

Guidance and Reporting Instructions on Temporary E-reporting for the MATS Rule

As explained in the interim MATS e-reporting rule, which was signed by the Administrator on March 9, 2015, the EPA plans to merge the electronic reporting requirements for the MATS rule from two systems – the CEDRI and the ECMPS Client Tool - into one system, the ECMPS Client Tool. Until the ECMPS Client Tool is able to accept all MATS reports electronically, EGU owners or operators are to submit to the ECMPS Client Tool Portable Document Format (PDF) versions of the reports that the original MATS rule required to be submitted using the CEDRI.

The specific reports that must be submitted in PDF format include:

- Quarterly and annual performance stack test reports;
- 30- (or 90-) boiler operating day mercury (Hg) Low Emitting EGU (LEE) test reports;
- Relative Accuracy Test Audits (RATA) reports for sulfur dioxide, hydrogen chloride, hydrogen fluoride, and Hg monitors;
- Relative Calibration Audit (RCA) and Relative Response Audit (RRA) reports for particulate matter (PM) continuous emissions monitoring system (CEMS);
- 30- boiler operating day rolling average reports for PM CEMS, PM continuous parameter monitoring system (CPMS), and approved hazardous air pollutants (HAP) metals CEMS; and
- Semiannual compliance reports.

The Electronic Reporting Tool (ERT) can verify emissions calculations independently, include all raw field and laboratory data as attachments, and generate a full PDF report that could be submitted to ECMPS with minimal effort. However, the ERT is not the sole means of developing PDF versions of required reports. While we believe that some EGU owners or operators may choose to use the ERT's cost-effective PDF creation approach when possible, the rule does not require its use.

As discussed in the preamble to the final rule, for the required performance stack tests, Hg LEE tests, RATAs, RRAs and RCAs, affected sources may, as an alternative to ERT's PDF creation approach, submit, in PDF format, the types of test reports that testing contractors and in-house emission testing groups have historically submitted to State and local air agencies, provided that the reports (1) are complete; and (2) contain sufficient information to assess compliance and to determine whether the testing has been done properly. Test reports that meet these criteria will typically include:

- A description of the source;
- The test date(s);
- A list of attendees;
- A test protocol;
- A summary of results;
- Raw field data;
- Example calculations; and

- Depending on the method(s) used, may also include the results of sample analyses, quality-assurance information (e.g., leak, bias and drift checks), and instrument calibrations and calibration gas certificates.

We expect that the ECMPS Client Tool will be ready to accept all MATS rule-related electronic reporting by the 2017 date specified in the final rule. The second part of our phased approach will commence at that point, and ECMPS is expected to be the sole means for providing MATS reports electronically. However, if unexpected circumstances should arise that prevent the Agency from completing the revisions to ECMPS by the specified date, the ERT will be able to handle all of the remaining MATS rule-related test methods, quality-assurance approaches, and performance specifications.

REPORTING PROCESS

Only Designated Representatives (DRs), Alternate Designated Representatives (ADRs), and their agents who have “Submit Agent” status in the CAMD Business System (CBS) will be able to submit reports during the transition period (see Note below). Such users will log in to the ECMPS Client Tool as usual in order to use the MATS PDF Submit functionality. After accessing the MATS PDF Submit module and selecting the affected facility, the user will be asked to verify the accuracy of the information presented. This information will include the facility name, physical address, mailing address (if different from the physical address), county, ORIS code, FRS ID (Facility Registry System ID), monitoring location (i.e., unit, common stack, or multiple stack), and the name, title, mailing address, and phone number of the Responsible Official (RO) for the facility (the DR is the default RO unless an RO is specifically designated for the facility in CBS).

An editable field for the facility physical address must be filled in the first time the user visits this screen. This field will auto-populate on subsequent submissions and can be edited if needed. If any of the information is found to be inaccurate, the person making the submittal will need to go to the CAMD Business System website to correct the information.

Instructions for reporting the additional information that must accompany each PDF submittal during the transition period are provided in the following sections.

