United States Environmental Protection Agency

PRIVACY IMPACT ASSESSMENT

(Rev 2/2026 – All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official.
All entries must be Times New Roman, 12pt, and start on the next line.
If you need further assistance, contact your LPO. A listing of the LPOs can be found here:
https://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO Roster.docx

System Name: Clean Air Markets Division (CAMD) Business Systems (CAMDBS)		**System Owner:** Brian Fischer	
Preparer: Doug Huston		**Office:** Office of Air and Radiation-Office of Clean Air Programs- Industrial Processing and Power Division (OAR-OCAP-IPPD)	
Date: 7/13/2026		**Phone:** 919-4515919	
Reason for Submittal:			
New: ☐	Revised: ☐	Annual Review: ☒	Rescindment: ☐
System Lifecycle Stage(s):			
Definition: ☐	Development/Acquisition: ☐	Implementation: ☐	
Operation & Maintenance: ☒	Rescindment/Decommission: ☐		

Note: New and Existing Systems require a PIA annually, when there is a significant modification to the system or where privacy risk has increased to the system. For examples of significant modifications, see OMB Circular A-130, Appendix 1, Section (c) (1) (a-f).

The PIA must describe the risk associated with that action. For assistance in applying privacy risk see OMB Circular No. A-123, Section VII (A) (pgs. 44-45).

Provide a general description/overview and purpose of the system:

Clean Air Markets Division Business System, also known as CAMD Business System (CAMDBS), is an EPA major information system (MIS). CAMDBS was developed to maintain and operate a business-to-business Internet based emissions trading portal to implement legislative mandates and electric utility industry compliance.

CAMDBS serves as the primary shared data source and foundation for all current and future applications operated by OAR/OAP/ Industrial Processing and Power Division (IPPD). CAMDBS database contains the official inventory of facilities regulated or potentially regulated by IPPD supported emissions trading programs. CAMDBS stores and maintains facility, unit, contact, program, and regulatory agency information.

CAMDBS supports the implementation of market-based air pollution control programs administered by the Industrial Processing and Power Division (IPPD), within the Office of Air and Radiation. These programs include the Acid Rain Program, established by Title IV of the Clean Air Act Amendments of 1990, and regional programs designed to reduce the transport of ozone. These emissions trading programs allow regulated facilities (primarily electric utilities) to adopt the most cost-effective strategies to reduce emissions at their units. CAMDBS is an application used by Federal, State, EPA, Industry and public stakeholders.

CAMDBS performs the following functions:

- Manages facility, unit and user account data
- Incorporates emissions allowance management
- Tracks NOx and SO2 allowances owned by utilities, government agencies, private citizens and organizations
- Processes monitoring plans and certification applications
- Allows access to CAMDBS for system administration
- Conducts reconciliation of NOx and SO2 allowances owned by utilities to ensure they own adequate allowances to offset emissions
- Monitors compliance with the Acid Rain Program emissions rate requirements
- Provides public access to facilities, account and emissions information

Section 1. Authorities and Other Requirements

1.1 What specific legal authorities and/or Executive Order(s) permit and define the collection of information by the system in question?

42 U.S.C. § 7401- Acid Rain Program (ARP)

42 U.S.C. §7410 and 42 U.S.C. §7601 - Cross State Air Pollution Rule (CSAPR)

42 U.S.C. § 7412(n)(1)(A) - Mercury and Air Toxics Standards (MATS)

18 U.S.C 1001 - Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units (NSPS4T)

1.2 Has a system security plan been completed for the information system(s) supporting the system? Does the system have, or will the system be issued an Authorization-to-Operate? When does the ATO expire?

Yes.

CAMDBS was issued an ATO and is currently operating on an extension of the original.

The expiration is Oct 2026.

1.3 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

OMB No. 2060-0258

OMB No. 2060-0667

1.4 Will the data be maintained or stored in a Cloud? If so, is the Cloud Service Provider (CSP) FEDRAMP approved? What type of service (PaaS, IaaS, SaaS, etc.) will the CSP provide?

