

2008 National Emissions Inventory

Emissions Inventory System Implementation Plan

Section 1 Introduction to the NEI and EIS

December 9, 2008

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Section 1

Introduction to the NEI and EIS

1.1 What Is the National Emissions Inventory?

The National Emissions Inventory (NEI) is EPA's compilation of estimates of air pollutants discharged on an annual basis and their sources. The compilation includes emissions estimates submitted by State, Local and Tribal air pollution control agencies, estimates calculated by EPA, and emissions obtained from other sources. It may include multiple emissions values for each pollutant. From the NEI, EPA creates the General Purpose Release, the publicly available emissions inventory that contains a single emission value for each pollutant at a given source. EPA uses the NEI to track emissions trends over time, develop regional pollutant reduction strategies, set and analyze regulations, perform air toxics risk assessments including inhalation risks and multi-pathway exposure, model air pollutant dispersion and deposition, and measure environmental performance as required by the Government Performance and Results Act.

This guide is for the 2008 emissions inventory cycle, which will use data collected for the year 2008 and will be published in 2010. Since 1996, EPA has compiled the NEI every three years. For 2008, the NEI business process has been reengineered to shorten the period between the inventory year in which data were collected and publication. The most recent inventory is the 2005 NEI, which was published in 2008.

1.2 What Is the Emissions Inventory System?

The Emissions Inventory System (EIS) is the new information system for storing all current and historical emissions inventory data. It will be used to receive and store emissions data and generate annual and triennial NEIs and General Purpose Releases beginning with the 2008 NEI.

1.3 What Regulatory Requirements Apply?

EPA published the Consolidated Emissions Reporting Rule (CERR) in 2002, which updated the regulatory basis for the collection of emissions inventory information. The full text is found at "40 CFR part 51, Subpart A - Emissions Inventory Reporting Requirements." (<http://www.epa.gov/ttn/chief/cerr/cerr.pdf>). The CERR established a deadline of 17 months from the end of each reporting year to submit the required data.

1.4 What Is NEI Business Process Reengineering?

The NEI business process has been reengineered for the 2008 inventory year. The focus of the reengineering effort was to identify ways to make the process for developing the NEI more efficient and to develop a new data system to create the NEI.

1.4.1 Business Process Reengineering

Business process reengineering involves understanding existing systems and business conditions, establishing improvement objectives, and preparing a strategy to move toward those objectives. The analysis process includes steps to collect, synthesize, analyze, and disseminate

information from existing systems and stakeholders. The resulting collection of information results in the preparation of an implementation and planning strategy for improvement processes. The planning process includes the identification of risk, measures of success, prioritization of program goals, constraints or standards, external requirements or dependencies, and other measures that are integral for the business system to implement the planned strategy for improved performance.

1.4.2 Need to Reengineer NEI

Working with NEI stakeholders, EPA identified improvements necessary for developing emissions inventories. Changes over time in the inventory production process have produced inconsistent rules and procedures, which data submitters have had to adopt. Creating and publishing the inventory required numerous manual steps that led to a lengthy delay between data collection and inventory publication. Limited tools were available to query and easily communicate the data to interested parties, including the public. Although improvements have been made to merge criteria air pollutants (CAPs) and hazardous air pollutants (HAPs) data, the inventory did not fully integrate these data to ensure that emissions from all pollutants were calculated using a consistent set of activity data. Over time, these issues accumulated and created a disjointed process that prevented a timely, consolidated emissions inventory.

1.4.3 Reengineering Objectives

The reengineering effort was guided by the following objectives:

1.4.3.1 Process Objectives

- Shorten processing time from 36 months to 18 months.
- Allow greater stakeholder access to reporting instructions, processing procedures, and validation information.
- Improve communications and outreach.
- Automate data management tasks.
- Eliminate preliminary inventory.
- Expand data tools and usability.
- Improve code management.

1.4.3.2 Emissions Inventory Content Objectives

- Add data categories.
- Improve facility inventory maintenance.
- Expand quality assurance.
- Better integrate pollutant species.
- Store activity data and model inputs.

- Store and report annual and seasonal data.
- Store historic emissions data.

1.4.3.3 Technology Objectives

- Conform to federal technical architecture objectives.
- Create additional test and development environments within EIS to reduce contractor reliance.

1.5 What Are the Key Results of the NEI Reengineering Effort?

- **EIS Facility Inventory.** The Facility Inventory was created from the existing point category by separating the information about a facility site from its emissions data. It is tracked with stable identifiers that will improve continuity from year-to-year and help to identify duplicate or missing facility sites. Users can view, update, and submit facility site information separately or at the same time as emissions data. If facility inventory data and emissions data are submitted at the same time, the facility inventory data will be processed first to ensure that any emissions for new facility sites, emissions units, or process are not rejected. Facility sites are identified with a permanent and unique EIS identifier. Crosswalk functionality relates facility site identifiers in the EIS to identifiers in other systems, such as the S/L/T facility site identifier, Facility Registry System and the Toxics Release Inventory.
- **EIS Gateway for Submitters.** State, Local and Tribal users (S/L/T) and other registered users, called submitters, can access the EIS database through the EIS Gateway. This access eliminates the uncertainty about the emissions inventory process and ensures that the entire process from submission to publication remains transparent to all users. In addition, it facilitates the updating and maintenance of facility inventory data, provides for review and download of emissions data, and makes available process procedures, reporting instructions, and validation information.
- **Data Identifying Sources and Methodologies.** Transparency is a key element in developing the 2008 NEI. The EIS database stores metadata describing the source of data in the inventory and the methodology used to calculate emissions.
- **Process Based on Categories of Emissions.** Previous NEIs relied on the use of the NEI Input Format (NIF), a more rigid single format into which S/L/Ts had to force their data. The reengineered NEI now has data elements, data structure, and reporting instructions specific to each of the data categories described in Section 1.12.
- **EIS Quality Assurance (QA) Environment.** The EIS contains a dedicated quality assurance environment to allow submitters to quality assure data prior to submission. The EIS QA Environment replaces the Basic Format and Content Checker used to check NIF-formatted Access files and the use of Schematron used to check NIF-formatted XML files. Sections 1.11.10 and 1.11.11 contain additional information on quality assurance.
- **Storing Multiple Emissions Values.** Previous NEIs contained only a single emission value for each pollutant for a given source. The EIS database will be able to store

multiple emission values for each pollutant at a given source. Multiple emission values exist because more than one entity measures or estimates emissions for many sources. For example, emissions of NO_x and SO₂ for certain electric generating units (EGUs) are reported directly to EPA by the EGUs as part of the Acid Rain and NO_x Budget trading programs. States also report these data to the NEI. In previous NEIs, only one of these values was stored regardless of whether the emission values differed. Storing both sets of emissions in the EIS database and making them available through the NEI will allow the comparison of emission values submitted by different data reporters and enable users of the data to download the most appropriate emission values for their specific application.

