Speakers for Today’s Session

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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
Current Electronic Reporting Programs

- Acid Rain Program via ECMPS
- MATS Testing via ECMPS*
- GHGRP
- NSPS testing via ERT, CEDRI, CDX
- TRI via TRI-MEweb, CDX
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.
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.
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…
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
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
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
Questions and Discussion

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