

## Response to John Gilmer Questions

### General

**Question:** Can you confirm that separate units are still reported in separate EDRs – that a facility that currently reports three separate EDRs will continue to report three separate XML EDRs?

**Answer:** Yes, XML-EDR's will be submitted on a monitoring configuration basis. That is to say that three separate units will be report separate Monitoring Plans, QA files, and Emissions EDR's in XML format.

### Monitoring Plan Schema

**Question:** We are struggling with the purpose of the start and end dates in the MonitoringPlan element. Usually, the presence of start/end dates tells us that there may be multiple records, each with different dates of effectivity. However, the MonitoringPlan element is the base element and may by definition have only once occurrence in the XML file. When do the dates change for this row?

**Answer:** This date is present for those instances where the monitoring plan configuration is changed. For example, had two separate units reporting separately (see the answer in the General section) but then built a new stack and rerouted the emissions through that new common stack. This configuration change would require the ending of the two separate 'Unit Level' monitoring plans and the creation of a new common stack configuration monitoring plan. All subsequent QA and Emissions files would be submitted in a single common stack format. During the transition period from old monitoring plan to the new one, it will be necessary to have both monitoring plans available in the Client Tool. When the transition is complete to the new monitoring plan, providing an end date will allow the user to recognize that the old monitoring plan no longer represents the current configuration.

### QA/QC Schema

**Question 1:** Will RT624 be reported in the TestSummaryData element?

**Answer:** Yes. There will be Test Type codes defined for each relevant RT 624 test (e.g., PEI for Primary Element Inspection).

**Question 2:** The dates for last flow meter accuracy test in RT 629 have been replaced by test numbers (AccuracyTestNumber, PEITestNumber) in FuelFlowToLoadBaselineData. We assume these will serve as foreign keys to

**the TransmitterTransducerAccuracy and FuelFlowmeterAccuracy elements. However, since there is no component ID in the FuelFlowToLoadBaselineData element, and since test numbers may be repeated for different components, we are not sure that we can report a test number that will allow EPA to reliably identify the correct accuracy test or PEI (consider a system consisting of both supply and return meters). We are also concerned that EPA may intend to begin requiring unique test numbers for these and other tests. Can you elaborate on the use of AccuracyTestNumber and PEITestNumber?**

Answer: As indicated in previous ECMPS presentations, test numbers will need to be unique by location (unit, stack or pipe) and test type. So they will be unique enough to link the FuelFlowToLoadBaselineData to a particular Accuracy or PEI test (which, in keeping with the current instructions, should be the last test conducted if the system contains multiple fuel flowmeters).

**Question 3: We were surprised to see that the baseline dates are not reported in FuelFlowToLoadBaselineData. Is this intentional?**

Answer: Those dates are provided in the TestSummaryData element and then FuelFlowToLoadBaselineData Element is linked to TestSummaryData by a test number.

**Question 4: In order to structure our own database and user interface, we need clarification on the relationship between TestSummaryData and CertificationTestData. We suppose that it is a 1 to 0 or 1, not a 1 to many. In other words a test reported in TestSummaryData may have a single child row reported in CertificationTestData, but never more than one. Is this your intent? If not, can you elaborate on the use of this element?**

Answer: The exact use of the Certification Test Data is still under development, but you are correct in that there would not be more than one CertificationTestData record for a single TestSummaryData record.

#### Emissions Schema

**Question 1: AppendixENoxRateData element: we assume MonitoringSystemID should be the NOx system ID. We further assume the ComponentID should be the fuel flow meter component, but which do you report for systems that contain more than 1 meter (supply and return)? The fuel flow system ID was formerly reported, not the component.**

Answer: Component ID has been removed from the AppendixENoxRateData element.

**Question 2: We understand the NOXC, NOXR and NOXM parameter codes, but what is "NOX" for?**

Answer: NOX is for NO<sub>x</sub> mass emission rate (lb/hr), reported in the DerivedHourlyValue element. This parallels SO<sub>2</sub> (lb/hr) and CO<sub>2</sub> (tons/hr). Note that NOXM is NO<sub>x</sub> mass (tons), reported in the SummaryValueData element.

**Question 3: We find ourselves doing a fair amount of speculation about which XML elements are to be used to report which RTxxx types, and about which ParameterCodes are to be used. Particularly in the case of the OverallParameterValueData element, there are no examples in the test emissions files. CO2 (RT202, RT210 and RT330) is also unclear. We have compiled this table with our guesses, and it would be enormously helpful if you would review and correct it.**

Answer: Here is an updated table:

Old RT	XML Element Name	ParameterCode	Comments
RT200	MonitorHourlyValueData	SO2C	
RT201	MonitorHourlyValueData	NOXC	
RT202	MonitorHourlyValueData	CO2C	If measured with a CO <sub>2</sub> analyzer
	DerivedHourlyValueData	CO2C	If calculated from an O <sub>2</sub> reading
RT210	MonitorHourlyValueData	CO2C	
RT211	MonitorHourlyValueData	O2C	
RT212	MonitorHourlyValueData	H2O	If measured with a moisture sensor or temp sensor and lookup
	DerivedHourlyValueData	H2O	If calculated from wet/dry O <sub>2</sub>
RT220	MonitorHourlyValueData	FLOW	
RT300	HourlyOperatingData		
RT301	SummaryValueData	SO2M, NOXR, CO2M, HIT, OPHOURS, OPTIME	
RT302	HourlyFuelFlowData and		
	HourlyParameterFuelFlow	HI	

(cont.)

Old RT	XML Element Name	ParameterCode	Comments
RT303	HourlyFuelFlowData and		
	HourlyParameterFuelFlow	HI	
RT307	SummaryValueData	NOXM	
RT310	DerivedHourlyValueData	SO2	SO <sub>2</sub> calculated from CEMS
RT313	HourlyParameterFuelFlowData	SO2	
RT314	HourlyParameterFuelFlowData	SO2	
RT320	DerivedHourlyValueDataNOXR		
RT323	AppendixENOxRateData		
RT324	AppendixENOxRateData		
RT325	OverallParameterValueData	NOXR	
RT328	DerivedHourlyValue	NOX	Calculated from all CEMS data
	OverallParameterValueData	NOX	Calculated from HourlyParameterFuelFlowData for HI and NOXR data (from either CEMS or Appendix E)
RT330	DerivedHourlyValue	CO2	CO2 calculated from CEMS
	HourlyParameterFuelFlowData	CO2	Appendix G hourly
	OverallParameterValueData	CO2	If using G-4A formula
RT331	DailyEmissionData	CO2D	