be reported. 3) Why is the MDR changing from Assessed Penalty to Proposed Penalty?	Chris Cote	Ventura County APCD

Formal Enforcement Actions	Formal Enforcement Actions	Formal Enforcement Actions	Formal Enforcement Actions
	Action Type (Type/Lead Agency)	*Enforcement Action Type *Issued By	*Enforcement Action Type *Issued By
	Air Program Code(s)	*Program(s) Violated	*Program(s) Violated
	Date Achieved	One of the following: • Final Order Issued Date • Referral Date • Withdrawal Date	One of the following: • Final Order Issued Date • Referral Date • Withdrawal Date

ID	Section #/ Req. ID/ Table #/ Figure #	Comment	Submitted By	Organization
40	General Comments	There should only be 3 categories of data elements throughout the document: 1. Minimum Data Requirement (MDR)- Existing already approved MDR's from the 2012 ICR. 2. System Required- Needed in order to save the record 3. Possible Future Data Elements- data elements we would like to collect in the future; data elements that we will likely request in the future as an MDR. Additionally, the subset of conditional MDRs from the three categories above should be identified as "Conditional" and there should be an explanation on how/why that particular data element is conditional.	Michelle Torreano	EPA / OECA / OC / ETDD / DSIMB

6.0 APPENDIX C: WEBINAR COMMENTS

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
1	General	EPA Policy	Magen asked if the number of days to address an action will stay the same. Magen also asked if the Status will be noted, such as resolved or pending.	Magen Holloway, Bay Area, California	Alleged Violation File and Action Linking Overview	6/26/2012
2	General	EPA Policy	Gary noted that the removal of the Day Zero Date will impact milestones as it is used to calculate milestone date.	Gary Fischman, Allegheny County, Pennsylvania	Enforcement Action Overview	6/28/2012
3	General	EPA Policy	Ken noted that as a Local Agency, there are many levels of rules and regulations that must be enforced local, state, and equivalent federal regulations. Ken inquired about the reportability of instances where a major violation has occurred but not at a local level.	Ken Mangelsdorf, South Coast	Enforcement Action Overview	6/28/2012
4	General	EPA Policy	Louvinia inquired about the time frame for the reporting requirements if users are not required to enter initiating action information.	Louvinia Madison, Region 3	Enforcement Action Overview	7/9/2012
5	General	MDR	Rosemary inquired if new MDRs will be communicated prior to implementation.	Rosemary Busterna, Washington	Question and Answer	6/1/2012
6	General	MDR	Bernard wanted to know if there will be new MDRs for the new system.	Bernard McKee, North Carolina	Question and Answer	6/15/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
7	General	MDR	Diane wanted to confirm that there are no additional MDRs in Stack Tests.	Diana Spingler, Florida	Compliance Monitoring Overview	6/19/2012
8	General	MDR	Diana wanted to know if there will be new MDRs for TV ACC records.	Diana Spingler, Florida	Compliance Monitoring Overview	6/19/2012
9	General	MDR	Betsy stated that the Pollutant Tested, Air Programs, and Test Results should be MDRs. Additionally, users should be able to enter just the Air Programs that apply for the pollutant for that Facility, not all the Air Programs applicable to the pollutant.	Betsy Metcalf, EPA	Compliance Monitoring Overview	6/21/2012
10	General	MDR	Chris asked if Date Test Completed is a new MDR and requested that it not be an MDR. She also requested that the Agencies be notified of any additional MDRs.	Chris Cote, Ventura County, California	Compliance Monitoring Overview	6/21/2012
11	General	MDR	Jon noted that linking will add a signification amount of workload. He noted that linking was not included in the list of MDRs.	Jon Trout, Kentucky	Enforcement Action Overview	6/28/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
12	General	MDR	Jon asked if the activities will automatically link together since it's time consuming to link Enforcement Actions to Alleged Violations to generate the AVF data. Other participants also stated that the workflow in the current AFS and modernized AFS is too manual and very time consuming and they would prefer an alternative method to "linking". Although linking record together will provide informative data relationships, the participants felt that linking is an additional MDR.	Jon Trout, Kentucky	Question and Answer	6/29/2012
13	General	MDR	Jon expressed concern about inputting initiating action information as Kentucky does not currently record this information in their system. The primary concern is that they will have to submit new information.	Jon Trout, Kentucky	Enforcement Action Overview	7/9/2012
14	General	Air Program	John commented that Air Programs need to allow an "Other" and a free text field to enter Delegated Agency specific programs.	John Borton, Region 9 Mike Uhl, Clark County, Nevada	Web Overview	5/29/2012
15	General	Data Quality	Susan wanted to ensure that data quality is in place and there is a method to make corrections to the Delegated Agency's data as needed prior to migration.	Susan Weisenburg, Utah	Question and Answer	6/1/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
16	General	Enforcement Sensitive	John asked if user defined fields will be publicly available.	John Borton, Region 9	Facility Overview	5/31/2012
17	System Administration	Utilities	Deborah asked if a utility will be available in the modernized system for users to update a Facility ID due to duplicates or consolidated facilities. Other participants agreed that a utility similar to the existing one in mainframe AFS would be helpful.	Deborah White, Virginia	Web Overview	6/6/2012
18	System Deployment/Data Migration	Data	Louvinia inquired about the data that will be migrated into the modernized system.	Louvinia Madison, Region 3	Enforcement Action Overview	6/28/2012
19	System Deployment/Data Migration	Data Migration	Louvinia asked if there will be a way to marry the information currently in ICIS with the Air data.	Louvinia Madison, Region 3	Compliance Monitoring Overview	6/19/2012
20	System Deployment/Data Migration	Facility	Marilyn asked if archived Facilities will be part of data migration in the new system.	Marilyn Seymore, Idaho	Question and Answer	6/1/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
21	System Deployment/Data Migration	General	Rosemary asked whether the AFS mainframe will run concurrently with the new system when the new system initially deploys.	Rosemary Busterna, Washington	Question and Answer	6/1/2012
22	System Deployment/Data Migration	Unique Identifiers	Cindy inquired about the Unique Identifiers and when users would communicate which Identifiers they wish to use in the modernized system.	Cindy Troupe, Oregon	Batch Overview	6/4/2012
23	System Deployment/Data Migration	User Support	Jay noted the utility of a mapping that indicates when actions become attributes.	Jay Barkley, Mississippi	Enforcement Action Overview	6/28/2012
24	General	Graphical User Interface	John suggested that the ICIS-FE&C site should recognize a user's media and filter the Programs and data specific to the user's Program in their profile.	John Borton, Region 9	Web Overview	5/29/2012
25	General	Graphical User Interface	John commented that the user interface should not have more clicks than the mainframe.	John Borton, Region 9	Web Overview	5/29/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
26	General	Graphical User Interface	John questioned why EPA chose the ICIS format instead of the current AFS format. John expressed frustration with the ICIS-FE&C site because they are too many fields on the screen, and the drop down lists are too long.	John Borton, Region 9 Mike Uhl, Clark County, Nevada	Web Overview	5/29/2012
27	General	Graphical User Interface	John commented that the ICIS-FE&C site drop down lists are too long and that the drop downs for AFS users should be specific to the program.	John Borton, Region 9 Mike Uhl, Clark County, Nevada	Web Overview	5/29/2012
28	General	Graphical User Interface	Ken suggested that a type-down utility be implemented for all drop-down fields to ease the burden of web data entry. Other users noted, specifically for the LCON field on the Search Facilities Screen, they would like both the code and the description displayed.	Ken Mangelsdorf, South Coast, CA	Facility Overview	5/31/2012
29	General	Graphical User Interface	John commented that the fonts on each screen should be bigger.	Jon Trout, Kentucky	Question and Answer	6/1/2012
30	General	Graphical User Interface	Marilyn proposed the titles identifying the key data on the menu bars be more prominent so users can see it more easily.	Marilyn Seymore, Idaho	Question and Answer	6/1/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
31	General	Graphical User Interface	Susan provided positive feedback on the list boxes and drop down boxes, which will help decrease the amount of data entry errors in comparison to typing in mainframe codes.	Susan Weisenberg, Utah	Question and Answer	6/1/2012
32	General	Graphical User Interface	User inquired about the length of the comment fields displayed on the Facility screen.		Facility Overview	6/11/2012
33	General	Graphical User Interface	Dan suggested that the color of the Record Header be changed for readability.	Dan Sirsi, Ventura County, California	Alleged Violation File and Action Linking Overview	6/26/2012
34	General	Action Linking	Louis inquired about the lifecycle of the enforcement action and alleged violation file path.	Louis Fontaine, Maine	Enforcement Action Overview	6/28/2012
35	General	Action Linking	Louis inquired if the List of CM Activities will show all CM Activities, including historical information.	Louis Fontaine, Maine	Enforcement Action Overview	6/28/2012
36	General	Action Linking	Louvinia asked if AFS users would be able to link to ICIS-NPDES data.	Louvinia Madison, Region 3	Enforcement Action Overview	6/28/2012
37	General	Action Linking	Terri inquired about Enforcement Action and linking to Alleged Violation Files, and if it were visible on the GUI screens.	Terri Dykes, EPA	Enforcement Action Overview	7/9/2012
38	General	Contacts and Addresses	Ken requested that the Address and City Name fields be longer than those shown on the Notional Design Screens.	Ken Mangelsdorf, South Coast, CA	Facility Overview	5/31/2012