Yes. GSA is hosted in Gov Cloud which is FedRAMP approved. The Environmental Protection Agency (EPA) offers cloud.gov, an authorized Platform-as-a-Service (PaaS) environment that facilitates application deployment. It's operated by the General Services Administration (GSA) for EPA.

Section 2. Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

2.1 Identify the information the system collects, uses, disseminates, or maintains (e.g., data elements, including name, address, DOB, SSN).

The system collects Name, Business Address, and Business Phone

2.2 What are the sources of the information and how is the information collected for the system?

Data is submitted primarily by regulated facilities, through a designated representative or alternate designated presentative. Agents who act on behalf of the representatives can also submit data. Regulated facilities submit information on facility attributes, monitoring attributes, and hourly emission data. Information on allowance transfers is also submitted. The facility and allowance data is collected via the CAMD Business System (CBS). The emissions, quality assurance and monitoring plan information is collected via the Emissions Collection Monitoring Plan System (ECMPS).

2.3 Does the system use information from commercial sources or publicly available data? If so, explain why and how this information is used.

No

2.4 Discuss how accuracy of the data is ensured.

CAMDBS contains extensive internal controls to ensure data integrity and completeness. The system also logs all user actions and sends confirmation messages, documenting any update, to the officials responsible. All data is quality assured, validated, and verified prior to entry. Quality assurance is built into applications with a series of tests that allow data correction. Only quality assured data is allowed submission to the CAMDBS

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Discuss the privacy risks identified for the specific data elements and for each risk explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included

Privacy Risk:

Low risk of inaccurate data

Mitigation:

The accuracy of the data is verified before acceptance. The ECMPS has a series of quality assurance checks that users must utilize before submission of the data.

Section 3. Access and Data Retention by the System

The following questions are intended to outline the access controls for the system and how long the system retains the information after the initial collection

3.1 Do the systems have access control levels within the system to prevent authorized users from accessing information they don't have a need to know? If so, what control levels have been put in place? If no controls are in place, why have they been omitted?

Yes. Each user in the CAMD Business System is assigned a role. The primary roles are Administrators and Industry. Administrators have all access. Industry users have update access. As an industry user, only the individuals' information can be viewed or modified. All Industry access is limited to the information that pertains to them or the facilities for which they have responsibility.

3.2 In what policy/procedure are the access controls identified in 3.1, documented?

Access control policy and procedures documented in the System Security Plan (SSP).

3.3 Are there other components with assigned roles and responsibilities within the system?

No, there are no other components to the assigned roles and responsibilities within the system.

3.4 Who (internal and external parties) will have access to the data/information in the system? If contractors, are the appropriate Federal Acquisition Regulation (FAR) clauses included in the contract?

AGENCY: EPA CAMD, EPA Other, State/Local/Tribal

INDUSTRY: Allowance Broker/Trader, Business Consultant, DAHS Vendor, Legal Counsel, Plant/Company Management

Contractors: Federal Acquisition Regulations (FAR) clauses are included in the contract

(24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)

3.5 Explain how long and for what reasons the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number.

The retention period and procedures for electronically reported information for the CBS is deleted/destroyed 20 years after transfer. The electronically reported records for the CBS and ECMPS are permanent. A record control schedule has been issued for the records in the Clean Air Markets Division Business System (CAMDBS).

Schedule #0041 Clean Air Markets Division Business System (CAMDBS).

3.6 Privacy Impact Analysis: Related to Retention

Discuss the risks associated with the length of time data is retained. How were those risks mitigated? The schedule should align the stated purpose and mission of the system

Privacy Risk:

Low Risk – Data Integrity for the large volume of data.

Mitigation:

Create an Audit Trail

Develop Process Maps for Critical Data

Eliminate Known Security Vulnerabilities

Validate Computer Systems Annually

Section 4. Information Sharing

The following questions are intended to describe the scope of the system information sharing external to the Agency. External sharing encompasses sharing with other federal, state and local governments, and third-party private sector entities.

4.1 Is information shared outside of EPA as part of the normal agency operations? If so, identify the organization(s), how the information is accessed and how it is to be used, and any agreements that apply.

