

1. Please provide your contact information.

	Response Percent	Response Count
Name: <input type="text"/>	100.0%	23
Agency: <input type="text"/>	100.0%	23
Email Address: <input type="text"/>	100.0%	23
Phone Number: <input type="text"/>	91.3%	21
	answered question	23
	skipped question	0

Q2. What are your specific concerns with using the current Access-based ERT?

1	Invalid information submitted to ERT and made available to public. Air Districts being held accountable for facilities failure to properly use ERT	Dec 18, 2012 12:58 PM
2	Accuracy and editing data	Dec 17, 2012 6:50 PM
3	In addition to the comments with ERT in general (data integrity, duplicative reporting requirements, etc. found in the above referenced NACAA comments), all required inputs are not clustered conveniently and the system does not seem to be very intuitive. In addition, while not obsolete, Access is not the software of choice as we move forward. A review tool isn't quite the same as a field testing tool.	Dec 17, 2012 5:38 PM
4	We have not used it at this time.	Dec 17, 2012 5:21 PM
5	1. Integrating ERT into existing source test review process. Most SMAQMD source tests will not be in ERT format due to source type and size. 2. How to fulfill public information requests for source test data. 3. No access to raw file data, notes and strip charts.	Dec 17, 2012 4:42 PM
6	There is no capacity for state to verify or validate reported emissions data as a part of the reporting process.	Dec 17, 2012 4:01 PM
7	There is no capacity for state to verify or validate reported emissions data as a part of the reporting process.	Dec 17, 2012 4:01 PM
8	I currently do not use	Dec 17, 2012 1:42 PM
9	One concern is the limitations of Access in the number of users that are accessing this at the same time - also in the longevity of the support. However, will a web based program be compatible with all browsers and especially with the older browsers as states are likely to be slow in upgrading their systems due to budget constraints? Testing companies can justify upgrades to their systems - but states may not have that flexibility. Our main concern has always been that non quality-assured data being submitted to EPA for development of emission factors.	Dec 17, 2012 1:26 PM
10	a. We support EPA's strategic data management policy and global direction to utilize the XML format through the central data exchange. We believe the Access-based ERT system is incompatible with the XML/CDX system and is inconsistent with EPA's strategic direction. b. ERT data submittals are not quality assured by EPA before being downloaded to WebFire or accessible to the public. State/Locals cannot provide numerical quality assurance updates to ERT data submittals. Quality assurance is the backbone to sound compliance demonstration, enforcement and policy decisions. Has EPA implemented ERT and WebFire quality assurance procedures? c. Access is a cumbersome and outdated platform with severe limitations. i. It is not user friendly and it can lock up if the sequential data entry order is not followed. ii. Transferring one written report into 12 screens, 36 tabs and multiple attachments is inefficient. iii. Formulas are hidden within macros with no verification possible. iv. It has a finite number of EPA methods and performance specifications (PS) included (36 methods & 3 PS). It does not include other EPA methods, approved alternative methods, state methods or association methods such as: EPA - 6, 7, 9, 25, 201; CARB methods, NCASI methods, etc. v. Quality assurance capabilities are	Dec 17, 2012 11:21 AM

Q2. What are your specific concerns with using the current Access-based ERT?

limited to check boxes only. It does not allow States/Locals to update the numerical data after comprehensive review. vi. ERT file submittals can only be viewed with the ERT software. Individual files can exceed 50MB, often too large for email, which may require the use of a FTP site or similar. vii. Canned reports do not contain complete file submittal. d. What emission factor ranking system is EPA utilizing for WebFire? e. Other EPA agencies using the data without quality assurance procedures.

-
- | | | |
|-------|--|-----------------------|
| 11 | Age-legacy based system. MS Access Version issues-what happens if the next version of Access shows similar incompatibilities as previous versions have? ERT-version issues. How do we keep an up-to-date version on our desktop? Although there is a certain data flow present in the ERT (e.g., testplan->allows data input (does lack of approval cause data entry to be stopped?) There is a data flow issue associated with the ERT and CDX. How do we get notified. No one has tried to send us data directly for us to use. How does this DAQ do it's job in reviewing test data AND what changes are necessary to our procedures to accomodate the ERT? We don't know. We know companies are and have been using the spreadsheets for the old WebFire version. There may be a difference between tests used for emission factor development and those to demonstrate compliance with an emission limit. We have some concerns with CBI and our statutory requirements in CBI data handling. | Dec 17, 2012 10:15 AM |
| <hr/> | | |
| 12 | We would prefer only source test plans or reports that have been approved by the agency to be submitted via ERT. This will ensure the quality of the data submitted for the development of any specific emission factors. The agency has limited resources to review all the test plans and reports and currently recovers the cost of such reviews and due to resource limitations would prefer not to enter any data into ERT. Once it is approved, the agency provides an approval number that should be captured with the data submitted. It would also be useful to have the results on the ERT Submittal Search page show besides the company name, the location (State & County) where the facility is located. Ideally, it would be great if it could list the responsible air agency that reviewed the document. | Dec 14, 2012 7:17 PM |
| <hr/> | | |
| 13 | The process and method for review of ERT submissions by state officials are not well defined. This could lead to conflicting information in regards to whether the test was conducted correctly and whether the results are valid. The ERT could be used as an aid in a states review of tests; an easy way to populate a database. MS Access is not robust enough for a national database. | Dec 14, 2012 4:23 PM |
| <hr/> | | |
| 14 | The delegated authority (states) would not be able to determine compliance by using the uploaded documents. | Dec 14, 2012 1:22 PM |
| <hr/> | | |
| 15 | 1. Handoff/Management of reports in the review process: There is a high potential for multiple copies of reports to be floating around via email and on hard-drives and no structure for the path of review/approval. Access is not a good vehicle for this application. 2. The ERT requires too many details for each test/run without the ability to readily transfer/copy information. The source testers don't have time to fill it in. 3. there is no file structure to review the reports that have been submitted. The files need to have the meta-data available for searching. If you look at the list of reports it's totally unclear what facility has submitted information. Webfire pulls everything apart... there needs to be a search ability for the actual reports. | Dec 14, 2012 12:50 PM |

