EPA Electronic Reporting

Status, Experience and Trends – 2015

Speakers for Today's Session

Chris Hiltunen, P.E.
Field Services Department Manager
Bison Engineering

Nathan Bartow, PMP
Project Engineer
Bison Engineering

BISON
ENGINEERING, INC.

Current Electronic Reporting Programs

Trends and Observations

- Increase in electronic data and summary reporting to EPA

- Increase in industries subject to electronic reporting requirements

- Custom solutions for each new regulatory program

- Trend towards web-based solutions, away from local software installs

BISON ENGINEERING, INC.

Current Electronic Reporting Programs

- Acid Rain Program   via   ECMPS

- MATS Testing   via   ECMPS*

- GHGRP   via

- NSPS testing   via ERT, CEDRI,

- TRI   via TRI-MEweb,

Proposed Electronic Reporting and Recordkeeping for NSPS Sources

- Published in 80 FR 15100 on March 20, 2015

- EPA proposed to expand NSPS source reporting requirements

- Take effect 90 days after final rule published

- Claim no additional reporting, but state reporting remains unchanged; i.e. both paper and electronic reports may still be required of sources.

BISON
ENGINEERING, INC.

Proposed Electronic Reporting and Recordkeeping for NSPS Sources

Proposed Submittals

- Excess Emissions and Summary Reports

- Performance Test Reports
  - For ERT supported test methods only, continue to use hardcopy for others.

- RATA Reports

- Additional data as required by state agencies, via PDF.

BISON ENGINEERING, INC.

Proposed Electronic Reporting and Recordkeeping for NSPS Sources

- ERT sole available tool to generate submittal files to CDX/CEDRI

- EPA will release XML schema to allow third-party software to generate data files

  - Would allow DAHS or plant historians to generate files in lieu of ERT

Proposed Electronic Reporting and Recordkeeping for NSPS Sources

Benefits:

- Data availability
- Deduplication
- Standardization
- Remove Human Error
- Emission Factor Updates

Disadvantages:

- Steep learning curve, high labor/contract costs
- Initial duplication of submittals
- Potential capital expense
- And more…

BISON ENGINEERING, INC.

Electronic Reporting Experiences

- Each new regulatory program develops a new webpage or software tool
  - Little knowledge carry-over from tool to tool
  - EPA has developed better training for recent programs, e.g. eGGRT.
- Steep learning curves for some programs, e.g. Acid Rain and GHGRP
  - Familiarity with several hundred pages of detailed regulations beneficial

Electronic Reporting Experiences

- Buggy software solutions
  - Crashes and incompatibilities with Microsoft Access-based ERT
  - SQL database experience with networked ECMPS installation.
  - Slow response to electronic requests for help, phone calls may be quicker during working hours

BISON
ENGINEERING, INC.

Electronic Reporting Experiences

- "Black-Box" calculations performed with no user visibility
- Automated/Minimum QA
- Duplicate Submittals
  - Plan additional time and costs to enter data electronically from hardcopy.
- Manual data entry
  - Error potential
  - Recovery issues

BISON
ENGINEERING, INC.

Electronic Reporting Experiences

- Initial software installations and account authorizations
  - Acid Rain and GHGRP Designated Representatives and Authorized Agents
  - Certificate of Representation
  - Interagency data
  - Electronic Signature Authorizations
    - Hardcopy forms required in some cases

Electronic Reporting Experiences

- Time Intensive Reporting
  - Some industries do their own reporting
  - Some consultants/CEMS contractors will do reporting for client
  - ERT stack test entry/upload for new user > 8 hours
  - Acid Rain Quarterly reporting > 12 hours
  - Plan ahead, allow lots of time before deadline

BISON ENGINEERING, INC.

Questions and Discussion

Nathan Bartow, PMP
Bison Engineering, Inc.

406-442-5768

nathan@bison-eng.com

Chris Hiltunen, P.E.
Bison Engineering, Inc.

406-442-5768

hiltunen@bison-eng.com

BISON
ENGINEERING, INC.