ICIS-Air Lookback/Questions

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April 27, 2016

1. Do states understand the specific elements that must be entered in ICIS-Air to enter MDRs? Do states feel adequately trained in the entry of MDR data to ICIS-Air?

   Although training from EPA Headquarters has focused on all aspects of ICIS-Air, including MDR data entry, it appears that there are still issues with ICIS-Air providing clear designations of what is an ICIS system required data field and what is a MDR is not clear. Most issues with MDRs relate to the creation of case files. One example relates to how to log in the violations details. The fields requiring population include violation type (HPV criteria), program and pollutant. Does one violation of two programs and two criteria pollutants get entered in the system separately as four separate violations? Another example is for states who enter all violations not just federal violations but wasn't taught a specific area or designation flag for FRVs from non-FRVs ICIS.

2. Do states understand the timing and sequence of entering a new facility in ICIS-Air? This would include entering an air program, pollutant, and a CMS code. Do states understand how these data link together to determine a facility's operating status and "current classification" (at the time of data entry)? In addition, do states understand how the timing of data entry might affect: a source's "end of year classification;" timing of next expected FCE; and applicable ECHO SRF metrics?

   For example, one state erroneously created a Major Title V source because the data entry to ICIS-Air occurred in the wrong order. Although the error was discovered, the source cannot be removed as a Major Title V source for at least a year. As a result, the source continues to show up in the system and requires data caveats during data verification.

   Not clear on the timing required for creating or closing a site/program. It was noted during one of the ICIS Air monthly calls as well as the quarterly meeting with EPA that this could be an issue. Our meeting with EPA region 1 seemed lean towards creation and editing of sites and programs as they occur. The national calls and information seem to indicate that this data entry should be done after the fiscal year closes?

3. Do states understand that the ECHO queries used to create SRF metrics often filter data differently than the standard ICIS report queries? This means that data pulled from ECHO and data pulled from ICIS-Air may not match. Does this matter to the states?

   For example, a list of "Facilities with Formal Enforcement" from ECHO will be different than that same query in ICIS-Air if states have entered enforcement data for non-CMS sources. If states

only enter data for CMS sources, then the reports will be similar. We have heard that ECHO queries are used to create SRF metrics, which often filter data differently than the standard ICIS report queries.

4. Do states feel that ECHO adequately communicates and reflects all state activities to the public? Do states understand the difference between how activities at CMS sources are treated in ECHO vs activities at non-CMS sources? Do states understand the enforcement sensitive protections built into to ICIS-Air?

    For example, sources under formal enforcement will have an "in violation" tag. Enforcement actions often require sources to be on a compliance schedule; however, in ECHO sources will be displayed as "in violation." In fact, "in violation" is displayed quarterly, so if an action is resolved on the first day of a new quarter, the entire quarter will be displayed as "in violation."

5. Do states have concerns about the data verification and SRF metrics in ICIS-Air?

    Are there concerns about how States have voiced concerns that metric descriptions, while lengthy, can be confusing and do not always contain an adequate explanation of the baseline data of the metric. SRF metrics primary focus is on the CMS universe, however, some metrics focus on all actions in ICIS-Air.