- **Use of Alternative Sources of Emissions Data.** Most emissions data submitted to the EIS will be from S/L/Ts. In past inventories, other sources of data were incorporated into the emissions inventory and were used in lieu of S/L/T data. These sources included EPA's Clean Air Markets Division (CAMD) Business System and Toxics Release Inventory (TRI). In the reengineered process for building the NEI, these alternative sources will be used to supplement where data were not submitted and will be used for quality assurance and analysis purposes. They will not be used to substitute for or replace reported S/L/T values.
- **NEI Public Website.** A public internet site will provide users access to a variety of data associated with the General Purpose Release through reports, queries, and downloads. Although the NEI is a compilation of multiple sources of emissions values, EPA will develop the General Purpose Release of the NEI that contains a single emission value for each pollutant at a given source. It will be developed by EPA based on data analyzed and selected to represent a set of emission values most appropriate for use by the general public. These data will contain a limited metadata set so that users can identify the source of the data, along with any references, caveats, or citations.

1.6 What Are the Reporting and Publishing Deadlines?

This section provides an overview of the process and timeline for the 2008 inventory cycle. Based on the reengineering effort, the process to generate the NEI has been streamlined and automated. The 2008 emissions inventory will rely more on data reported by S/L/Ts and submitters, and enhanced quality assurance processes will screen out incorrect data.

New tools, quality checks, and processes are available to assist submitters, reviewers, and data consumers in understanding the extensive data analysis and process information. Most of this information is made available through the EIS Gateway and a public website.

The EIS Gateway is a secure website through which registered users, including S/L/Ts and EPA Regions, have access to emissions inventory data and resources. The final General Purpose Release will be accessible through a public website for all public users, and will contain only selected and summary information. Since EPA will now provide access to the facility inventory, activity, and emissions data through the EIS Gateway, it will no longer "publish" a preliminary inventory at the beginning of each inventory cycle.

Although the inventory now contains distinct data categories with data management processes tailored to each, it is important to understand that the EIS remains a single system that creates an integrated, multi-pollutant emissions inventory. All the processes defined in this section advance the goal of having a consistent set of emissions data across all categories of data.

1.6.1 Submission Timeline

To address concern shared by most stakeholders that the development process for the NEI was too long, EPA committed to streamlining and automating the process so that the NEI would be generated approximately seven months after the end of the submission period. To achieve this, EPA developed a revised timeline featuring well-defined steps and responsibilities for both data submitters and EPA. The 2008 NEI timeline is divided into the following four periods shown in Figure 1-1.

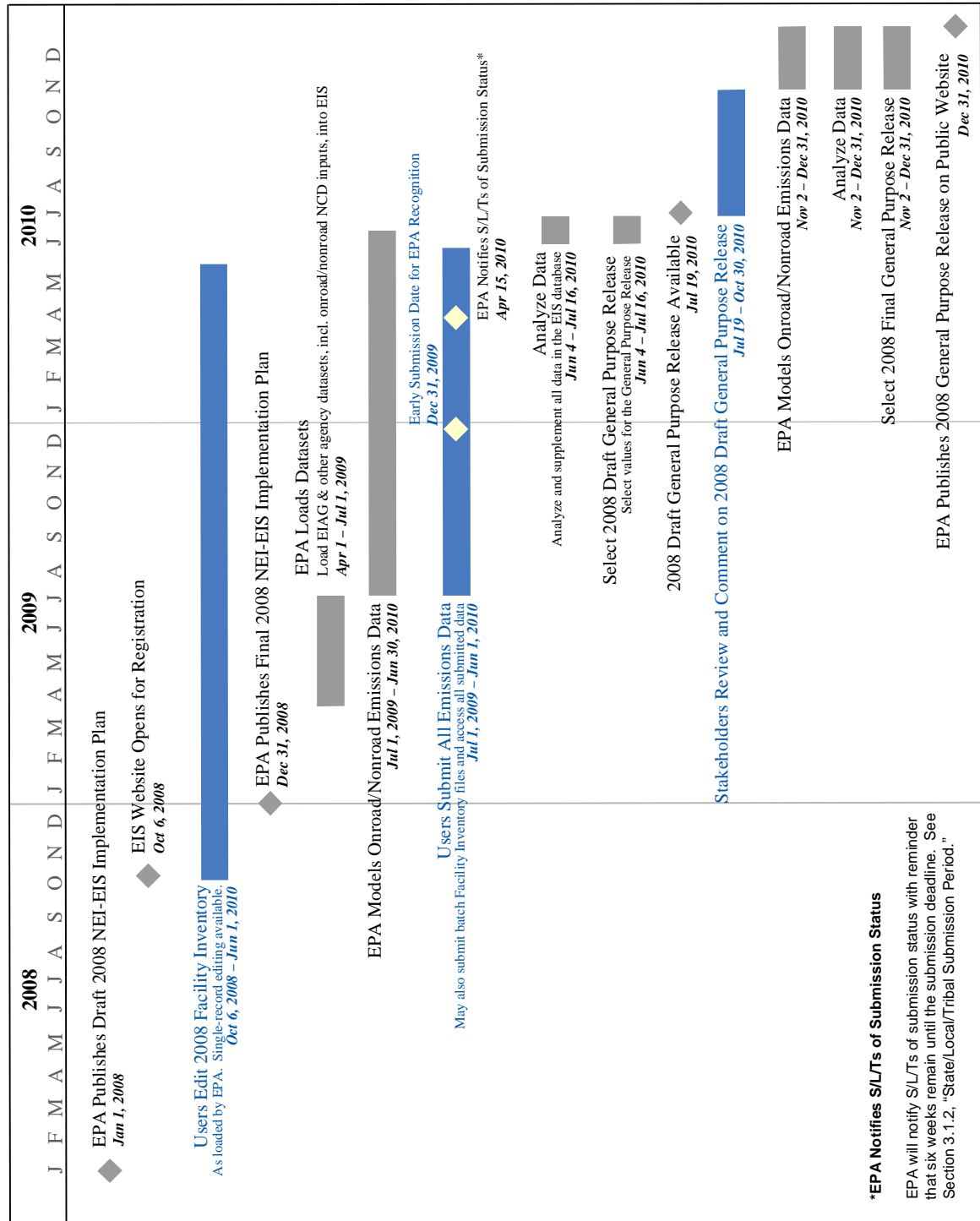
- Pre-Submission: *January 1, 2008 - June 30, 2009*
- State/Local/Tribe Submission: *July 1, 2009 - June 1, 2010*
- Post-Submission: *June 2, 2010 - December 30, 2010*
- Post-Publication: *Beginning December 31, 2010*

Figure 1-1
2008 NEI Timeline Periods

2008	2009	2010	2011
J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J A S O N D	J F M A M J J
Pre-Submission <i>January 1, 2008 - June 30, 2009</i>			
	Submission <i>July 1, 2009 - June 1, 2010</i>		
		Post-Submission <i>June 2, 2010 - December 30, 2010</i>	
			Post-Publication <i>Begins December 31, 2010</i>

Figure 1-2 presents a more detailed timeline, with major milestones for each of the above periods, and is followed by a description of each event in the timeline.