39	System Administration	Contacts and Addresses	Dennis stated that he would like to see Middle Name incorporated into the Names in the Contacts and Addresses.	Dennis Murphy, Delaware	Facility Overview	6/11/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
40	System Administration	Contacts and Addresses	Dennis inquired about the contact information that a user would enter if the owner of a Facility was in fact a corporation.	Dennis Murphy, Delaware	Facility Overview	6/11/2012
41	System Administration	Contacts and Addresses	Rachel inquired if managed contacts were individuals affiliated with the Facility or government officials.	Rachel Quill, Iowa	Facility Overview	6/11/2012
42	System Administration	Contacts and Addresses	Sam asked if the Mailing Label feature will be carried over to the new system; this feature allowed the capture of owner mailing addresses.	Sam Coston, New Mexico	Question and Answer	6/15/2012
43	General	Comments	Martha inquired about how many characters are allowed in comment fields.	Martha Makholm, Wisconsin	Web Overview	6/6/2012
44	General	Comments	Diane inquired if the Activities' comments can be deleted.	Diana Spingler, Florida	Compliance Monitoring Overview	6/19/2012
45	Search	AVF	Dianne requested that more information be included on the AVF search results screen (e.g., Result/Status, Date).	Dianne Spingler, Florida	Alleged Violation File and Action Linking Overview	6/26/2012
46	Search	Facility	Chris asked how Facilities can be searched by Region or State if the Facility IDs are no longer associated to the Region or State.	Chris Cote, Ventura, California	Web Overview	5/29/2012
47	Search	Facility	Sam suggested that Owner Name be part of the Facility Search so users can search all Facilities that belonged to a company.	Sam Coston, New Mexico	Question and Answer	6/15/2012
48	Search	General	Ken inquired if the Facility Name search was a partial string search and if wild card characters, such as percentages were allowable.	Ken Mangelsdorf, South Coast, CA	Facility Overview	5/31/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
49	Search	General	Eric asked if a wild card search is available on the search screens.	Eric Raisanen, Maricopa County, Arizona	Question and Answer	6/1/2012
50	Search	General	Magen noted that for the CA state system the Search Results Screen shows more detailed data. She also noted the utility of exporting search results into an excel file.	Magen Holloway, Bay Area, California	Alleged Violation File and Action Linking Overview	6/26/2012
51	Search	General	Theresa inquired if the search function could also be used to pull reports.	Theresa Adkins, West Virginia	Alleged Violation File and Action Linking Overview	6/26/2012
52	Search	Graphical User Interface	Rachel inquired about a user's ability to search on multiple criteria (e.g., State Code and NAICS code).	Rachel Quill, Iowa	Facility Overview	6/11/2012
53	Search	Graphical User Interface	Jon asked if users are required to enter all of the dates on the Search Compliance Monitoring screen.	Jon Trout, Kentucky	Compliance Monitoring Overview	6/19/2012
54	Search	Graphical User Interface	In reference to the Compliance Monitoring Search screen, Louvinia asked if users can search by just the dates.	Louvinia Madison, Region 3	Compliance Monitoring Overview	6/19/2012
55	Search	Graphical User Interface	Sam asked how many values are listed in the Pollutant search criteria on the Search Compliance Monitoring screen. He expressed concern that there would be too many pollutants to search for and it would take too long to find a pollutant.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/19/2012
56	Search	Graphical User Interface	Betsy asked if Air users search on Air data, will they get only Air data.	Betsy Metcalf, EPA	Compliance Monitoring Overview	6/21/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
57	Search	Graphical User Interface	Chris asked if it is possible to add LCON Number and Name on the Search Compliance Monitoring screen.	Chris Cote, Ventura County, California	Compliance Monitoring Overview	6/21/2012
58	Search	Graphical User Interface	Rachel asked if Pollutants will be mandatory on the Compliance Monitoring Search screen.	Rachel Quill, Iowa	Compliance Monitoring Overview	6/21/2012
59	Search	Graphical User Interface	Louis suggested the ability to view an AVF file itself from the "Linked to AVF?" column on the EA search screen.	Louis Fontaine, Maine	Enforcement Action Overview	6/28/2012
60	Search	Graphical User Interface	Magen suggested displaying the search criteria on the search results screen. She also inquired if users will have the ability to save search criteria.	Magen Holloway, Bay Area, California	Enforcement Action Overview	7/9/2012
61	Search	Graphical User Interface	On the Search Results Screen, Teresa noted that only the status date was viewable, not the action date itself.	Teresa Adkins, West Virginia	Enforcement Action Overview	7/9/2012
62	Batch	Unique Identifiers	Betsy emphasized that since the Action Number Generator functionality will not be incorporated into the modernized system, for Batch submissions users must supply this information within their files.	Betsy Metcalf, HQ	Batch Overview	6/4/2012
63	Batch	Unique Identifiers	John emphasized to other users that those who wish to create a new Facility via a batch transaction must assign a number/identifier to the Facility prior to submitting the batch file.	John Borton, Region 9	Batch Overview	6/4/2012
64	Batch	Unique Identifiers	Kayra inquired about the key value viewable in the Batch Response file Accepted/Rejected Reports.	Kayra Johnson, Mississippi	Batch Overview	6/18/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
65	Batch	Unique Identifiers	Magen expressed concern about eliminating the Action Number Generator utility. She stated that she often uses this functionality. The information from the Action Number Generator is manually transferred by downloading the Action Identifier information from AFS and transferring it to an excel spreadsheet. The spreadsheet is then incorporated into the Access Database. She admitted that the manual transfer could, at times, be tricky. If they are no longer system generated, will the action numbers be sequential and numeric?	Magen Holloway, Bay Area, California	Batch Overview	6/18/2012
66	Batch	Unique Identifiers	Using HPVs as an example, Magen inquired about linking activities and how that would be affected by user generated unique identifiers.	Magen Holloway, Bay Area, California	Batch Overview	6/18/2012
67	General	Unique Identifiers	Brian asked what data elements the system will use to identify that a record already exists.	Brian Fields from?	Batch Overview	6/4/2012
68	General	Unique Identifiers	Rachel wanted to know the purpose of the Unique Identifiers.	Rachel Quill, Iowa	Web Overview	6/6/2012
69	General	Unique Identifiers	Chris inquired if users would still have the option for the system to auto generate the unique identifiers.	Chris Cote, Ventura County, California	Alleged Violation File and Action Linking Overview	6/26/2012
70	General	Unique Identifiers	Christy suggested that Facility ID be included as a primary key for the record so that the unique identifier only has to be within that facility record rather than the entire jurisdiction.	Christy Monk, Alabama	Alleged Violation File and Action Linking Overview	6/26/2012
71	General	Unique Identifiers	Jay inquired if the AVF unique identifier had to be unique just for AFS Facility.	Jay Barkley, Mississippi	Alleged Violation File and Action Linking Overview	6/26/2012
72	Batch	Universal Interface	Rosemary asked if the Batch Overview will include the Universal Interface information.	Rosemary Busterna, Washington	Question and Answer	6/1/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
73	Batch	Universal Interface	Jeff inquired about the incorporation of the Legacy system compare pre-processor in the modernized system. Jeff stated that he uses the tool's 'dummy edits' as a Quality Control tool for the local system. He indicated the importance of being able to see a list of changes to the system resulting from a Batch submission using before and after data. Karen Gee from the PA DEP commented that they also use the Compare Pre-processor in a similar way.	Jeff Dye, Oklahoma	Batch Overview	6/4/2012
74	Batch	Universal Interface	Jon emphasized the importance of the validation step to the UI user as a tool to catch errors before submitting data, as well as to confirm that changes were made upon data submission. Jon inquired about the level of effort for States and Locals to generate and upload XML files and to make them compatible with their individual systems.	Jon Trout, Louisville, Kentucky	Batch Overview	6/4/2012
75	Batch	Universal Interface	Bernard supported the other users with respect to the Compare pre-processor, attesting to the utility of data checks before uploading information to AFS.	Bernard McKee, North Carolina	Batch Overview	6/18/2012
76	Batch	Universal Interface	Jon emphasized that prevalidation of data, via the before and after Compare Pre-processor reports, is an important function and used for a variety of purposes. He also emphasized the importance of the Compare Pre-processor to check to see if any issues need to be resolved before uploading information to AFS.	Jon Trout, Kentucky	Batch Overview	6/18/2012
77	Batch	Universal Interface	Kayra stressed the use of Compare pre-processor to ensure that all data are in the file, stating that the reports make it easier to find gaps in/erroneous data and correct the data before submitting to AFS.	Kayra Johnson, Mississippi	Batch Overview	6/18/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
78	Batch	Universal Interface	Tom added that a major cause of the errors that are identified as a result of the Compare pre-processor are attributed to the data files containing information that AFS does not want, requiring them to delete before being able to successfully submit the information.	Tom Lovell, Colorado	Batch Overview	6/18/2012
79	Batch	Universal Interface	Tom aired concerns about correcting errors in ICIS-AFS without the use of the Compare Preprocessor as well as the Edit functionality to check the correctness of data before submitting files to AFS without having to manually pull out all of the Failed transactions.	Tom Lovell, Colorado	Batch Overview	6/18/2012