No.

4.2 Describe how external sharing is compatible with the original purposes of the collection.

Not applicable. No external sharing

4.3 How does the system review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within EPA and outside?

Not applicable. There are no information sharing agreements, MOUs or other new uses of the information.

4.4 Does the agreement place limitations on re-dissemination?

Not applicable. There are no agreements.

4.5 Privacy Impact Analysis: Related to Information Sharing

Discuss the privacy risks associated with the sharing of information outside of the agency. How were those risks mitigated?

Privacy Risk:

None – No privacy risks related to information sharing.

Mitigation:

None.

Section 5. Auditing and Accountability

The following questions are intended to describe technical and policy-based safeguards and security measures.

5.1 How does the system ensure that the information is used as stated in Section 6.1?

CAMDBS contains extensive internal controls to ensure data integrity and completeness. The system also logs all user actions and sends confirmation messages, documenting any updates to the designated representatives.

The data collected by the CAMDBS relates, almost exclusively, to facility profiles and operations, as necessary for administering programs mandated by the Clean Air Act. All data to be collected is defined in the Agency's Information Collection Requests (ICR) submissions. This is subject to oversight and affected entity comment. Auditable events are reviewed weekly by the System Owner (SO) and CAMDBS administrators. The list of auditable events within the CAMDBS system is reviewed annually, and if necessary updated, as part of the assessment process annually and when technology changes occur.

5.2 Describe what privacy training is provided to users either generally or specifically

relevant to the system/collection.

For EPA CAMDBS users, Information Security and Privacy Awareness Training is conducted annually. This training is mandatory and if not completed will result in system lockout.

For the regulated community, privacy training is generally provided relevant to system collection in the form of review and acknowledgement of a Rules of Behavior form. All users must acknowledge and sign the Electronic Signature agreement detailed below:

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Discuss the privacy risks associated with the technical and policy-based safeguards and security measures. How were those risks mitigated?

Privacy Risk:

Low Risk – Unauthorized access to PII (name).

Mitigation:

Implement audit procedures

Ascertain the breach

Disable the account.

Section 6. Uses of the Information

The following questions require a clear description of the system's use of information.

6.1 Describe how and why the system uses the information

List each use (internal and external to the Department) of the information collected or maintained. Provide a detailed response that states how and why the different data elements will be used. If Social Security numbers are collected, state why the SSN is necessary and how it was used.

The Agency uses the information to determine compliance with Title V Acid Rain Program

(ARP) and Title IV of the Clean Air Act Amendment of 1990. Implementation of the Cross State Air Pollution Rule (CSAPR), Mercury Air Toxics (MATS), and NOx SIP Call, and other CAA rules.

Allowance trading allows sources in cap-and-trade programs to adopt the most cost-effective strategy to reduce emissions. Affected sources are required to install systems that continuously monitor emissions of SO2, NOx, and other related pollutants in order to track progress and ensure compliance. Sources that reduce their emissions below the number of allowances they hold may trade allowances with other sources in their system, sell them to other sources on the open market or through EPA auctions, or bank them to cover emissions in future years.

Sources regulated by the CAMD programs must follow the monitoring regulations in Part 75 of Volume 40 of the Code of Federal Regulations (CFR), which requires continuous monitoring and reporting of sulfur dioxide (SO2), carbon dioxide (CO2), and nitrogen oxide (NOx) emissions.

Under the Acid Rain Program, one allowance is equivalent to 1 ton of SO2 during a given year or any subsequent year. Under CSAPR, there are annual NOx and SO2 allowances, as well as seasonal NOx

allowances. At the end of each year or ozone season, the source must hold an amount of allowance at least equal to its emissions for that time. For example, a source that emits 5,000 tons of SO2 must hold at least 5,000 allowances that are usable in that year. Regardless of how many allowances a source holds, however, it is never entitled to exceed the limits set under Title I of the Act to protect public health.

6.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes: ☐ No: X If yes, what identifier(s) will be used.

A personal identifier is a name, social security number or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual. Or any identifier that can be linked or is linkable to an individual.