Figure 1-2
Schedule for Submission of Emissions Data for 2008 NEI



1.6.2 Pre-Submission Period

- **EPA Publishes Draft 2008 NEI/EIS Implementation Plan**

January 1, 2008

EPA will publish a draft plan for building the 2008 NEI. The plan will include the process for building the 2008 NEI, new and/or modified quality assurance checks and analysis, current reporting codes, and new reporting formats. Providing this information prior to the start of the submission period will allow submitters time to adjust their information systems and internal quality assurance to ensure that the correct data elements are gathered and submitted.

- **EIS Gateway Opens for Registration**

October 6, 2008

S/L/Ts will register to use the EIS Gateway, where they will have access to their facility inventory data, reports, and data retrievals. EPA issues user IDs and passwords to those registering to use the EIS Gateway.

- **Users Edit EPA-Loaded 2008 Facility Inventory**

October 6, 2008 - June 1, 2010

EPA and S/L/Ts will review and update existing facility inventory, which will be available through the EIS Gateway.

Users will be able to update their facility inventory in advance of the submission period. Users may edit individual records through the EIS Gateway to add facility sites or to change information for existing facility sites in their jurisdiction.

During the submission period, which opens July 1, 2009, users may submit through EPA's Central Data Exchange (CDX) node a complete facility inventory or a batch of changes to their facility inventory.

The EIS facility inventory process allows tracking and submission of facility information for point sources for each inventory cycle or year. Each facility site will be identified from cycle-to-cycle with a permanent and unique EIS identifier. Crosswalk functionality will relate this EIS facility site identifier to other identifiers, including one or more S/L/T identifiers, the FRS IDs, ORIS codes, and/or TRI IDs. These alternate identifiers will support relationships for specific time periods, so that a change in an alternative identifier can occur and still provide accurate linkages over time.

S/L/Ts are expected to maintain their facility inventory, either through batch submissions or online data entry, through the EIS Gateway. EPA has developed the EIS QA Environment to assist submitters in identifying issues with their data prior to submitting to the EIS Production Environment. Quality assuring a data file prior to official submission will identify facility inventory problems if emissions data are submitted which do not align with facilities in the inventory.

There is no submission window for facility inventory data as there is with emissions data, although certain changes in a facility's operating status are dependent on emissions submissions. For example, an operating status cannot be changed to inactive if emissions have been submitted for the period. S/L/Ts are encouraged to maintain facility inventory

information on a regular basis in order to minimize the burden of updating large numbers of facilities just prior to reporting point emissions.

Through the EIS Gateway, users will be able to run reports and download their facility inventory data to assist in the maintenance of these data.

- **EPA Publishes Final 2008 NEI/EIS Implementation Plan**

December 31, 2008

EPA will publish the final reporting instructions for the 2008 inventory year. In addition, final versions of other sections and appendices of the NEIP will be provided with the reporting instruction sections. Additional sections and appendices will be added to the NEIP subsequent to December 31, 2008.

- **EPA Loads Datasets**

April 1 - July 1, 2009

Before the start of the submission period, EPA will load select datasets into the EIS in order to provide S/L/T submitters with information to help them generate and quality assure their emissions inventories, and to populate the EIS with information needed to generate the NEI. At a minimum, the following datasets will be loaded into the EIS:

- CAMD facility, unit, SO₂, and NO_x data;
- TRI facility data;
- Onroad and nonroad emissions generated from the National Mobile Inventory Model (NMIM);
- Activity inputs from the NMIM County Database; and
- Nonpoint emissions for certain sectors.

See Section 1.9 and 1.10 for specific details on the datasets that EPA will collect during this period.

1.6.3 State/Local/Tribe Submission Period

- **EPA Models Onroad/Nonroad Emissions**

July 1, 2009 - June 30, 2010

During this period, EPA will use the activity input data submitted by S/L/Ts to model onroad/nonroad emissions. On the first of each month, NMIM County Database files are to be created by the EIS from the activity inputs submitted by S/L/Ts during the previous month. These files are sent to U.S. EPA's Office of Transportation and Air Quality (OTAQ), which runs the NMIM model and generates emissions. The calculated emissions data are to be sent back to the EIS and loaded into the database. Submitters will then have access to view their calculated emissions data through the EIS Gateway, but will not be able to change the emissions. They will be able to submit new activity inputs so that emissions can be once again calculated.

- **Users Submit All Emissions Data**

July 1, 2009 - June 1, 2010

During this period, S/L/Ts will submit their facility inventory and point, nonpoint, onroad/nonroad, and event emissions data through the CDX node to the EIS. Although the regulatory submission period begins on January 1, 2009, submission access to the EIS will not open until July 1, 2009. On that date, EPA will open submission access to the EIS for registered users. Submitters will also be able to update their facility inventory during this period, either in batch format or through the EIS Gateway.

An S/L/T "official submission" consists of all the emissions-related data in the EIS when the submission window for the inventory cycle closes on June 1, 2010. This includes data submitted in an XML batch file through the CDX node, as well as the data provided through the EIS Gateway. Until the submission window closes, S/L/Ts will be able to continually update their data in the EIS without notifying EPA.

Prior to making a Production submission, S/L/Ts are strongly encouraged to quality assure their facility inventory and emissions data by making a submission to the EIS QA Environment. See Section 1.11.10 for more details.

Data that meet basic format and content requirements will be loaded directly into the EIS database. Data that do not meet the requirements will be rejected. S/L/Ts will receive or have access to an invalid file report and a feedback report about their submission within one business day of submission.

Users will be able to view and edit their data through the EIS Gateway once they have been loaded into the EIS. All users will be able to retrieve and download their data in tabular format and to query data through a variety of reports available online. Users will be able to view all data within their reporting jurisdiction, but will not be able to access any data outside their reporting jurisdiction. After the close of the submission period, the next opportunity S/L/Ts will have to review their data will be during the draft General Purpose Release review period.

For more information on updating the facility inventory, see Section 6, "Reporting Instructions for the EIS Facility Inventory."

EPA will close submission access to the EIS on June 1, 2010. Data will not be accepted by the EIS once submission access is closed.

- **Early Submission Date for EPA Recognition**

December 31, 2009

S/L/Ts that have completed their 2008 NEI data submission by this date will receive high-level recognition by EPA.

- **Recommended Last Date to Begin Submitting Data**

April 15, 2010

EPA recommends that S/L/Ts start submitting their data no later than the above date, which is six weeks before the close of the submission window. EPA will notify S/L/Ts of their submission status and remind them that the submission period is nearing its end.

Please note that the timeline reflects an important change in the submission procedure. As referenced above and described more fully in Section 1.11.11, quality assurance is now automated by the EIS. Data that do not pass QA checks may be rejected. Submitters are strongly encouraged to quality-assure their data in the EIS QA Environment prior to submitting the data to the EIS Production Environment.

Quality assurance in prior inventory cycles was performed **after** the close of the submission period. Because the EIS will run QA checks immediately with every submission, QA will now occur **before** the official submission. Thus **submitters must allow sufficient time before the submission deadline to update their data to incorporate EIS QA feedback. Submitters should not wait until the end of the submission period to make their submission.**

1.6.4 Post-Submission Period

Once submission access is closed on June 1, 2010, all submitted data in the EIS, including facility inventory data, will continue to be viewable, but will no longer be accessible for updates.