80	Batch	Universal Interface	Betsy asked users to provide examples of having to manipulate AFS data manually rather than through updates of the source system in order to enter data into the UI. Karen Gee indicated that she has to manipulate Subpart data entry. Jeff from Oklahoma encounters issues with system generating 0's on actions. Brain Fields stated that he fixes problems in UI Validation in the import file. Brian also inquired if the XMLs will be generated via the UI.	Betsy Metcalf, HQ	Batch Overview	6/4/2012
81	Batch	Universal Interface	Theresa reiterated the utility of the dummy edit that allows users to resubmit data if it is incorrect.	Theresa Adkins, West Virginia	Batch Overview	6/4/2012
82	Batch	Plug-ins	Dennis indicated that the Nodes, open and en node, each have plugins for program-specific flows, which generate xml and send data to CDX. These plug-ins were built by funds from ECOS, and they would likely be willing to build additional plug-ins for the new data flows.	Dennis Murphy, Delaware	Batch Overview	6/4/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
83	Batch	XML	Karen stated that she is currently working with emissions inventory system on an issue that will not allow MS Access files to be converted into XML, due to the uniqueness of header information; a special tool was required. Karen inquired if the option to generate XML files from an access data base would be available in the modernized system. She indicated the utility of being able to use excel or access to create an XML file. Dennis Murphy suggested the team contact Carl Reverts, manager of the UIC program at EPA HQ to provide an Access database that has a set structure and generates XML that you need. Mike Uhl suggested each Agency create a template to be used to generate XML going forward. It will require a one-time effort.	Karen Gee, PA DEP	Batch Overview	6/4/2012
84	Batch	XML	Magen inquired if there was a more simplistic file format that users could submit to CDX for batch transactions.	Magen Holloway, Bay Area, California	Batch Overview	6/18/2012
85	Batch	XML	A user inquired about the Batch Identifier and if it was system generated.		Batch Overview	6/18/2012
86	Batch	XML	James asked if users will have the ability to submit HTML files generated from Access databases and submit those HTML files through batch.	James McCormack, California	Question and Answer	6/29/2012
87	Batch	XML	Dan inquired if users would be required to email zip files.	Sam Conston, New Mexico	Batch Overview	6/4/2012
88	Batch	XML	Martha inquired when schema information will be available to the users so that they can begin work on transfer programs.	Martha Makholm, Wisconsin	Batch Overview	6/18/2012
89	Batch	Nodes	Danielle inquired if users will have the use of a Validation/Test Node before submitting their data.	Danielle Overstreet, Washington	Batch Overview	6/4/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
90	Batch	History	Magen asked if it were possible to view a history of transactions/historical transactions without the use of the Batch ID.	Magen Holloway, Bay Area, California	Batch Overview	6/18/2012
91	Batch	Data	Bernard asked how comment fields will be entered via Batch.	Bernard McKee, North Carolina	Web Overview	6/6/2012
92	Batch	Action Linking	Jon inquired how linkages will work for batch users.	Jon Trout, Kentucky	Enforcement Action Overview	7/9/2012
93	Facility	Policy	Sam inquired if Delegated Agencies will be responsible for entering federal Air Programs into the new system.	Sam Coston, New Mexico	Question and Answer	6/15/2012
94	Facility	Unique Identifiers	Theresa was concerned that the Facility ID will no longer follow the current AFS ID numbering convention since it helped prevent incorrect data being entered. She also wanted to ensure that her State does not need to change their current way of numbering their Facilities.	Theresa Adkins, West Virginia	Question and Answer	6/1/2012
95	Facility	Unique Identifiers	Nattinee asked whether AFS IDs will go away in the modernized system.	Nattinee Nipataruedi, Alaska	Web Overview	6/6/2012
96	Facility	Data	Jeff questioned how to uniquely identify Facilities if they have the same name but are owned by different companies.	Jeff Dye, Oklahoma Mike Uhl, Clark County, Nevada	Web Overview	5/29/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
97	Facility	Data	Magen questioned whether the Facility ID will be smart numbers, auto-generated, or provided by the user.	Magen Holloway, Bay Area, California	Web Overview	5/29/2012
98	Facility	Data	It was mentioned that only one set of Lat/Long data is currently be captured while there can be multiple Lat/Longs for a source. It was also stated that current AFS accepts UTM data.	Ken Mangelsdorf, South Coast, CA	Facility Overview	5/31/2012
99	Facility	Data	Lou requested that county information be automatically populated when a specific city is entered.	Louis Fontaine, Maine	Facility Overview	5/31/2012
100	Facility	Data	John questioned if compliance statuses will be tracked.	Jon Trout, Kentucky	Question and Answer	6/1/2012
101	Facility	Data	Marilyn inquired if there is a limit on the number of NAICS Codes users can enter.	Marilyn Seymore, Idaho	Question and Answer	6/1/2012
102	Facility	Data	Bernard asked how the CMS Status will be tracked since Facilities will not have compliance monitoring statuses in the new system.	Bernard McKee, North Carolina	Question and Answer	6/15/2012
103	Facility	Data	In reference to the List Facility screen, Kayra wanted to know if the Associated Record flag means there are associated records in CAA or CWA.	Kayra Johnson, Mississippi	Question and Answer	6/15/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
104	Facility	Data	Kayra asked what should the Air Program's Shutdown Date be when submitting data via batch, the batch submission's Current Date or the date from the Delegated Agency's database?	Kayra Johnson, Mississippi	Question and Answer	6/15/2012
105	Facility	Data	Sam mentioned that the Zip Code field on the Add Facility screen should not be required since New Mexico has some Facilities that span across multiple Zip Codes and the field was left blank in mainframe AFS.	Sam Coston, New Mexico	Question and Answer	6/15/2012
106	Facility	Air Program	John inquired if there was a limit to the number of Air Program Subparts, as some sources (e.g.,.large refinery) can have many subparts.	John Borton, Region 9	Facility Overview	5/31/2012
107	Facility	Air Program	Referencing the Air Program List Screen, John inquired about the option to delete Air Programs.	Jon Trout, Kentucky	Facility Overview	5/31/2012
108	Facility	Air Program	John suggested removing the Subparts and Comments from the Air Program List Screens since a Facility can have many Subparts and could take up a lot of space.	Jon Trout, Kentucky	Question and Answer	6/1/2012
109	Facility	Air Program	Dennis inquired about the classification of an Air Program that is shut down then started up again.	Dennis Murphy, Delaware	Facility Overview	6/11/2012
110	Facility	Pollutant	Chris inquired about the population of Pollutant Start Date fields for migrated data.	Chris Cote, Ventura, CA	Facility Overview	5/31/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
111	Facility	Pollutant	Referencing the List Pollutants screen, it was noted that fields such as State Classification, did not acknowledge the existence of Local Entities	John Borton, Region 9	Facility Overview	5/31/2012
112	Facility	Pollutant	Ken inquired if EPA-specific fields, such as EPA classification, will be viewable by the Delegated Agencies.	Ken Mangelsdorf, South Coast, CA	Facility Overview	5/31/2012
113	Facility	Pollutant	Chris inquired if Class Size would be maintained according to Pollutant or Facility.	Chris Cote, Ventura California	Facility Overview	5/31/2012
114	Facility	CMS	Karen likes the ability to provide her own Facility ID but was interested in how the CMS will be associated to a Facility.	Karen Gee, Pennsylvania	Question and Answer	6/1/2012
115	Facility	History	It was reiterated from the previous Web Overview discussion that users would like the ability to enter and search for Company Name as well as Facility Name. Jeff commented that FRS currently only has one field dedicated to name and adding an additional naming field has the potential to cause problems.	Jeff Dye, Oklahoma	Facility Overview	5/31/2012
116	Facility	History	John requested that Historical names be tracked in the modernized system. John also suggested that in the Facility Search, if no results are retrieved for Current Facilities, the system search the history table before returning 0 search results.	John Borton, Region 9	Facility Overview	5/31/2012
117	Facility	Definitions/Verbage	Greg noted that certain large facilities, not classified as a Mega source, have multiple emission sources.	Greg Gjerde, San Diego, CA	Facility Overview	5/31/2012
118	Facility	Graphical User Interface	Michelle asked if the Facility Name/Identifier was viewable on each of the notional screens.	Michelle Kochheiser, Iowa	Facility Overview	6/11/2012
119	Facility	Graphical User Interface	Rachel inquired how a user would navigate from the list pollutant screen to the edit pollutant screen.	Rachel Quill, Iowa	Facility Overview	6/11/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
120	External Interface Systems	Facility	Dennis inquired about the outcome of a Facility that was associated with multiple programs. If a name change for a Facility occurs in FRS will the other programs be notified of the name change? Would the information in the other systems be automatically updated to reflect the changes in FRS?	Dennis Murphy, Delaware	Facility Overview	6/11/2012
121	Compliance Monitoring	MDR	In reference to the FCE, PCE, Investigation, and Information Request screen, Eric wanted to know when Actual End Date became an MDR.	Eric Raisanen, Maricopa County	Compliance Monitoring Overview	6/19/2012
122	Compliance Monitoring	Data	Louvinia asked if there will be a feature in the modernized system that is similar to the current "00" Action Type in mainframe AFS so Delegated Agencies can enter data for anything that does not fit into the defined Compliance Monitoring activity types.	Louvinia Madison, Region 3	Web Overview	6/6/2012
