

**Monitoring Plan and QA/Certification Draft Schemas
(Draft Ver 2.0, June 2005)
September 12, 2005**

Corrections to the Monitoring Plan schema and supporting documents should be included in the latest version of these documents which are available on the CAMD ECMPS Web site. Corrections to the Quality Assurance schema and supporting documents will be included in the next version of these documents which will be made available on the CAMD ECMPS Web site in September.

General Comments/Questions:

1. A number of data fields do not seem to be included in the new schemas, such as data related to alternative monitoring, QA test extensions/exemption claims, and rectangular ducts/stacks (RT 640, RT 641, RT 696 - RT 699, RT 532, RT 617). Will these be included elsewhere in the schema?

The record types which were listed will eventually have equivalent data elements added to the schema with a new schema release planned in 2006.

2. What does “Not Applicable” (“N/A”) mean in the EDR Reference column? Why was the EDR Reference changed from “Various” and “New” to “N/A” for a number of fields in Ver. 2.0 (e.g., in QA and Certification Test Schema Figure 49, “TestSummaryData”)?

The “Not Applicable” (“N/A”) designation in the EDR Reference column indicates that either an exact match between the data element and a single record type and column could not be made or there is no equivalent record type and column for that data element in the context of the complex data element. The designation of “Various” seemed to be too confusing, and in some cases the designation of “New” was inaccurate. Generally, the data element represented a reorganization of the data.

3. There are a number of new codes (e.g., fuel codes, test type codes, monitoring methodology codes) that have been added to the simple types. What is the timetable for release of Reporting Instructions that would explain these new codes?

New codes will be explained as part of the new reporting instructions which EPA plans to release (at the latest) with the beta version of the client tool. There may also be some new codes that are going to be added to MDC for more immediate use. EPA is planning to release an update to the EDR instructions later this Fall.

4. Are we correct in assuming that data elements calculated by the Client Tool will never override data provided by the user unless the user chooses to accept the Client Tool data?

Yes. Data elements which are calculated by the Client Tool will never override data which has been provided by the user.

5. What are the accepted tolerance levels used by the Client Tool? [Will the documentation that outlines the checks and checking logic of the Client Tool also show what the tolerance levels are?]

The documentation which describes the checks and checking logic will include information about the tolerance levels which will be used by the Client Tool.

6. Does EPA plan to ensure that all types of source configurations are included in the test phase of this effort (i.e., single stack, common stack, unmonitored bypass stack, systems with moisture monitors, etc.)?

In the alpha testing of the Client Tool, the number of configurations will be restricted due to the limited number of testers. During the beta testing period, the tool will be made available to all sources. This will provide the opportunity to test a much wider range of possible configurations. EPA has requested that stakeholders contact EPA if they are concerned about specific configurations. EPA has received some comments.

7. We recommend that EPA consider specifying a comment period with a deadline for each ECMPS draft document that is released. This would help prevent EPA from having to sift through comments on an older draft when a new draft is ready to be released. Likewise, it would help prevent commenters from potentially wasting time compiling comments on an older draft, when release of a new draft is imminent. This might also provide more incentive for comments to be supplied in a timely manner. Of course, comments received after the deadline could still be considered, in the event they raise important points that need to be addressed.

By the end of October 2005, all of the major schemas will have been released with corresponding test files. It is anticipated at that point, that there will be an extended period of time before the release of modified schemas. However, EPA welcomes comments on the schemas at any time.

8. Will EPA make an official copy of the proposed rules package available for stakeholder comment prior to the rules being sent to OMB?

EPA will not be circulating a pre-proposal draft of this rule package.

Comments/Questions on Draft Monitoring Plan XML Schema:

9. Reference: p. 28, Figure 31, “MonitoringSpanData”

- a. EPA has proposed that sources having dual-range analyzers indicate the scale transition point. Then for each hour of data collected, sources report whether the data is from the high scale or the low scale. We are concerned that the technology to implement this may not exist in every model of analyzer. We also understand that for some models of analyzers, the transition point may differ depending on whether the reading is moving from the high scale to the low, or the low scale to the high.

EPA is proposing that the set point that a dual-range analyzer transitions from the primary range to the secondary range be recorded in the monitoring plan. EPA is not proposing that sources report hourly which scale was used to collect the data. EPA has had conversations with analyzer vendors about this issue and understands that there only needs to be one point where this transition takes place. However, if there is a difference, EPA will use the primary to secondary switch-point as a reference.