- **Inventory Analysis**

June 4 - July 16, 2010

The analysis of the emissions inventory data will begin as soon as submission access to the EIS is closed. EPA will identify any data missing from the inventory and will begin a more detailed analysis of the submitted data. For example, EPA may generate a list of the warning messages that were not resolved for each submission, compare the emissions data of the current cycle to that of the previous, and review specific sectors of data on a national basis to check for consistency. EPA will provide feedback on the results of the analysis. No data will be rejected during the analysis period. However, S/L/Ts may be encouraged to make a resubmission to address an issue discovered during the analysis.

- **Inventory Selection**

June 4 - July 16, 2010

During the inventory analysis period, data will also be selected for inclusion in the 2008 General Purpose Release. Although the NEI comprises multiple emission values, the General Purpose Release of the NEI will contain a single emission value for each pollutant for a given source. The General Purpose Release will be developed by EPA based on data selected to represent a set of emission values most appropriate for use by the general public. These data will contain a limited metadata set, so that users can identify the source of any merged or augmented data, along with any references, caveats, or citations.

EPA will select S/L/T data, where possible, for the General Purpose Release.

- **EPA Completes Draft 2008 General Purpose Release**

July 19, 2010

EPA will release the draft 2008 General Purpose Release for S/L/T review after having completed the selection process. The draft General Purpose Release will not be release to the public.

- **Stakeholder Review and Comment on Draft 2008 General Purpose Release**

July 19 - October 30, 2010

S/L/Ts will have 15 weeks to review and comment on all data that are in the NEI and that have been selected for inclusion in the 2008 General Purpose Release within their jurisdiction. The EIS will reopen during this period so that S/L/Ts may submit batch files to update their own data with any corrections or make corrections through the EIS Gateway. Although S/L/Ts will be able to resubmit a complete emissions inventory, they are strongly encouraged to resubmit only changes to their previously submitted data. Some, all, or none of these resubmitted data may be included in the General Purpose Release, at the discretion of EPA.

Based on their user rights, EPA users will have access to the draft 2008 NEI for further analysis of the data. The data will include the source of inventory data selected and any comments include with the data.

- **EPA Models Onroad/Nonroad Emissions**

November 2 - December 31, 2010

As needed, EPA will rerun the NMIM model based on any updates to the activity input data during this period, and will incorporate the data into the 2008 General Purpose Release.

- **Inventory Analysis**

November 2 - December 31, 2010

EPA will again perform analysis of the emissions inventory data to determine the extent of the changes made during the S/L/T review and comment period.

- **Inventory Selection**

November 2 - December 31, 2010

Based on the inventory analysis, EPA will select the data to be included in the 2008 General Purpose Release.

1.6.5 Post-publication Period

- **EPA Publishes General Purpose Release**

December 31, 2010

EPA will publish the 2008 General Purpose Release by the above date on a public Internet website. The General Purpose Release will provide users access to a variety of data associated with the NEI through reports, queries, and downloads.

There may be further EPA updates, as well as opportunities for S/L/Ts to modify their data after the 2008 General Purpose Release is published.

1.7 Who Should Report Emissions to the NEI?

The CERR requires air pollution control agencies in the 50 States, the District of Columbia, and territories to report emissions inventory data. Although the CERR does not require Tribal agencies to submit their emissions inventory data, they are strongly encouraged to do so. Those submitting emissions inventory data according to the reporting instructions are referred to as S/L/Ts throughout the 2008 NEI-EIS Implementation Plan.

1.8 What Pollutants Are Included in the NEI?

The 2008 NEI will include emissions estimates for the following air pollutants:

- **Criteria Air Pollutants.** The CERR requires the reporting of those pollutants defined as criteria air pollutants (CAPs) and their precursors. EPA completes a CAPs inventory in the NEI.
- **Hazardous Air Pollutants.** S/L/Ts are strongly encouraged, but not required, to report those pollutants defined as hazardous air pollutants (HAPs). These data are needed to support programs enumerated in Sections 112(d), 112(f), 112(m), 112(n), 112(c)(6), and 129 of the Clean Air Act. EPA completes a HAPs inventory in the NEI, and will supplement data for emissions not reported by the S/L/Ts.
- **Greenhouse Gases.** The CERR does not require that the NEI include greenhouse gases (GHGs). For the first time, however, S/L/Ts have the option to report GHGs to the NEI. The 2008 NEI pollutant code list can be found in Appendix 7, "EIS Code Tables." Further detail on pollutant specifications and reporting appears in subsequent sections.

1.9 Which Pollution Sources are Included in the NEI?

The CERR defines the pollution sources for which emissions will be inventoried and sets emissions reporting thresholds for S/L/Ts. These sources are grouped into data categories that share similar reporting specifications. For each data category, EPA has established the list of specific emissions processes for which S/L/Ts should report emissions. These process lists can be found in Appendix 7, "EIS Code Tables," by Source Classification Code (SCC).

The data categories are:

- **Facility Inventory.** The permanent, continually maintained inventory of large stationary sources, and voluntarily-reported smaller sources, that serves as the basis for all **point** emissions (see below). It contains information about facility sites and their location and operation, emissions units, emissions processes, release points, controls, and applicable regulations. To establish the facility inventory in EIS, EPA used the facility inventory data submitted for the 2002 and 2005 inventory cycles, as well as other sources of facility inventory data. S/L/Ts are responsible for updating this information, as necessary, prior to submitting emissions data. For more information, see Section 6, "Reporting Instructions for Facility Inventory."
- **Point.** Point sources are those emission sites that are individually identified, estimated, and reported, as opposed to those sources that are estimated and reported as an aggregate, typically at a county level. The CERR specifies that sources emitting criteria pollutants in amounts greater than certain thresholds must be reported as point sources. However,

S/L/Ts are encouraged to also report smaller emitters as point sources if they have such data. All reported point emissions must have a facility site stored in the EIS Facility Inventory (see above). For more information, see Section 7, "Reporting Instructions for Point Emissions."

- **Nonpoint.** Nonpoint sources are aggregates of smaller, stationary sources, typically reported at the county level. Nonpoint sources are not included in the facility inventory. For more information, see Section 8, "Reporting Instructions for Nonpoint Emissions."
- **Onroad and nonroad.** Onroad, or highway, sources include vehicles used on roads for transportation of passengers or freight. Nonroad sources include vehicles, engines, and equipment used off highways for construction, agriculture, transportation, recreation, and many other purposes. These sources are generally estimated and reported at the county level. Along with other sources, they were previously referred to as mobile sources. For more information, see Section 9, "Reporting Instructions for Onroad and Nonroad Activity Data," and Section 10, "Reporting Instructions for Onroad and Nonroad Emissions."
- **Events.** Events are unexpected activities resulting in significant, reportable air emissions. For the 2008 emissions inventory cycle, events include wildfires, controlled burns, wildland and agricultural burns. In the future, the event category will be used to report emissions associated with natural disasters. Events were reported as either point or nonpoint sources in previous inventory cycles. The EIS now provides a more flexible and robust reporting approach designed specifically for events. For more information, see Section 11, "Reporting Instructions for Event Emissions."
- **Biogenic.** Biogenic sources are those that are naturally occurring. Beginning with the 2008 NEI, EPA will calculate all biogenic emissions and will no longer accept submissions from S/L/Ts.
- **Reporting instructions for Airports, Locomotives, and Commercial Marine Vessels.** The reporting requirements for these three sectors have changed significantly from previous inventory cycles. Consequently, a separate set of reporting instructions is needed to highlight the changes. See Section 12, "Reporting Instructions for Airports, Locomotives, and Commercial Marine Vessels."