123	Compliance Monitoring	Data	In reference to the FCE screen, Chris proposed deleting the Multimedia Indicator field if Agencies are not using it.	Chris Cote, Ventura County, California	Compliance Monitoring Overview	6/21/2012
124	Compliance Monitoring	Data	Steve inquired if there is a place to enter PCE data.	Steve Tune, Arkansas	Compliance Monitoring Overview	6/21/2012
125	TV ACC	MDR	· In reference to TV ACCs, Sam suggested that Facility Reported Status should be an MDR and should be at the Review Information level, not on the summary TV ACC level.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/21/2012
126	CMS	Data	Chris asked if the system defaults the Date Removed from CMS Plan to the current date, can users override the system default date.	Chris Cote, Ventura County, California	Compliance Monitoring Overview	6/21/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
127	CMS	Data	Chris wanted to know why the Historical CMS data on the notional screen shows that a Next FCE Due Date is in three years when the CMS Frequency is two years.	Chris Cote, Ventura County, California	Compliance Monitoring Overview	6/21/2012
128	CMS	Data	Christy asked if the data captured on October 1st will be saved as the previous FY data or the next FY's data.	Christy Monk, Alabama	Compliance Monitoring Overview	6/21/2012
129	CMS	Data	Ken thought the term "Lead Agency" on the CMS screen is misleading and recommends having "Agency" only.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/21/2012
130	CMS	Data	Magen wanted to know if an FCE was performed on October 1, 2011, will the system know that on December 1, 2011, that FCE actually counts for the next fiscal year.	Magen Holloway, Bay Area, California	Compliance Monitoring Overview	6/21/2012
131	CMS	Data	Rachel inquired if users can override the Next FCE Due Date on the CMS screens.	Rachel Quill, Iowa	Compliance Monitoring Overview	6/21/2012
132	CMS	Data	Rachel wanted to confirm that the system will know that Facilities have until November 30 to enter their FCE data.	Rachel Quill, Iowa	Compliance Monitoring Overview	6/21/2012
133	TV ACC	Data	Isabel suggested flipping the Due Date and Review Date Achieved on the TV ACC screen.	Isabel Navoa, California	Compliance Monitoring Overview	6/19/2012
134	TV ACC	Data	Kayra asked whether batch users would need to enter the Reviewers information for TV ACCs.	Kayra Johnson, Mississippi	Compliance Monitoring Overview	6/19/2012
135	TV ACC	Data	Ken asked where the Submitted Date is on the TV ACC record. Ken also mentioned that the Review Date Achieved and Reviewed On Dates are confusing.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/19/2012
136	TV ACC	Data	On the TV ACC screen, Ken suggested changing the "Review Period Start and End Dates" to "Reporting Period Start and End Dates."	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/19/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
137	TV ACC	Data	Ken asked why there is a Review Status at the Reviewer level that still tracks In Violation, In Compliance, Unknown, and Pending when the Facility Reported Status is already tracking the TV ACC Status.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/19/2012
138	TV ACC	Data	On the TV ACC screen, Marilyn recommends renaming the "Manage Reviews" button to "See Summary."	Marilyn Seymore, Idaho	Compliance Monitoring Overview	6/19/2012
139	TV ACC	Data	Michael asked where the Permit ID data would come from on the TV ACC record.	Michael Floyd, Georgia	Compliance Monitoring Overview	6/19/2012
140	TV ACC	Data	Sam asked if users can enter more than 5 reporting periods for TV ACCs.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/21/2012
141	TV ACC	Graphical User Interface	· Additionally, the "Facility Reported Status" should be renamed to "What Facility Reported as the Status". · Also, the Review Status field should be removed since it was noted that EPA will not track TV ACC as "In Compliance, In Violation, etc." · Overall, Sam thought the various Status fields on the TV ACC screen were confusing and provided too much duplicated information.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/21/2012
142	Stack Test	Policy	Marilyn asked if Facilities will continue to submit hardcopy Stack Tests to the State.	Marilyn Seymore, Idaho	Compliance Monitoring Overview	6/19/2012
143	Stack Test	Policy	Sam inquired about entering Stack Test Method Codes that are at the state level and not the federal level.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/21/2012
144	Stack Test	Graphical User Interface	Chris inquired how users would enter the Stack Test screens to enter data.	Chris Cote, Ventura County, California	Compliance Monitoring Overview	6/21/2012
145	Stack Test	Graphical User Interface	Richard asked what the Link to Stack Test Report was.	Ross Winne, Georgia	Compliance Monitoring Overview	6/21/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
146	External Interface Systems	Notifications	Marilyn inquired if users will receive notification when electronic Stack Test data are available.	Marilyn Seymore, Idaho	Question and Answer	6/1/2012
147	External Interface Systems	Notifications	Betsy stated that there is no process to notify the Facility when the data are incorrect or incomplete in the ERT.	Betsy Metcalf, EPA	Compliance Monitoring Overview	6/19/2012
148	External Interface Systems	Notifications	Louvinia wanted to know how often the system will notify users that imported data are available.	Louvinia Madison, Region 3	Compliance Monitoring Overview	6/19/2012
149	External Interface Systems	Notifications	Ken asked how notifications will be sent to users to inform them on the availability of external data.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/21/2012
150	External Interface Systems	Data	Eric asked if the Allowable data will be available in the ERT.	Eric Raisanen, Maricopa County	Compliance Monitoring Overview	6/19/2012
151	External Interface Systems	Data	Ken inquired about the ERT's role in ICIS-AFS.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/21/2012
152	Stack Test	Data	Diana asked if a Stack Test's results are not available or inclusive, should users select "Incomplete" for Test Status.	Diana Spingler, Florida	Compliance Monitoring Overview	6/19/2012
153	Stack Test	Data	Kayra inquired if the Stack Test's Allowable Unit is a required data entry field.	Kayra Johnson, Mississippi	Compliance Monitoring Overview	6/19/2012
154	Stack Test	Data	Ken wanted to know how Agencies would notify EPA that a particular Facility is not required to submit Stack Test data.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/21/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
155	External Interface Systems	Data Quality	Diane inquired if imports from ERT/WebFIRE include updating of existing records, will ICIS-AFS delete existing records and add the record or update the existing records.	Diana Spingler, Florida	Compliance Monitoring Overview	6/19/2012
156	External Interface Systems	Data Quality	Jeanette asked if States will be able to flag Stack Tests from ERT as incorrect.	Jeanette Barnett, Missouri	Compliance Monitoring Overview	6/19/2012
157	External Interface Systems	Data Quality	Jeanette expressed concern that there could be duplicate Stack Test data if the data can be entered manually or imported from the EPA's electronic reporting repository.	Jeanette Barnett, Missouri	Compliance Monitoring Overview	6/19/2012
158	External Interface Systems	Data Quality	Ken inquired if Agencies should review Stack Test data before Facilities submit them to the ERT. Additionally, he wanted to know if Facilities will receive training on submitting Stack Test data to the ERT.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/19/2012
159	External Interface Systems	Data Quality	Laurel asked if users can change the data that have been imported from EPA's electronic reporting repository.	Laurel Carlson, Massachusetts	Compliance Monitoring Overview	6/19/2012
160	External Interface Systems	Data Quality	Louis commented that there needs to be a focus on the process to notify OAQPS to correct errors submitted to the ERT. He also recommended that States should be more involved with the development of the ERT.	Louis Fontaine, Maine	Compliance Monitoring Overview	6/19/2012
161	External Interface Systems	Data Quality	Marilyn inquired what the process is to correct the data if the data were entered incorrectly into the ERT but the attached hardcopy contained the correct data. Marilyn requested a flag to indicate the system should ignore the electronically imported Stack Test data and use the manually-entered data instead.	Marilyn Seymore, Idaho	Compliance Monitoring Overview	6/19/2012
162	Stack Test	Data Quality	Sam inquired about the process to update the Stack Test Results.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/21/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
163	External Interface Systems	Publicly Accessible Data	John asked if Stack Tests in ERT will be available in ECHO for public viewing.	Jon Trout, Kentucky	Question and Answer	6/1/2012
164	External Interface Systems	Stack Test	Ken inquired how printouts will be submitted for Stack Tests.	Ken Mangelsdorf, South Coast	Compliance Monitoring Overview	6/19/2012
165	External Interface Systems	Stack Test	Richard wanted to the option to opt out of using the ERT imported data, specifically Stack Tests.	Ross Winne, Georgia	Compliance Monitoring Overview	6/21/2012
166	External Interface Systems	Stack Test	Sam asked if EPA requires users to enter Test Plans into ICIS-AFS.	Sam Coston, New Mexico	Compliance Monitoring Overview	6/21/2012
167	Reports	Ad-Hoc Reports	Patrick asked if there's an ad-hoc query available to users to search on additional fields other than the ones listed on the Search Compliance Monitoring screen.	Patrick Pagano	Compliance Monitoring Overview	6/19/2012
168	Reports	Ad-Hoc Reports	James asked if there's a capability for users to write their own SQL queries instead of using the user interface in the reporting tool.	James McCormack, California	Question and Answer	6/29/2012
