



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 11 2014

OFFICE OF
AIR AND RADIATION

Mr. Charles E. Dene
Manager, Air Emissions Monitoring and Control
Electric Power Research Institute
3420 Hillview Avenue
Palo Alto, CA 94304

Dear Mr. Dene:

During the 2013 EPRI CEM Users Group meeting and subsequent MATS implementation meetings, several industry representatives expressed a strong preference for the Agency to consolidate electronic reporting requirements found in the MATS rule. A consolidation of the electronic reporting requirements would enable industry to submit all electronic data to the Agency through a single data system, i.e., the Emissions Collection and Monitoring Plan System (ECMPS). We understand that this reporting approach has the potential to reduce industry's reporting burden without compromising MATS reporting requirements. Therefore, we are open to the idea of working with you and other interested stakeholders to consolidate the electronic data submission requirements to allow for submission through the ECMPS system.

We also believe that pursuing this effort would provide the opportunity to expand the reporting of particulate matter (PM) data to hourly measurements for those facilities that elect to use PM CEMS or CPMS monitoring for compliance purposes. This change would also make PM reporting consistent with current requirements for mercury, HCl and HF reporting through ECMPS.

We are also considering alternative XML reporting formats for performance test results and compliance reports to make it easier for sources to submit that data through ECMPS as well. Consolidating the electronic reporting requirements into the ECMPS system involves several technical challenges that the Agency would need to resolve. In addition, we recognize these requirements would likely require rule changes.

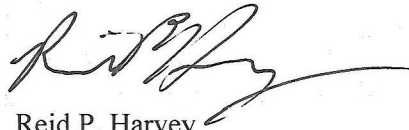
Though we are not committing to any rule changes at this time, given the industry interest and potential benefits of such an approach, we would be interested to engage in an informal meeting with you and other stakeholders to discuss the possibility of pursuing this effort to consolidate reporting of MATS electronic data through the ECMPS software tool. Please contact Reynaldo Forte (forte.reynaldo@epa.gov) or 202-

343-9134) or Bob Schell (schell.bob@epa.gov or 919-541-4116) to let us know your thoughts on this or if you have any questions.

Sincerely,



Peter Tsirigotis
Director, Sector Policies and Programs Division
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Reid P. Harvey
Director, Clean Air Markets Division
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cc:

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