Q2. What are your specific concerns with using the current Access-based ERT?

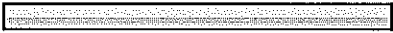
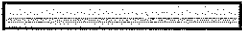
- 16 Primary concerns are the availability of a place to record special information required by the agency such as the production information that the local agency may require. Was the test conducted at 90% capacity? Some local agencies may have to build permit conditions around the tested capacity. If a company tested at 50% operating capacity because that was that days operation, but normally operates around 70% capacity, the test may not be a good representation of the plants emissions. Dec 14, 2012 12:28 PM
- 17 Utah state rules require that all required stack test reports be submitted to UDAQ for review. The ERT is just another step that stack test contractors will have to go through. The ERT will add to their reporting burden. UDAQ's stack test review process is very intensive and thorough. We often find errors which impact the accuracy and representativeness of the stack test data. If UDAQ were to use the ERT, it would make it extremely difficult, if not impossible, to review the stack tests for errors and other problems. And if we did find problems they will be extremely difficult, if not impossible to fix. The ERT takes away our state's ability to ensure that we obtain accurate and representative stack test data. We have had a terrible time getting errors fixed in AFS, because our error correction requests to EPA never seem to be their priority. The ERT creates nothing more than a big black box for stack test data. As usual, EPA prefers a path that makes it easier for them to collect data at the expense of the quality and usefulness of the data. No one at EPA is going to take the time to review the data entered into the ERT, they will simply look to see if a stack test result is there, regardless of the data quality. If the state's were required to use the ERT, those that actually review and use the data on a routine basis will be left on the outside looking in. With ERT EPA will have easy access to stack test data, but will that data be accurate and representative. The emission factors from Webfire are a prime example of this. There are emission factors in there, but they suck, and our NSR engineers are wary of using them. Dec 14, 2012 10:46 AM
- 18 Concerns below were discussed at the Region 4 Enforcement meeting his fall and were with regards to the Compliance and Emissions Data Reporting Rule (CEDRR) Expected in May of 2013 There are already 18 federal rules in place that require facilities to report to this system, which is not in place. Currently, system is not in place. Has been used in the past to report stack tests. EPA says that they are not even going to look at the data. It is just a compilation. We often review data and require resubmittals. Does that mean we will have 2 different sets of reports, state has a revised report, EPA has unrevised? Facilities are not going to want to upload data to EPA and then prepare a separate report for us. Basically, there is no implementation. 47 tests have been reported to this system. You have to have the latest version of Windows to get in to the system. Is it CROMERR compliant? Right now, we the delegated S/L agency are the administrator and we get all the semiannual and quarterly reports. How is this going to work if EPA wants those same reports submitted to this system? We need to know how this is going to be practically implemented We are going to have to require a hard copy or print it out ourselves. Dec 13, 2012 2:25 PM
- 19 We just want to make sure that we receive a copy of the test results for review to ensure a compliance determination can be made at the local level. Dec 13, 2012 11:31 AM
- 20 Our department requires original certification signatures and hardcopies of all stack test results from both major and minor sources. In addition, the sources owning the devices being tested generally prefer to retain a hardcopy of the test Dec 11, 2012 1:59 PM

Q2. What are your specific concerns with using the current Access-based ERT?

report. Having stack test consultants report results electronically through ERT would duplicate the hardcopy effort. Why can't EPA ask that state and local air quality agencies provide them with developed emission factors based on the stack test data and production rates during the test as a part of the agencies' review process, much like the BACT/RACT/LAER clearinghouse? Furthermore, I don't believe there is a provision in ERT to electronically provide the test protocol, a pre-test document which sometimes provides assumptions and other information needed to correctly interpret the test results that follow.

- | | | |
|----|--|-----------------------|
| 21 | Burdensome and unnecessary. The AIRS database should be updated first. | Dec 11, 2012 1:42 PM |
| 22 | security | Dec 11, 2012 12:00 PM |
| 23 | We will not receive data directly from facilities as we presently do. | Dec 10, 2012 3:01 PM |

If EPA were to update the ERT to a web-based application, would you use it?