169	Reports	Ad-Hoc Reports	Ken stated that he has had problems with Business Objects and users won't be able to extract data if the relationships are not created in the universes and wants to ensure that the modernized AFS will not run into the same problems.	Ken Mangelsdorf, South Coast	Question and Answer	6/29/2012
170	Reports	Ad-Hoc Reports	Ken also expressed the desire for the ability to write his own SQL instead of using the report's interface.	Ken Mangelsdorf, South Coast	Question and Answer	6/29/2012
171	Reports	Data Quality	Ken wanted to be able to duplicate the current AFS reports in the modernized system and compare the data in the reports.	Ken Mangelsdorf, South Coast	Question and Answer	6/29/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
172	Alleged Violation Files	AVF	Jay inquired about the use of the AVF File; is the anticipation that users will create a file for each Violation? Or will users create one file and list multiple violations? Jay inquired about the date to be used to gauge the timeliness of data entry; What replaces Day Zero in the modernized system?	Jay Barkley, Mississippi	Alleged Violation File and Action Linking Overview	6/26/2012
173	Alleged Violation Files	FRV	Dawn inquired if (Legacy) AFS currently has a date associated with Federally Reportable Violation (FRV) records.	Dawn Minor, Delaware	Alleged Violation File and Action Linking Overview	6/26/2012
174	Alleged Violation Files	Data	Betsy commented that there are a number of activities that users would like to document/link (e.g., bankruptcy, meetings were held with the facility).	Betsy Metcalf, EPA	Alleged Violation File and Action Linking Overview	6/26/2012
175	Alleged Violation Files	Data	When linking multiple violations to an Alleged Violation File, can there be multiple resolving actions? If so, are there multiple resolving dates?	Chris Cote, Ventura County, California	Alleged Violation File and Action Linking Overview	6/26/2012
176	Alleged Violation Files	Data	Chris inquired about the Alleged Violation Determinate Date	Chris Cote, Ventura County, California	Alleged Violation File and Action Linking Overview	6/26/2012
177	Alleged Violation Files	Data	Dan inquired about the status date shown on the Linked Activities screen and noted that some activities have more than one date.	Dan Sirsi, Ventura County, California	Alleged Violation File and Action Linking Overview	6/26/2012
178	Alleged Violation Files	Data	Jay indicated that 'No Further Action' is a common resolving/addressing action.	Jay Barkley, Mississippi	Alleged Violation File and Action Linking Overview	6/26/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
179	Alleged Violation Files	Data	Chris asked if Air Programs will be populated with what is on the AVF.	Chris Cote, Ventura County, California	Question and Answer	6/29/2012
180	Alleged Violation Files	Data	Chris wanted to know if users need to go back to the AVF file and "close it" after entering the Air Resolve Date on the Enforcement Action screen, especially since Ventura County generally has one violation to one EA	Chris Cote, Ventura County, California	Question and Answer	6/29/2012
181	Alleged Violation Files	Data	James wanted an explanation of FRVs and non-FRVs.	James McCormack, California	Question and Answer	6/29/2012
182	Alleged Violation Files	Data	John inquired about which Actions will be replaced by the Alleged Violation File.	John Nwoke, Washington, DC	Alleged Violation File and Action Linking Overview	7/11/2012
183	Alleged Violation Files	Enforcement Sensitive	Magen inquired about the sensitivity of a record. At what point does a record become available for public view? Does the user have discretion to change the sensitivity of a record?	Magen Holloway, Bay Area, California	Alleged Violation File and Action Linking Overview	6/26/2012
184	Alleged Violation Files	Enforcement Sensitive	Magen asked if LCON users would be able to see violations submitted by both EPA and States.	Magen Holloway, Bay Area, California	Alleged Violation File and Action Linking Overview	6/26/2012
185	Alleged Violation Files	Enforcement Sensitive	Terri inquired about the information that is available to the public when an AVF is no longer Enforcement Sensitive.	Terri Dykes, EPA	Alleged Violation File and Action Linking Overview	7/11/2012
186	Alleged Violation Files	Unique Identifiers	Dianne inquired about the Alleged Violation File Identifier field structure.	Dianne Spingler, Florida	Alleged Violation File and Action Linking Overview	6/26/2012
187	Alleged Violation Files	Graphical User Interface	Betsy pointed out that an asterisk should accompany the Applicable Pollutants on the Notional Design Screen.	Betsy Metcalf, EPA	Alleged Violation File and Action Linking Overview	6/26/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
188	Alleged Violation Files	Graphical User Interface	Chris inquired about the following fields on the AVF Notional Design screens: · Applicable air programs – Are these the Air Programs associated with the Facility? · Applicable pollutants · National initiatives – Is there an option to select none? · Lead Agency	Chris Cote, Ventura County, California	Alleged Violation File and Action Linking Overview	6/26/2012
189	Alleged Violation Files	Graphical User Interface	Theresa inquired about the Alleged Violation File Identifier and suggested that the Alleged Violation Name accompany the identifier in the screen header.	Theresa Adkins, West Virginia	Alleged Violation File and Action Linking Overview	6/26/2012
190	Enforcement Action	Definitions/Verbage	Magen asked for clarification on the definition of a SEP.	Magen Holloway, Bay Area, California	Enforcement Action Overview	7/9/2012
191	Enforcement Action	Definitions/Verbage	The question was posed if an Initiating Action is the action in which the violation was revealed, such as Stack Tests, Title V ACC reviews, etc.	Susan Weisenberg, Utah	Enforcement Action Overview	7/9/2012
192	Enforcement Action	Data	Jay noted the challenge of reporting penalties collected. He stated that this is accomplished primarily to reflect revisions to the record.	Betsy Metcalf	Enforcement Action Overview	6/28/2012
193	Enforcement Action	Data	Chris noted that there was not an associated date field with the Final Order Penalty. She noted that there should be a Penalty Collected Date.	Chris Cote, Ventura County, California	Enforcement Action Overview	6/28/2012
194	Enforcement Action	Data	In the Air program, referral is considered an addressing action.	Chris Cote, Ventura County, California	Enforcement Action Overview	6/28/2012
195	Enforcement Action	Data	Jay noted the Federal Statutes Violated field did not exist in Legacy AFS	Jay Barkley, Mississippi	Enforcement Action Overview	6/28/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
196	Enforcement Action	Data	Jay inquired what the enforcement action types are.	Jay Barkley, Mississippi	Enforcement Action Overview	6/28/2012
197	Enforcement Action	Data	Jay inquired about the 'SEP?' box on the Notional Design Screen.	Jay Barkley, Mississippi	Enforcement Action Overview	6/28/2012
198	Enforcement Action	Data	Matt noted the following discrepancy between the modernized module and his Delegated Agency's system: NOV is considered an informal enforcement action. In Indiana, it is the beginning of a formal enforcement action.	Matt Chaifetz, Indiana	Enforcement Action Overview	6/28/2012
199	Enforcement Action	Data	If you have multiple NOVs can you have a single resolving action?	Ross Winne, Georgia	Enforcement Action Overview	6/28/2012
200	Enforcement Action	Data	James asked where users would enter additional SEP information.	James McCormack, California	Question and Answer	6/29/2012
201	Enforcement Action	Data	Jon inquired about the Initiation Date.	Jon Trout, Kentucky	Enforcement Action Overview	7/9/2012
202	Enforcement Action	Data	Magen inquired if Formal Enforcement Actions (EAs) for which further investigation shows the EPA must be recalled, would automatically close out Alleged Violation Files (AVFs)? Or would users have to separately close out the Formal EA and AVF?	Magen Holloway, Bay Area, California	Enforcement Action Overview	7/9/2012
203	Enforcement Action	Data	Magen posed a clarifying question: For proposed penalties, can users add the information later?	Magen Holloway, Bay Area, California	Enforcement Action Overview	7/9/2012
204	Enforcement Action	Graphical User Interface	Louis noted a number of asterisks fields, which indicates the data must be sent, for data fields that are not applicable to the Air program.	Louis Fontaine, Maine	Enforcement Action Overview	6/28/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
205	Facility	Unique Identifiers	John asked what the difference was between a Unique Identifier and a Facility ID.	John Nwoke, Washington, DC	Web Overview	6/6/2012
206	Facility	Subparts	Rachel asked where a Facility's subparts information will be stored.	Rachel Quill, Iowa	Web Overview	6/6/2012
207	General	Definitions/Ver bage	Brenda inquired what a child data record is.	Brenda Smits, WA	Web Overview	5/29/2012
208	General	Definitions/Ver bage	Don asked what the word "notional" means.	Don Fountain, Louisville, Kentucky	Web Overview	5/29/2012
209	General	Definitions/Ver bage	Greg asked for clarification on the difference between Classification and Attainment status.	Greg Gjerde, San Diego, CA	Facility Overview	5/31/2012
210	General	Definitions/Ver bage	Heinz asked for a definition of the EPA Greenbook.	Heinz Braun, Arkansas	Facility Overview	6/11/2012
211	General	Definitions/Ver bage	Diana wanted an explanation of the Copy function on the List Compliance Monitoring screen.	Diana Spingler, Florida	Compliance Monitoring Overview	6/19/2012
212	General	External Interface Systems	Magen posed a question on whether specific data fields will be discussed on External Interface Systems during this webinar.	Magen Holloway, Bay Area, California	Web Overview	5/29/2012
213	Reports	Exports	James inquired about the ability to export data from reports.	James McCormack, California	Question and Answer	6/29/2012
214	Reports	Technology	James asked what database engine, front-end, and reporting tool the modernized system will use.	James McCormack, California	Question and Answer	6/29/2012
215	Search	Facility	Based on his experience with FE&C, John suggested to other users that they recheck search criteria/parameters before adding a Facility.	John Borton, Region 9	Facility Overview	5/31/2012