Comments/Questions on Draft QA and Certification Test XML Schema:

10. Reference: p. 15, Figure 13, “CalibrationInjectionData”

- a. Consider adding a “Minutes” tag to the injection dates (“LowInjectionMinute” and “UpscaleInjectionMinute”), similar to the “InjectionMinute” tag in Figure 31, except their type would presumably be “OptionalMinuteType.”

EPA has not considered adding minutes to the reporting of calibration date and hour. This level of reporting is currently not required, but EPA does see the potential benefit of better defining the time that a calibration sequence was started and ended, since multiple cal sequences could be initiated in a single hour. Perhaps this is an issue for EPA to take feedback on at a future stakeholder meeting.

- b. Why is there an “OnlineOffLineIndicator” tag? The 7-day cal error test cannot be performed when the unit is off-line, can it?

This has been corrected.

11. Reference: p. 27, Figure 23, “FlowToLoadReferenceData”

- a. In the Definition for “CalculatedSeparateReferenceFlag,” the phrase “ratio were calculated” should be changed to “ratio was calculated.”

This has been corrected.

- b. Since load level was taken out, how does a second designated normal load level get indicated?

This has been corrected by adding `OperatingLevelCode` to `FlowToLoadReferenceData`.

12. Reference: pp. 29-30, Figure 25, “FuelFlowToLoadBaselineData”

- a. For the tag “NumberOfHoursExcludedCofiring,” the Definition should read “Number of hours excluded due to co-firing **or** combustion of a different type of fuel.”

This has been corrected.

- b. For the tag “NumberOfHoursExcludedRamping,” the Definition should read “Number of hours excluded **due** to ramping.”

This has been corrected.

13. Reference: p. 52, Figure 43, “RATARunLevelData”

- a. For the tag “Calculated WAF,” the Type should be “WAFType” to reflect a change made for Version 2.0.

This has been corrected.

14. Reference: p. 56, Figure 45, “RATASummaryDataType”

- a. The EDR Reference for “Calculated WAF” should be changed from “614:121” to “614:115.”

This has been corrected.

15. Reference: p. 57, Figure 46, “RATATraverseDataType”

- a. “VelocityCalibrationCoeffecient” should be corrected to “VelocityCalibrationCoefficient.”

This has been corrected.

16. Reference: p. 58, Figure 47, “RATATraverseDataType”

- a. “VelocityCalibrationCoeffecient” should be corrected to “VelocityCalibrationCoefficient.”

This has been corrected.

17. Reference: p. 61, Figure 49, TestSummaryDataType

- a. Would this type be used for reporting results of leak checks (formerly RT603)?

TestSummaryData is used for reporting Leak Tests.

- b. Would this type be used for reporting Reference Method Supporting Data for Flow RATA tests (formerly RT 616)?

No. Reference Method Supporting Data for Flow RATA tests is reported in RATASummaryData.

18. Reference: p. 64, Figure 51, “Transmitter/TransducerAccuracyDataType”

- a. For “LowLevelMethod,” “MidLevelMethod,” and “HighLevelMethod,” the Type should probably not be “AccuracyType” since that is a decimal value.

This has been corrected.

19. Reference: pp. 67-68, Figure 52

- a. There should probably be some consistency as to whether slashes are used in units. Right now, for example, “DensityUnitsOfMeasureType” indicates units without slashes (LBBBL, LBGAL, LBM3, LBSCF) while “GCVUnitsOfMeasureType” includes them (BTU/BBL, BTU/GAL, BTU/M3, BTU/SCF).

The units have been changed to not include slashes.

20. Reference: p. 74, Figure 52

- a. Some codes seem to be missing from “ReferenceMethodType” – i.e., 2, D2H, 6C, 7E, 3A, 4, ”7E,3A”, 20. Also, Wall Adjustment Factor information seems to be missing (e.g. codes 2J, 2FJ, 2GJ).

This has been corrected.

21. Reference: p. 75, Figure 52

- a. In the “Used By” column for “Indicator Type,” change “FlowToLoadReferenceData/CalculatedSeparateReferenceRatio” to “FlowToLoadReferenceData/CalculatedSeparateReferenceFlag” to reflect a change made for Version 2.0.

This has been corrected.