CAMDBS strictly adheres to NIST 800-122 to protect the PII of name. The system uses CDX Id's to retrieve user info using CDX's SOAP Services. The CAMDBS database stores CDX Id, name, and email address.

The non-sensitive data has been:

- Identified as residing in the system
- Minimized regarding use, collection, and retention
- Categorized by the PII confidentiality impact level
- Provided with the appropriate safeguards based on the PII confidentiality

impact level

- An Incident Response Plan has been developed to handle breaches involving PII

The CAMDBS maintains close coordination of the relevant experts to help prevent incidents that could result in the compromise and misuse of PII.

6.3 What type of evaluation has been conducted on the probable or potential effect of the privacy of individuals whose information is maintained in the system of records?

The goal here is to look at the data collected, how you plan to use it, and to ensure that you have limited access to the people who have a need to know in the performance of their official duties. What controls have you erected around the data, so that privacy is not invaded? ex. administrative control, physical control, technical control.

CAMDBS strictly adheres to NIST 800-122 to protect the PII of name.

The non-sensitive data has been:

- Identified as residing in the system
- Minimized the use, collection, and retention
- Categorized by the PII confidentiality impact level

▪ Applied the appropriate safeguards based on the PII confidentiality

impact level

▪ An Incident Response Plan has been developed to handle breaches involving PII

The CAMDBS maintains close coordination of the relevant experts and helps to prevent incidents that could result in the compromise and misuse of PII.

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6.4 Privacy Impact Analysis: Related to the Uses of Information

Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above.

Privacy Risk:

Low – Privacy risks of data availability, accuracy and completeness.

Mitigation:

Utilize system internal controls concerning data availability, accuracy, and completeness.

The CAMDBS Disaster Recovery Plan was developed in accordance with the EPA template and

- Addresses contingency roles and
- Responsibilities, assigned individuals with contact information, and
- Activities associated with restoring the system after a disruption or failure.

If no SORN is required, STOP HERE.

The National Privacy Program (NPP) will determine if a System of Records Notice (SORN) is required. If so, the following additional sections will be required.

Section 7. Notice

The following questions seek information about the system's notice to the individual about the information collected, the right to consent to uses of information, and the right to decline to provide information.

7.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

Any individual who wants to know whether this system of records contains a record about him or her, should make a written request to the Attn: Agency Privacy Officer, MC 2831T, 1200 Pennsylvania Ave., NW., Washington, D.C. 20460, privacy@epa.gov.

7.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt-out of the collection or sharing of their information?

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7.3 Privacy Impact Analysis: Related to Notice

Discuss how the notice provided corresponds to the purpose of the project and the stated uses. Discuss how the notice given for the initial collection is consistent with the stated use(s) of the information.

Describe how the project has mitigated the risks associated with potentially insufficient notice and opportunity to decline or consent.

Privacy Risk:

Click or tap here to enter text.

Mitigation:

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Section 8. Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

8.1 What are the procedures that allow individuals to access their information?

Individuals seeking access to information in this system of records about themselves are required to provide adequate identification (e.g., driver's license, military identification card, employee badge or identification card). Additional identity verification procedures may be required, as warranted.

Requests must meet the requirements of EPA regulations that implement the Privacy Act of 1974, at 40 CFR part 16.

8.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are described in EPA's Privacy Act regulations at 40 CFR part 16.

8.3 Privacy Impact Analysis: Related to Redress

Discuss what, if any, redress program the project provides beyond the access and correction afforded under the Privacy Act and Freedom of Information Act (FOIA).

Privacy Risk:

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Mitigation:

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I attest as the Agency Privacy Officer that **Clean Air Markets Division (CAMD) Business Systems' (CAMDBS)** Privacy Impact Assessment (PIA) has been reviewed. The privacy implications have been adequately identified with appropriate mitigation statements included for implementation in the development or use of information technology systems.

Respectfully,

ROBERT KELLY

Digitally signed by ROBERT KELLY
Date: 2026.09.02 16:39:25 -04'00'

Lee Kelly
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