1.10 In what Format Should Data Be Reported?

The CERR requires electronic reporting and provides discretion to EPA in establishing formats and methods. EPA has determined that for the 2008 inventory cycle, all data must be reported using Extensible Markup Language (XML) documents. The 2008 NEI/EIS Implementation Plan includes information, references, and other resources to assist S/L/Ts with this transition.

For more information, see the above reporting instructions sections, Section 2 "Transitioning from NIF 3.0 to the 2008 NEI", and Section 5, "Submitting XML Data to the EIS."

1.11 How are NEI Processes Communicated?

Effective communication of resources, standards, and processes to all stakeholders is key to ensuring the submission of high quality data. EPA will publish the final implementation plan for the current inventory cycle no later than six months prior to the start of the submission period. The following section identifies the types of information and materials which will be available to S/L/Ts through the EIS Gateway. Providing this information prior to the start of the submission period will allow S/L/Ts time to adjust their information systems and internal quality assurance procedures to ensure that the correct data elements are gathered.

1.11.1 Reporting Instructions

Reporting instructions for all categories of data are provided in subsequent sections of the implementation plan. These sections will contain a complete list of all new and/or modified quality assurance checks, new reporting codes, and full descriptions of how the EIS will process the submitted data. The instructions will improve the transparency of the process and allow data providers to understand the business rules behind the process and the checks to which their data will be subjected. Reporting instructions for all data categories are provided in Sections 5 through 12, which explain how the EIS will process submitted data. All reporting codes used by the EIS are provided through the EIS Gateway and in Appendix 7, "EIS Code Tables." Other sections and appendices provide additional resources.

With publication of the business rules and checks, the EIS and its documentation will improve the transparency of the NEI process.

1.11.2 XML Schemas and Data Dictionaries

Complete XML schemas, examples, and data dictionaries have been provided for all categories of data. Data types, validation codes, limits, patterns, and ranges have been provided as early as possible to allow data submitters adequate time to adjust their own systems and schemas to accommodate changes from previous inventory processes.

For more information, see Section 5, "Submitting XML Data to the EIS," and Appendix 2, "CERS and Examples."

1.11.3 Protected Data

The EIS, with S/L/T approval, will "protect" from modification certain facility inventory data that have been previously quality-assured by EPA at a high level. These may include facility addresses, geographic coordinates, stack parameters, design capacity, applicable regulations, and control approaches.

Users may use EIS Ticketing Management to request a change to the protected status of selected data.

1.11.4 Submittal Tracking

Submissions to the QA Environment are not tracked. The data are only stored long enough for feedback to be generated, at which point the data are removed from EIS. The XML

file is stored for five business days in order to provide assistance to the data submitter as necessary. The XML files are removed from the system at the end of five business days.

All submissions to the Production Environment are tracked through status tracking logs. In addition, all changes to data are tracked in log tables. Examples include attributes about the changed data such as references to the new data source, the identity of the user who adjusted the data, and the time of the change. These logs are available for review on the EIS Gateway as part of the transparency of the EIS. The submission tracking process assists in the communication between S/L/Ts and EPA users during the various stages of the EIS process.

1.11.5 Feedback to Data Submitters on Submission Status

The EIS will provide the submitter a notification of the status of the submission at the completion of each submission.

1.11.6 Managing and Publishing Codes

The EIS stores a variety of code sets that are used to validate data. Incorrect use of reporting codes may cause data to be rejected. All code sets are published and easy-to-use tools are provided through the EIS Gateway for users to find information to reduce the number of errors involving invalid codes.

Several code types cannot be maintained by EPA's emissions inventory developers. Examples include verification method codes, State and County FIPS codes, and NAICS codes. However, EPA is still responsible for providing a list of valid codes as a service to data submitters. EPA will establish a process to check on a regular basis for updates to codes maintained by other agencies, including dates on which a code has been updated and the data source from which it was acquired. Important codes to the EIS for which users may request updates or suggest additions to the inventory include source classification codes, pollutant codes, and unit of measure codes. Updates to these codes will require review and additional documentation. Version control of these codes will minimize code management problems. Data submitters will be required to use codes that are valid for a specific inventory year.

Submitters have often used old codes and tried in error to submit them in their inventories. Users will be able to find retired codes with references to the correct current code. The data submitter should use the EIS Gateway to search all valid codes and be able to examine retired codes to see if the code they need already exists. If existing codes do not meet a submitter's needs, the submitter may submit a support request through the EIS Gateway requesting a new code. The process for approving new codes depends on the type of code requested, although procedures to review, approve, or deny codes will be established for all codes. Where a requested code is disapproved, an alternative code or solution will be recommended.

The full set of code tables will be updated on a quarterly basis. There will be a rolling deadline for code requests to be included in the next update to allow EPA adequate time to process and complete any supplemental information, such as speciation and Tier assignments. The most critical deadline will be the period prior to the submission deadline, as the codes must be in the system and considered valid prior to the submission period using those codes.

1.11.7 Publishing Emission Factors and Calculation Methods

Emission factors will be published for reference purposes only and to assist the data submitter with information on the emissions calculation process. The EIS Gateway will provide tables of emission factors used to calculate emissions for pollutants from activity, as well as input data for each category. Users are not required to use particular factors, but they will be aware of the expected pollutants and the factors that EPA will use to calculate them should users not provide emission factors with their submissions. Users will also be able to request that emission factors and calculation methodologies for specific pollutants be added to the tables. In these cases, the data, along with supporting documentation, will be available to all users.

Providing resources for some emissions calculations can be complicated. For example, estimating emissions from livestock manure management or from mobile sources requires complex calculations, and models already exist for many of these types of sources. The EIS will not provide these models but instead will provide information on where they can be found and how they can be used. S/L/T and EPA users are encouraged to use the same models so that data are calculated using consistent methods.

1.11.8 Inventory Preparation Resources

Resources will be available to assist submitters in preparing their inventory data. The following is a preliminary, non-inclusive list of resources that the EIS Gateway will provide to submitters:

- Emission factors, fuel usage, population, and distribution factors used for nonpoint calculations.
- Acceptable emissions range checks for each pollutant.

Additional analysis tools will be available to EPA users as part of the process to manage the development and analysis of the inventory. The following is a preliminary, non-inclusive list of tools:

- Comparison of two pollutants for an emissions sector.
- Comparison of current and previous inventories for emissions sectors.
- Comparison of reported pollutants and emissions sectors and their emissions amounts across States.
- Comparison of alternate emissions datasets, such as EPA-generated versus S/L/T submitted data, to identify missing sources or possible double-counting of emissions between point and nonpoint data categories.