No.	Module	Functional Category	Comments and Questions	Name and Affiliation	Session Title	Session Date
216	System Administration	User Roles/Functios	Rachel inquired whether data entry and viewing will be restricted based on the user's profile.	Rachel Quill, Iowa	Web Overview	6/6/2012
217	System Administration	User Roles/Functios	Rachel inquired about the limitations for a State user granted delete capabilities. Will they be able to delete any Facility throughout the United States?	Rachel Quill, Iowa	Facility Overview	6/11/2012
218	User Support	Documentation	Users asked if a Data Element Dictionary would be available.	Participants	Facility Overview	5/31/2012
219	User Support	Documentation	Matt requested that the source documents provide definitions (e.g., final and assessed)	Matt Chaifetz, Indiana	Enforcement Action Overview	6/28/2012
220	User Support	Documentation	James inquired if a data dictionary would be available to users.	James McCormack, California	Question and Answer	6/29/2012
221	Webinar	Logistics	Jeff asked for the Batch Overview presentation to be re-distributed. Jeff also asked if there a summary of all of the future presentations.	Jeff Dye, Oklahoma	Question and Answer	6/1/2012
222	Webinar	Logistics	Michelle asked if the Batch Overview would be on batch submission only or if it would include web data entry.	Michelle Kochheiser, Iowa	Question and Answer	6/1/2012
223	Webinar	Logistics	Theresa asked when the Alleged Violations and Linking session is scheduled.	Theresa Adkins, West Virginia	Question and Answer	6/29/2012

