

Electronic Source Test Reporting

Air & Waste Management Association Workshop

March 17, 2010

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Overview

- What is the ERT, how is it used
- Resource requirements
- Potential applications
- Future improvements



What is the ERT

- **Stand alone Microsoft Access application**
 - One application for those with MS Access
 - One “Run Time” program for those without MS Access
- **Standardized format**
- **Incorporates all information identified in Source Test Plan and Report Guidance**
- **Initiated by source or source test contractor**
- **Guides EPA/State review, assessment & comment entry and stores entries with information provided by source**
- **Generates export file for transmission to external data systems**



How is the ERT used by source

- Source fills out test plan and test report portions of ERT
 - May attach additional documentation
 - Limited number of “Required fields”
- Fills in fields EPA or State establishes as required “data fields”
 - ERT requires some critical fields to get past test plan
 - State or EPA fields flexible
- Several fields are drop down menus
- Some fields are open free text fields
- Current ERT provides a print version of a summary test plan and test report
- Project Data file produced by ERT is transmitted to Agency or data system (e-mail, FTP site, CDX*)



* future enhancement

How is the ERT used by EPA

- EPA or State establishes their required “data fields”
- EPA or State review is by check list with option for text comment (both test plan and test report)
- Review items provided but reviewer decides which items to evaluate
- Compare electronic and printed version of summary
- Current ERT generates an XML file of selected data elements for use by WebFIRE (the Emissions Factor data system)
- WebFIRE will import the data elements and the complete test file for factor calculation and support documentation
- ERT has many additional data elements that are used in several data systems (AIRS, NEI, etc.) but not currently exported



Resource Expenditure (existing)

- **Industry source testing**
 - Over 15,000 compliance tests per year
 - Estimated cost of \$150 million
- **State resources**
 - **Quality assurance oversight**
 - Field observations
 - Process observations
 - Test report evaluation
 - **Over 300 full time equivalent people***



* STAPPA/ALAPCO Survey by Dave Cline, Indiana DEM



Resource Expenditure (future)

- **Industry source testing increasing**
 - MACT, NSPS, NSR/PSD
 - SIP, State compliance
- **Increased emissions accuracy demand**
 - Use of test data in inventories
 - More and better emissions factors
- **State resources stagnant or decreasing**
- **Federal emissions factors development resources decreasing**

Possible increased public scrutiny of test data quality



EF Stakeholder Recommendations

- **Improve quality of test data while maintaining or reducing burdens**
 - Standardize reporting
 - Assess quality quantitatively
 - Automate manual transcription and evaluation processes
- **Employ electronic data management**
 - Increase transportability of data
 - Reduce storage space
 - Improve search-ability



Electronic Data Resource Implications

- **Report generation by source**
 - Same information required
 - Format same for all States
 - Potential reduction in resubmitted plans & reports
- **Report review by EPA or State**
 - Reduce data transcription time
 - Reduce data transcription errors
 - Allow for open sharing of data
 - Within State agency
 - Between States
 - Between States, Feds and sources
 - Reduce file storage space
 - Response times reduced



Possible Data Applications

- **Improve Emissions Factors**
- **Improve test report assessment for compliance evaluation**
- **Initiator of non-EF data flow**
 - Population of internal data systems
 - AIRS/AFS submissions
 - Emissions Inventory submissions
- **Use for emissions standards data**
 - State limits (non Federal, SIP)
 - Federal NSPS, MACT, NSR/PSD



Planned Improvements

- Make ERT CROMERR compliant
 - Develop capability for ERT submission through CDX
 - Recent MACT/NSPS standards are requiring electronic submission directly to EPA
 - ANPR identified potential revision of general provisions that will require electronic submission (Part 60, 61 & 63 test reports)
- Identify additional data fields for export routine
- Develop data definitions and formatting for import of lab data and export of data fields
- Expand test methods submitted by ERT
 - Methods 30B, 18, 320, 321, 0010, 0031
 - RATA's (and associated CEM data)



ERT Version 3.1 is Available



- Point of contact

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- www.epa.gov/ttn/chief/ert/ert_tool.html