1.11.9 Public Information at the NEI Public Website

The NEI public website will provide users access to a variety of data associated with the NEI through reports, queries, and downloads of the General Purpose Release described above. The data on this website will be limited to facility data and final selected emissions data, and will not contain multiple alternative versions of emissions data. These data will contain a limited set of the metadata information so that users can identify the data source or any merged or

supplemented data, along with any references, caveats, or citations. The NEI public website will indicate the version and date of the last inventory and will offer industry sources the opportunity to review data.

1.11.10 EIS Quality Assurance Submissions

S/L/Ts are strongly encouraged to check their batch facility inventory and emissions data in the EIS QA Environment prior to submission. The QA Environment will perform the same quality checks as those run on the submissions to the EIS Production Environment. Automated feedback is provided to the user on data quality and, where possible, recommended corrective measures. Transactions in the QA Environment are not tracked and do not constitute an official submission as required by the CERR. Data are only stored long enough for the feedback report to be generated, and the submitted XML file is archived for five business days. During this period, EPA may access the archived XML file and the feedback report to provide assistance, but only if the submitter specifically requests that they do so.

After users make necessary edits to the data in their local system, they can resubmit a dataset an unlimited number of times using this process. When users consider the data in final format, they will make a submission to the EIS Production Environment. The data cannot be promoted to the Production Environment from the QA Environment; this must be a separate submission. At the end of the submission period (June 1, 2010), all the emissions data in EIS for an S/L/T Agency will be considered the official submission.

1.11.11 QA Checks

The goal of the QA process is to check the data throughout the submission process and to improve the quality of data in the EIS. Data validation will occur at multiple points in the process rather than just a single point. All checks are run from a centralized location on the EIS servers using a single consistent set of checks. The Basic Format Content Checker and Schematron are no longer used to perform quality assurance and data validation. The following sections identify processes and strategies that are used in the new system to provide QA checks and data validation on the content of the inventory. These analyses may occur during the submission period, as part of the file submission QA check, or during the post-submission period when the entire inventory is under development.

- **QA Benefits**

Through the enhanced QA process, the EIS will produce the following benefits:

- **Improvement in data quality.** The EIS will improve data quality by establishing standards and providing feedback throughout the process.
- **Consistency of standards.** A specific set of QA checks and activities will apply to every submission, creating greater consistency across reporting jurisdictions and greater comparability with future NEIs.
- **Automation efficiencies.** The EIS will run a consistent set of QA checks against all the data. This will reduce the errors generated through manual intervention and manipulation.

- **Quality Assurance Objectives and Principles**

The EIS is guided by the following QA objectives and principles:

- **Automation of quality assurance.** All QA checks performed on submitted data are fully automated.
- **Quality reviewed throughout the EIS process.** Data are reviewed for quality and feedback is provided to submitters throughout the submission and post-submission processes. By applying checks at multiple steps throughout the submission process, the EIS verifies that submissions are complete, that items are on accepted code lists, and that emission and activity values are within range. During the process to build the inventory, the EIS verifies that emissions are not double-counted.
- **Transparency of quality standards, checks, and assessments.** All specifications for QA checks applied by the EIS are made available prior to the opening of the submission period. This ensures complete transparency to users and submitters. Errors will be made known to users as the data are processed. Feedback will be provided in a timely fashion. Checks are to be numbered and well-documented so that users understand clearly what the error is and why it happened.

- **QA of Facility Inventory**

Checks are run on the facility inventory during the pre-submission time period. Facility sites from the 2002 and 2005 NEIs were loaded into the EIS for S/L/Ts to review. Users are encouraged to review and update this inventory on the EIS Gateway prior to the submission period to ensure an accurate facility inventory. Users should examine the pre-loaded facility inventory data for their jurisdictions, make corrections and additions as needed, and adopt EIS facility, emissions unit, and process identifiers. If EPA added facility sites to support non-S/L/T data from other EPA data sources such as the TRI, these facility sites will be labeled as such.

Reports will be available to allow submitters to review their data in a variety of different views. Users can also download facility inventory data from the EIS Gateway.

Modifications or additions made online also trigger QA checks. High quality facility inventory will avoid duplicate entry of facility sites and reduce the likelihood of submitting emissions data for missing facility sites during the submission of emissions.

- **QA of Emissions**

Checks for emissions data include whether emissions are within expected ranges, whether expected activity data have been reported, and whether the expected pollutants for SCCs have been reported. In addition, if activity data are provided, emissions are calculated and checked against submitted emissions.

- **Other EPA Data**

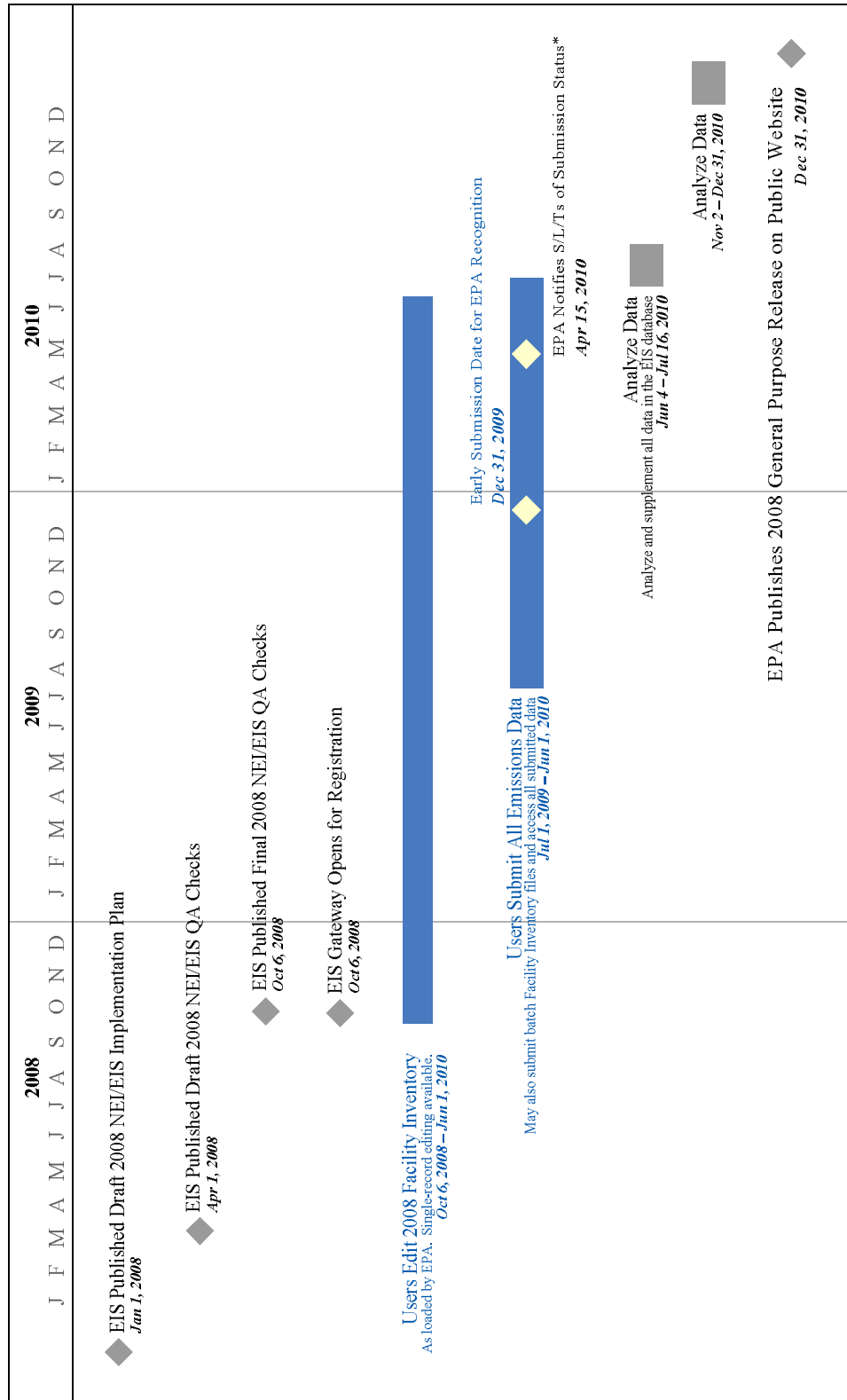
Other EPA data, such as TRI and CAMD data, may be used for validation in certain cases, including to determine incomplete reporting of inventory, or to compare reported emissions. TRI data may be used to identify facility inventory data and pollutants that are missing from an S/L/T submission. CAMD data, or emissions data reported by