7.0 APPENDIX D: ACRONYMS

Acronym	Definition
AFS	Air Facility System
AVF	Alleged Violation File
C	Conditional
CAA	Clean Air Act
CASN	Chemical Abstract Service Number
CBI	Confidential Business Information
CBR	Confirmed Business Requirements
CDX	Central Data Exchange
CEM	Continuous Emissions Monitoring
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulation
CM	Compliance Monitoring
CMS	Compliance Monitoring Strategy
CMSC	CMS Category in AFS Mainframe
CMSI	CMS Frequency in AFS Mainframe
CPU	Central Processing Units
CSV	Comma-Separated Value
DA	Delegated Agency
DED	Data Element Dictionary
DMR	Discharge Monitoring Report
EA	Enforcement Action
ECHO	Enforcement Compliance History Online
EER	Excess Emission Report
EPA	Environmental Protection Agency
ERT	Electronic Reporting Tool
ETDD	Enforcement Targeting & Data Division
ETL	Extract, Transform, and Load
F	Federal
FCE	Full Compliance Evaluation
FE&C	Federal Enforcement and Compliance
FESOP	Federally Enforceable State Operating Permit
FIPS	Federal Information Processing Standard
FOIA	Freedom of Information Act
FRS	Facility Registry System
FRV	Federally Reportable Violation
FY	Fiscal Year
GHG	Greenhouse Gas
GSA	General Services Administration
GUI	Graphical User Interface
HPV	High Priority Violation

Acronym	Definition
HQ	Headquarters
ICR	Information Collection Request
IBM	International Business Machine
ICIS	Integrated Compliance Information System
ID	Identifier
IDEA	Integrated Data for Enforcement Analysis
LCON	Local Control Agency
MACT	Maximum Achievable Control Technology
MDR	Minimum Data Requirement
N	No
N/A	Not Applicable
NAICS	North American Industry Classification System
NC	North Carolina
NCC	National Computer Center
NESHAP	National Emission Standard For Hazardous Air Pollutant
NINN	non-ICIS/non-NPDES/non-Air
NPDES	National Pollutant Discharge Elimination System
NSPS	New Source Performance Standards
NSR	New Source Review
O&M	Operations and Maintenance
OAR	Office of Air and Radiation
OAQPS	Office of Air Quality Planning and Standards
OC	Office of Compliance
OECA	Office of Enforcement and Compliance Assurance
OTIS	Online Tracking Information System
PCE	Partial Compliance Evaluation
PDF	Portable Document Format
PM	Particulate Matter
PR	Programmatically Required
PSD	Prevention of Significant Deterioration
SEP	Supplemental Environmental Projects
SG	System Generated
SIC	Standard Industry Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SME	Subject Matter Expert
SR	Systematically Required
SRS	Substance Registry System
SRS	System Requirements Specification
TIP	Tribal Implementation Plan
TV ACC	Title V Annual Compliance Certification
UI	Universal Interface
URL	Uniform Resource Locator

Acronym	Definition
US	United States
XML	Extensible Markup Language
Y	Yes

8.0 APPENDIX E: EPA SRS REQUIREMENTS NOT MAPPED TO CBR REQUIREMENTS

AFS SRS Requirement Number	AFS Requirement Statement	AFS Requirement Category	Modernized Module(s)	Explanation for Exclusion from the Confirmed Business Requirements Report
5.2.2	The system shall allow batch submitters from Local, State, Territorial, Tribal, or Regional systems to view submissions to the Exchange Network via a "universal interface," validate and review entries, correct errors, and resubmit. The current Universal Interface will be replicated in the XML schema submission process to insure all current data quality requirements and checks are continued with submittals to the new system.	5.2 GENERAL INPUT DATA REQUIREMENTS	Batch	The Universal Interface will not be replicated in the modernized system. Utilities from the Universal Interface will be integrated into the modernized system.
5.7.4	When the corresponding Permit ID is entered for an Annual Compliance Certification Review, the system shall populate all due and received dates in the record.	5.7 PERMIT REQUIREMENTS	Permit TV ACC	In the modernized system, TV ACC Dates and Permit Dates are not related. The user may select to add TV ACC from the Permit screen, and the Permit ID for the TVACC will be automatically populated.
5.9.4	The system shall provide a window of all activities within the last twelve (12) months from the current system date that have been reported with results of "UNKNOWN". This window shall also be provided to any user with a compliance monitoring role upon initial log in to the system as a reminder.	5.9 COMPLIANCE MONITORING DATA	Compliance Monitoring	Compliance Monitoring activities will no longer use the result of "Unknown". Additionally, activities will be displayed in the operational environment indefinitely, not just the last twelve (12) months.