		Response Percent	Response Count
Yes		61.9%	13
No		38.1%	8
		answered question	21
		skipped question	2

Q4. If not, why not?

1	We would use it only to the extent required.	Dec 18, 2012 12:58 PM
2	We would use it to review submitted data.	Dec 17, 2012 5:38 PM
3	Not enough source tests in our district to justify the effort.	Dec 17, 2012 4:42 PM
4	Possibly. In regards to stack test data, there must be a way for state agencies to review the data/reports for valid conclusions, methodology, representative operation, etc... Also, Colorado still wants to see test protocols and test reports at the state level. These docs house much more info than is required to be uploaded into the ERT, and help us determine how representative the test is.	Dec 17, 2012 4:01 PM
5	Possibly. In regards to stack test data, there must be a way for state agencies to review the data/reports for valid conclusions, methodology, representative operation, etc... Also, Colorado still wants to see test protocols and test reports at the state level. These docs house much more info than is required to be uploaded into the ERT, and help us determine how representative the test is.	Dec 17, 2012 4:01 PM
6	The data needs to be in a format compatible for access and extraction to the various compliance tools we currently utilize – spreadsheets and databases.a. We currently utilize an Oracle-based compliance tracking system that stores summary information from each report submittal, not the complete emission test report. b. We quality assure the data with customized spreadsheets. c. We create more quality assured documentation than a simple check mark.	Dec 17, 2012 11:21 AM
7	We selected "no" because we really cannot answer this question in a meaningful way. by just saying "yes." Does web-based mean doing all the plan entry, data entry, plan erview and test review by some web-based "fill-in the box" of some check-box system with a means to attach other report data? And how does that help us with our responsibility for erviewing the various components. If that could be answered, we would be open to it. On the plus side, updates would be automatic and in the background because you would always be using the "latest version"	Dec 17, 2012 10:15 AM
8	We would prefer not to enter data into ERT due to limited staff resources.	Dec 14, 2012 7:17 PM
9	A process analysis would have to be done to assess who plays a role in test submission and decision making. producers, evaluators and users would have to be included.	Dec 14, 2012 4:23 PM
10	We would have to.	Dec 14, 2012 1:22 PM
11	Maybe - if the concerns in #2 are addressed and the program becomes useable we would like to use it.	Dec 14, 2012 12:50 PM
12	See 2 above.	Dec 14, 2012 10:46 AM
13	Depends on whether it is required. If not, no, creates more work and our resources are limited.	Dec 13, 2012 2:25 PM
14	For the reasons cited in question 2 above.	Dec 11, 2012 1:59 PM
15	We (as an agency) require hard copies of test reports for review. Seems like an unnecessary duplication of effort.	Dec 11, 2012 1:42 PM

Q4. If not, why not?

16 As resources allow.

Dec 10, 2012 3:01 PM

Does your agency currently have, or is your agency currently in the process of developing, its own system for electronic reporting of stack test data?

		Response Percent	Response Count
Yes	<input type="checkbox"/>	17.4%	4
No	<input type="checkbox"/>	82.6%	19
		answered question	23
		skipped question	0

Q6. If so, please briefly explain your system's capabilities.

1	We are evaluating permitting software options including electronic reporting but do not have it at this time. We have a contract with LAKES environmental software but they are very tardy on their promised deliverable and we are not sure we will ever see the final product they promised. We are likely to get by with non-electron reporting systems we have in place.	Dec 17, 2012 6:50 PM
2	We are not formally 'in the process' but are in discussions on electronic reporting in general.	Dec 17, 2012 5:38 PM
3	descriptive and anaysis results	Dec 17, 2012 1:42 PM
4	We use the raw data in the report to verify the calculations and then input into out internal database prior to sending the summary to the AFS electronically. Once the ERT is in use, we can modify our system to work with the ERT.	Dec 17, 2012 1:26 PM
5	See number 4 above.	Dec 17, 2012 11:21 AM
6	We have limited capabilities. There aren't electronic submittal of data into a database. We are able to track test plans/protocols, the documents agency documents that reflect review and approval/disapproval, test observation, assignment of test review and suitability for compliance determination. We do input the test results (numerical values reflecting both the emission rates and emission limits where appropriate but these are not being uploaded to AFS. Our system does upload test dates and compliance staus to AFS from the data we submit to our database.	Dec 17, 2012 10:15 AM
7	We will be developing an oracle based database for stack test information but not electronic submissions.	Dec 14, 2012 4:23 PM
8	We are simply requiring that all source test plans and reports come in electronically to facilitate review circulation. We would like to incorporate the EPA ERT if the program becomes useable.	Dec 14, 2012 12:50 PM
9	Don't have the resources. I think data sharing for stack test data is a good idea if someone is reviewing it and making sure it is good data.	Dec 13, 2012 2:25 PM
10	I am not aware of any ADEQ system	Dec 11, 2012 12:00 PM