sources affected by the Acid Rain Program or other emissions trading programs, may be used by the EIS to quality assure SO₂ and NO_x emissions data submitted by S/L/Ts. Future inventories may include data that become available in CAMD's system. These data may also be used, where appropriate, to supplement S/L/T data.

- **QA Timeline**

Figure 1-3 presents the key milestones and time phases in which S/L/T users have access to QA check information and when the QA check process occurs during the submission process. A full description of the complete submission timeline follows.

Figure 1-3
Major QA Milestones and Timeline for 2008 NEI



- **EPA Publishes Draft 2008 NEI/EIS Implementation Plan**
January 1, 2008

EPA will publish a draft plan for building the 2008 NEI. The plan will include the process for building the 2008 NEI, the methods and references to activity information that EPA will use to calculate emissions data where no data are submitted, new and/or modified quality assurance checks and analysis, current reporting codes, new reporting formats, and updates to emissions inventory tools. Providing this information prior to the start of the submission period will allow submitters time to adjust their information systems and internal quality assurance to ensure that the correct data elements are gathered and submitted.

- **EPA Publishes Draft 2008 NEI/EIS QA Checks**
April 1, 2008

EPA will publish a draft of the QA checks for all data categories, as well as for all other file submission checks. All checks will have a modification history date field, which will enable users to track checks that have been modified since the April 1, 2008 release.

- **EPA Publishes Final 2008 NEI/EIS QA Checks**
October 6, 2008

EPA releases final QA checks, including both submission and analysis checks.

- **EIS Gateway Opens for Registration**
October 6, 2008

S/L/Ts register to use EPA resources for EIS purposes. EPA issues EIS Accounts.

- **Users Edit 2008 Facility Inventory -- Single-Record Editing Available**
October 6, 2008 - June 1, 2010

S/L/Ts access Facility Inventory online to modify and add facility sites. QA checks are run on any changes made to facility sites. Results of QA checks are provided to users. S/L/Ts are encouraged to download facility inventory and EIS identifiers to include in their local systems for facility reporting.

- **Users Submit All Emissions Data**
June 1, 2009 - June 1, 2010 and July 13, 2010 - November 1, 2010

During these periods, S/L/Ts will submit their data through the CDX node to the EIS. S/L/Ts can check the contents of their XML documents through a submission to the QA Environment and receive a feedback report on the results. Users then submit quality-assured data to the EIS by making a Production submission. S/L/Ts receive or have access to a feedback report regarding their submission within one business day.

- **EPA Analyzes Inventory**

June 4, 2010 - July 16, 2010 and November 2, 2010 - December 31, 2010

During these periods, EPA has access to all submitted data and runs additional analysis checks to identify outliers and other anomalies. EPA will communicate with S/L/Ts where additional data are expected to be reported to fill gaps using calculated data. After resubmission, further analysis checks are run before the General Purpose Release is prepared for publication.

- **Overview of Submission Checks**

The following are some of the types of checks the EIS will perform on all submissions:

- **Required data elements.** The EIS will perform an initial check to verify that all required data elements are present.
- **Facility inventory identifiers.** For point emissions data reported, the EIS will check that the facility inventory identifiers submitted by the S/L/T match an existing facility site in the inventory.
- **Duplicate facility inventory data.** The EIS will check for potentially duplicative facility site data, requesting further information from the user on questionable data, and automatically alerting an EPA analyst. The analyst may accept the data or contact the user to determine the appropriate action. See Section 6.3.5, "Logic for Identifying Duplicate Facility Sites" for more information on the specific data elements checked.
- **Expected and unallowed pollutant codes.** The EIS will check that the correct pollutant codes and SCCs are reported, and will also determine whether unexpected pollutants were reported.
- **Geographical areas.** The EIS will check that geographical codes such as FIPS codes are valid for which the submitter is responsible.
- **Check of spatial data.** Checks will confirm that shape IDs reference active shape files and that latitude/longitude coordinates fall within the correct FIPS census, or Tribal area.

- **EIS QA Checks**

Appendix 5, "QA Checks" contains the list of QA checks that will be applied to all submitted data, either through the EIS Gateway or through a batch submission of data in XML format, and includes the following information for each check:

- **Name.** Brief descriptive name for each check.
- **Number.** Number to facilitate easy referencing of check results.
- **Description.** Full description of the check and the applicable rules for the check.
- **Level of criticality.** Seriousness of any issue identified by a check and the type of action resulting.

- **Data category.** Category(ies) to which check applies.
- **Type.** Types of checks include:
 - **Range.** Verifies that data fall within a prescribed minimum and maximum value. To determine what these values are for a specific check, see the check parameter information in Appendix 5, "QA Checks."
 - **Calculation.** Activity data provided are calculated and checked against submitted emissions.
 - **Comparison.** Data reported are compared either to data previously reported for the same geographic location and SCC in a previous inventory year or to other EPA data sources.
 - **Format.** Verifies whether contents of the attached files or the data element contained in the submission are in the expected format, and includes a check for invalid field lengths.
 - **Authorization.** User of the EIS Account submitting the file is checked for permission to submit data for the geographic areas reported.
 - **Present.** Verifies for the given data category that required data elements beyond the global checks are present.
 - **Code.** Code reported must match a value in a code list.
 - **Cardinality.** Checks for the existence of the minimum or maximum number of allowable data elements that can be reported in a file submission.
 - **Conditional.** Checks that data are present if a certain condition exists. For example, at least one boiler must be reported for an electric generation plant.
- **Parameters.** A check may have one or more parameters depending upon its type. These parameters are checked for expected values or results, such as the minimum and maximum values for a range of checks on emissions values or stack heights.
- **Time period.** Indicates whether the check is performed during the submission process or during analysis. A check can occur during more than one period.
- **Feedback message.** Actual message that would be contained in the feedback report.
- **Technical notes.** Notes that display formula or specifications on how the check will be implemented.
- **Modification history.** As checks are updated, or inactivated, modifications are tracked and contained in a brief description of the changes made, including dates of new checks and modifications to existing checks.
- **Notifications Resulting from QA Checks**

The QA check process will generate a feedback report containing each issue identified. Upon completion of the check process, the EIS will send a notification to the submitter

and other users responsible for the reporting Agency that the feedback reports are available for viewing or downloading from the EIS Gateway.