22. Reference: pp. 82-83, Figure 52

- a. What is the significance of the types that are prefaced with “Optional”? Why does an “optional” type not allow null codes? See “OptionalQuarterType” and “OptionalZeroHighType.” If nulls are not allowed, shouldn’t these be named “RequiredQuarterType” and “RequiredZeroHighType”?

[This has been corrected.](#)

23. Reference: p. 85, Figure 52

- a. In the “Used By” column for “ReferenceMethodType,” change “RATASummaryData/CO2OrO2ReferenceMethod” to “RATASummaryData/CO2OrO2ReferenceMethodCode” to reflect a change made for Version 2.0.

[This has been corrected.](#)

- b. “RequiredDateTimeType” was added to Figure 52 but no tags appear under “Used By.” Is this type used only by data elements generated by the Client Tool?

[RequiredDateTimeType is only used by data elements which are generated by the Client Tool.](#)

24. Reference: pp. 90-91, Figure 52

- a. Why would a “required” type allow null values? See “RequiredTestCodeType” and “RequiredTimeType.” Are these just configured to handle nulls for the time being, but will be changed when some new codes are defined?

[This has been corrected.](#)

25. Reference: p. 97, Figure 52

- a. Delete “WallEffectsType” from this table to reflect a change made for Version 2.0.

[This has been corrected.](#)

26. Reference: “Changes to Quality Assurance and Certification Test XML Schema Version 2.0” [Please confirm whether our understanding of the changes listed in this referenced document, as discussed below, are correct.]

- a. Item #8 indicates that the Basis Indicator validation type was folded into the generic Indicator Type validation type. In fact, it appears to have been folded into the generic TestBasis validation type.

BasisIndicatorType was removed, and TestBasisIndicatorType was removed and folded into TestBasisType.

- b. In Figure 1 of Item #9, “QACertificationEventData” should have been added to the Complex Data Element(s) column for Facility IDKey and ORISCode.

Yes, QACertificationEventData should have been added to the Complex Data Element(s) column in Figure 1.

- c. In Figure 2 of Item #10, “GracePeriodIndicatorIndicator” and “UpscaleGasLevelCode” were apparently not actually Validation Types that got renamed, but instead were just instances where tags had been mislabeled (in the “Used by” column of the “Simple Types Used for Validation” table and in the “XML Tag” column of the “CalibrationInjectionData XML Elements” table, respectively).

Yes. GracePeriodIndicatorIndicator was an element name in TestSummaryData which was renamed to simply GracePeriodIndicator. UpscaleGasLevelCode was an element in CalibrationInjectionData which was renamed to UpscaleGasCode.

- d. Figure 2 of Item #10 indicates that “RequiredLowMediumHighType” has been changed to “RequiredLowMediumHighNormalType” however nothing appears to have changed. The old name still appears in Figure 52, as well as in Figure 31 (“LinearityInjectionData”) and Figure 33 (“LinearitySummaryData”). The old name is apparently still in all of these places in the actual schema, too.

Yes. Both RequiredLowMediumHighType and RequiredLowMediumHighNormalType have been retained as simple types used for validation. The former is used to validate the GasLevelCode element in LinearitySummaryData, CalculatedLinearitySummaryData, and LinearityInjectionData. The latter is used to validate the OperatingLevelCode element in RATASummaryData.

- e. In Figure 2 of Item #10, “GrossHeatRateType” has not actually been renamed. It still exists and is distinct from “GrossHeatRateUnitsType.” Apparently all that was done was to correct the “Type” column entry on Figure 25 for “BaselineGHRUnitsOfMeasure” from “GrossHeatRateType” to “GrossHeatRateUnitsType.”

Yes. Both GrossHeatRateType and GrossHeatRateUnitsType have been retained as simple types used for validation. The former is used to validate the ReferenceGrossHeatRate element in FlowToLoadReferenceData and the BaselineGHR element in FuelFlowToLoadBaselineData. The latter is used to validate the BaselineGHRUnitsOfMeasure element in FuelFlowToLoadBaselineData.

- f. Item #11 includes a long list of validation types for which the pattern or validation codes were changed. It appears these were changed in the actual schema, but the schema table (Figure 52) does not yet reflect most of these changes. (Only the first six bulleted items in the list and “Required StackPipeType” and “RequiredUnitType” seem to have been updated in Figure 52.)

This has been corrected.