AFS SRS Requirement Number	AFS Requirement Statement	AFS Requirement Category	Modernized Module(s)	Explanation for Exclusion from the Confirmed Business Requirements Report
5.12.3	The system shall compare the EER data with the existing monitor data to ascertain if emission levels have been exceeded. If so, then the system will generate an HPV Day Zero, with date achieved marked as the date the EER was submitted to the CDX. The Discovery Date and Activity will be the EER report, with the date of the last day of the EER timeframe. The HPV Violating Pollutant(s) will be the pollutant reported on the EER, and the HPV Violation Type will be GC7. The plant compliance status will be "in violation", and the system shall generate a report to all geographic users of the area and the Regional System Administrator that a new HPV has been added.	5.12 CONTINUOUS EMISSIONS MONITOR INFORMATION	CEM/EER	Per the CEM/EER SME/Tier 3 meetings, the system will import all CEM/EER data and will not perform any calculations. Per AVF SME meetings, the system will not automatically generate any alleged violations.
5.13.1	The actual relationship with ICIS Compliance Assistance and the CAA AFS in ICIS has not been established. Should this be a functional portion of the CAA AFS system, all data entry needs to be coordinated so that there is no dual data entry for Federal users of ICIS, nor confusion of Business Object universes for users when creating reports.	5.13 COMPLIANCE ASSISTANCE TRACKING REQUIREMENTS	N/A	The Compliance Assistance functionality exists in ICIS-FE&C, and will not be developed as part of ICIS-Air.
5.13.2	The system shall have the capability to identify each compliance assistance initiative by a compliance assistance ID	5.13 COMPLIANCE ASSISTANCE TRACKING REQUIREMENTS	N/A	The Compliance Assistance functionality exists in ICIS-FE&C, and will not be developed as part of ICIS-Air.
5.14.4	RESULTS-VIOLATION FOUND: UNKNOWN: When a Compliance Monitoring Activity indicates violation is unknown, the user entering the value plus any other user in the geographic table plus Regional Personnel with roles of oversight in that area will receive a notification that a violation value has not been specified during each log on into the system until the status is updated to either "Yes" or "No".	5.14 WORKFLOW REQUIREMENTS (INCLUDES REVIEW PROCESSES)	Compliance Monitoring	ICIS-Air will not track Compliance Monitoring activities with values Yes, No, or Unknown.
5.18.5	National reporting reports	5.10 REQUIRED STANDARD REPORTS	Reports	National reporting reports have not been defined.

AFS SRS Requirement Number	AFS Requirement Statement	AFS Requirement Category	Modernized Module(s)	Explanation for Exclusion from the Confirmed Business Requirements Report

5.18.6	DATA QUALITY REPORTS: When a user submits data that the system perceives to be incomplete and/or erroneous, the system shall generate a report containing the subject data ad email it to the user to review/correction. Data Quality Reports shall identify the following:
	· Plant Names not meeting the EPA Data Standard
	  Addresses not meeting the EPA Data Standard
	  60 Days with no data entry (Notification to the User ID that no activity has been logged over the last 60 days)
	  Permanently Closed Facilities with no data entry for 5 years
	  Batch Uploads Over a Specific Period of Time
		5.10 REQUIRED STANDARD REPORTS	Reports	System Administration Report is a proposed standard report that will display a summary of data entered by a user. Audit Reports will also provide users will reports displaying rejected transactions/erroneous data. If existing or proposed standard reports do not meet user needs/requirements, an Ad hoc reporting functionality is available. Ensuring that fields are meeting the EPA Data Standard will be incorporated as part of design of the system.

5.20.3	The information system should incorporate pre-submission quality assurance tools. The current field checks should be included in the pre-submission tools. The tool should also provide the user with notice if actions are duplicated. Duplication is defined as a unique action reported more than one time on the same day.	5.20 BATCH IMPORT REQUIREMENTS	Batch	CDX will provide pre-submission validation of XML files. It should be noted that the 'Edit' capability in Legacy AFS will not be carried forward into the modernized system.
5.22.2	The system shall have the capability to integrate data (identified via facility lat/longs) with data from external sources such as the Weather Service, CDC, or HHS, so that it can be viewed through Geospatial tools for the purpose of analysis or decision making.	5.22 EXTERNAL SYSTEM INTERFACE AND INTEGRATION REQUIREMENTS	External Interface Systems	Per the External Interface SME meetings, ICIS-Air will store geospatial coordinates for the Facilities. ICIS-Air will leverage the FRS geospatial tools. A link to the FRS system will be available from ICIS-Air to display Facilities on a Geospatial tools.
5.23.2	The system shall leverage an instance of the Agency's Enterprise Customer Service Solution (ECSS) for Frequently Asked Questions functionality.	5.23 INTERNAL SYSTEM INTERFACE AND INTEGRATION REQUIREMENTS	N/A	The Online Help and User Guides will provide adequate user support.
5.23.4	The system shall have the capability to accept data conversion procedures and file formats currently in use through the Universal Interface in order to maintain the viability of submission processes.	5.23 INTERNAL SYSTEM INTERFACE AND INTEGRATION REQUIREMENTS	Batch	The Universal Interface will not be incorporated into the modernized system. The modernized system will only accept XML files for batch submissions. No file conversions will be provided at this time.
5.24.6	The system shall include Frequently Asked Questions (FAQs) with online access for users.	5.24 USER HELP AND TRAINING REQUIREMENTS	N/A	The Online Help and User Guides will provide adequate user support.

AFS SRS Requirement Number	AFS Requirement Statement	AFS Requirement Category	Modernized Module(s)	Explanation for Exclusion from the Confirmed Business Requirements Report
5.24.7	The system shall allow users to submit suggestions for new FAQs within the FAQ functionality.	5.24 USER HELP AND TRAINING REQUIREMENTS	N/A	The Online Help and User Guides will provide adequate user support.
5.25.2	The Frequently Asked Questions function shall be maintainable online and include the ability to index, add, edit, and delete entries. FAQs will be created using EPA enterprise software.	5.25 SYSTEM ADMINISTRATION AND DOCUMENTATION	N/A	The Online Help and User Guides will provide adequate user support.
5.29.9	Contingency Planning: CAA ICIS-Air will follow the ICIS procedures for implementation of a Continuity of Operations Plan (COOP).	5.29 SECURITY REQUIREMENTS	Security	This is not a system requirement; this is a Continuity of Operations Plan, which was not requested under Task 5.
5.33.1	The system will feature the ability to generate messages, emails, notices and other communications as necessary. Generally, the HQ System Administrator(s) and/or Regional System Administrator(s) should be able to send out communications as needed. Examples of communications required are: · Notification of a new compliance date for a MACT subpart · Information pertaining to system meetings, outages, announcements, or other information pertaining to system maintenance. Data quality notices pertaining to: · Activities that were noted with violation unknown. · Stack Tests with a pending result after 120 days. · EERs with violations (new HPV) · Data not meeting the EPA data standards.	5.33 AUTOMATED SERVICES	N/A	To augment the system outages and information provided via News and Alerts, GovDelivery will be leveraged to provide user information notification for programmatic information, per the System Administration SME and Tier 3 meetings.