- **Check Level Criticality**

One of three levels of criticality will be assigned to each check, indicating the type of response required.

- **Informational.** Submitted data are acceptable as provided. Additional information about the checked data will be made available.
- **Warning.** Submitted data are accepted but warrant further investigation and review by an EPA analyst. A warning notification details potential errors. Checks in this level may upgrade to critical in a later inventory cycle.
- **Critical.** Any data element that fails a critical check is rejected. If a rejected data element is required for a component, the entire component is rejected. The notification details errors and suggests corrective actions.

- **Modifying Checks**

If a check is found to be producing inaccurate results, authorized EPA staff, with some restrictions, can disable or modify QA checks and associated error messages at any time during an inventory cycle. EPA will not temporarily disable critical checks to allow the submission of data with critical errors in order to meet a submission deadline.

During the submission period, EPA will only modify QA checks to be less restrictive or to be a lower critical level. A QA check will never become more stringent during the submission period for an inventory cycle.

S/L/Ts are strongly encouraged to test their batch facility inventory and emissions data by making a submission to the QA Environment prior to making a Production submission so as to resolve any critical data issues and decrease the processing time for submitted data.

Users can request clarification or suggest modifications to QA checks, and will receive a response to comments or requests within three business days. Checks will not be modified unless EPA determines that the check itself, rather than the data, is in error. QA checks that can be modified quickly will be expedited; however, more complex QA check modifications may require scheduling with the next software release.

- **Data Rejection**

Incomplete data or critical errors may prevent acceptance of data. EPA will try to reject data at the smallest possible increment, such as at the SCC or control approach level. The following levels of data that will be rejected when a critical error is encountered are presented in order from the largest to the smallest increment.

- **File submission.** If file structure or systemic errors within the file prevent processing, the entire submission may be rejected. See Section 5, "Submitting XML Data to the EIS" for further information on XML document errors.

- **Onroad/Nonroad activity data.** If the attached activity files for reporting Onroad/Nonroad data contain **any** critical errors, the entire file submission will be rejected. See Section 9, "Reporting Instructions for Onroad and Nonroad Activity."
- **Location.** If a reporting jurisdiction uses County, State, or Tribal codes that do not match a value in the code list or are inconsistent, that is, the location is not within the submitter's Agency permission or the location data conflict or are unrecognized, all location data and their dependent data will be rejected. This includes any emissions reported for this location.
- **Facility site.** If data elements required for the duplicate facility site check process (postal code, City, State, Tribal code, latitude/longitude) are not provided, the entire facility site will be rejected.
- **Emissions unit.** If no EIS or S/L/T identifiers are provided for an emissions unit, then all processes and associated emissions will be rejected.
- **Process.** If the SCC is not provided or does not match a valid code in the SCC list, then the process and all reported emissions will be rejected.
- **Control approach.** If the required minimum of one control pollutant and one control measure are not reported for a control approach, the entire control approach will be rejected.
- **Release point and release point apportionment.** If one or more of the required data elements for a release point are not provided, the release point will be rejected, and any apportionment data also will be rejected. If the percent apportionment for a single process to multiple release points does not equal 100%, then the release point apportionment will be rejected.
- **Emissions.** If the reporting period identified does not match a code in the list, all activity data and emissions will be rejected. If the activity data reported with the emissions data have critical errors, only the activity data will be rejected. If the emissions reported do not have a valid pollutant code, only the emissions for that pollutant will be rejected.

- **Communication from Users**

Submitters may choose to provide supplementary information in the form of text relating to their submission. These comments will be stored in the EIS along with the submitted data.

- **Assessing Trends in Quality over Time**

It is EPA's goal to improve the quality of the data for each successive inventory cycle. EPA will define and the EIS will generate metrics that will allow tracking trends in data quality over time.

1.12 What Are the Processes for Specific Data Categories?

1.12.1 Point and Nonpoint

The process for point and nonpoint emissions will follow the steps outlined in Section 1.6.1. The exception is the submittal of annual major point source emissions inventories. Annual data submissions will be stored in the EIS database after initial quality assurance checks have been run.

For more information on submitting point and nonpoint data, see Section 7, "Reporting Instructions for Point Emissions" and Section 8, "Reporting Instructions for Nonpoint Emissions."

1.12.2 Onroad and Nonroad

Although S/L/Ts are required to provide EPA with an inventory of onroad and nonroad emissions, State and Local Agencies are encouraged either to provide activity data instead or to provide both emissions and activity data.

Figure 1-2 includes several dates specific to onroad/nonroad data that are discussed below.

- **EPA Models Onroad/Nonroad Emissions**

July 1, 2009 - June 30, 2010

EPA uses activity input data submitted by S/L/Ts and the activity input data in the NMIM County Database for those S/L/Ts that did not submit calculated emissions. The submitted activity inputs and the resulting emissions are loaded into the EIS database. This process is repeated as necessary at the end of the S/L/T review and comment period.

All submitted NMIM county database files and emissions data files will be loaded into the EIS. These data will be available for review and download through the EIS Gateway.

An S/L/T should notify EPA of any errors it discovers during the stakeholder review period. EPA will either adjust emission values or rerun the models and document the response and change.

For more information on these data categories, see Section 9, "Reporting Instructions for Onroad and Nonroad Activity" and Section 10, "Reporting Instructions for Onroad and Nonroad Emissions."

1.12.3 Event

Event emissions, such as wildfires, prescribed burns, and similar sources, are categorized separately from point, nonpoint, and mobile emissions sources. "Events" or the underlying activity causing or associated with the emissions are defined geographically and temporally. The reporting formats provide more than one option for both the spatial and temporal representation of events to allow for either detailed, individualized event data, or aggregated data by County and year.

For more information, see Section 11, "Reporting Instructions for Event Emissions."

1.12.4 Biogenic

Although the CERR has required S/L/Ts to report biogenic emissions for their jurisdictions since 2002, most Agencies have accepted the emissions calculations for biogenic sources included in the preliminary inventory without changes and without attempting to calculate these emissions independently. Reflecting this practice, EPA has assumed responsibility for the calculation of biogenic emissions data for the 2008 inventory, and the EIS will not accept the submission of biogenic data from S/L/Ts nor will EPA accept suggested changes to the EPA calculated biogenic emissions. Therefore, the proposed process for this category of emissions involves EPA responsibilities and actions.

EPA calculation of biogenic emissions is created independently of the EIS Production Environment. It will be made available when public access is provided to the General Purpose Release.

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