(Note: EPA recommends that the “Responsible Official” (RO) described in §63.10031(f)(6)(xi) of the MATS Rule be the same person as the DR or ADR for the applicable Part 75 program(s) (i.e. the Acid Rain Program and/or the Transport Rule). However, an affected facility may opt to assign a person who is not the DR or ADR to be the RO. If so, the RO may not submit reports during the transition period unless he or she has been given “Submit Agent” status by the DR or ADR. If an affected EGU is not in any Part 75 programs and does not have a DR or ADR, then either the RO or an agent of the RO who has been given Submit Agent status may submit the reports.)

DATA ELEMENTS

In the MATS PDF Submit module, the delegated agent must provide the following information for each submission.

Element Name: Averaging Group

If an affected EGU (or EGUs) which is monitored individually or a monitored common stack is included in an emissions averaging group, indicate this by reporting the appropriate selection from Table 1.

**Table 1
Emissions Averaging Group Descriptions**

Averaging Groups
The EGU(s) or monitored common stack is/are not in an emissions averaging group
The EGU(s) or monitored common stack is/are in a 30-boiler operating-day averaging group
The EGU(s) or monitored common stack is/are in a 90-boiler operating-day averaging group

Element Name: Report Type

Report the applicable Report Type from Table 2 for which the report demonstrates compliance. For pollutants other than Hg, when you have accumulated the necessary 3 years of performance stack tests to demonstrate that the EGU qualifies as a LEE, report the “LEE Qualification Test” rather than “Quarterly or Annual Performance Stack Test” for the final stack test in the 3-year period.

**Table 2
Report Type Descriptions**

Report Types
RATA of an HCl, HF, SO ₂ , or Hg Monitoring System
RCA of a PM CEMS
RRA of a PM CEMS
30-Day Rolling Averages (for PM CEMS, PM CPMS, and HAP metals CEMS only)
Semi-annual Compliance Report
Notification of Compliance Status
Quarterly or Annual Performance Stack Test
LEE Qualification Test

Element Name: Pollutant

Report one or more pollutants addressed in the report. If you have elected to comply with a total HAP metals standard, either for all of the HAP metals (oil-fired units, only) or for the non-Hg HAP metals, you must report all of the individual HAP metals covered by the standard. Leave this field blank if there are no pollutants associated with the report.

**Table 3
Pollutant Descriptions**

Pollutants
Filterable Particulate Matter
Hydrogen Chloride
Hydrogen Fluoride
Mercury
Sulfur Dioxide
Non-Hg HAP metals (List comprised of elements enumerated below)
Antimony (Sb)
Arsenic (As)
Beryllium (Be)
Cadmium (Cd)
Chromium (Cr)
Cobalt (Co)
Lead (Pb)
Manganese (Mn)
Nickel (Ni)
Selenium (Se)

Element Name: Test Method

Report one or more test methods used, for quarterly or annual performance stack tests, LEE qualification and on-going demonstration tests, RATAs, RCAs, and RRAs, as applicable. Leave this field blank for all other reports.

**Table 4
Reference Method Codes**

Reference Methods
Method 1
Method 2
Method 2A
Method 2C

Reference Methods
Method 2F
Method 2G
Method 2H
Method 3A
Method 3B
Method 4
Method 5
Method 5D
Method 6C
Method 19
Method 26
Method 26A
Method 29
Method 30B
Method 320
Method CTM-041
ASTM- D6348-03
ANSI/ASME PTC19.10-1981
ASTM D6784-02- (Ontario Hydro Method)

Element Name: Test Number

For performance stack tests, LEE tests, RATAs, RCAs, and RRAs, report a unique test number for each set of records which comprises a single test. Leave this field blank for all other reports.

Element Name: Test Date

For performance stack tests, LEE tests, RATAs, RCAs, and RRAs, report the date the test was conducted. Leave this field blank for all other reports.

Element Name: Test Comment

Report a comment regarding the test, if needed.

Element Name: PDF File

Use this field to verify that you have attached the appropriate PDF file for the submission.

SUBMISSION

As with standard submissions in ECMPS, the individual making the submittal must certify that the information provided is true and accurate. In addition, he or she must agree with the certification statement, and provide his or her CBS user name, password, and answer to the challenge question.

RECEIPT

A submission history report will be generated for each submission.