REPORTING CHANGES ARE COMING

New Part 75 Reporting Process. Significant changes are coming to the way utilities report emissions data for both Part 75 and the Mercury and Air Toxics Standards (MATS) Rule. The changes to the MATS reporting are related to the rule revisions published last September, whereas the Part 75 changes are being driven by the Clean Air Market Division's (CAMD's) plans to replace the Emission Collection and Monitoring Plan System (ECMPS), the PC-based client software tool that is currently used to submit Part 75 electronic data files (EDRs), with a web-based application. While the same data will be reported, EPA will require sources to switch reporting from the current XML to a new JSON format under the new system.
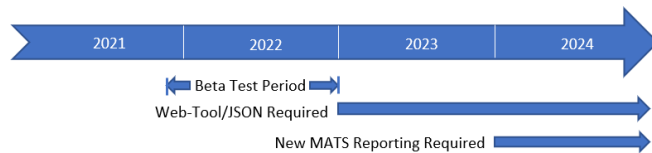

Figure 1. Simplified CAMD Re-Engineering Timeline

EPA first plans to make a beta version of the web tool that includes monitoring plan features available in November 2021 and will add QA and emissions functions in 2022. Unlike when it rolled out the new XML reporting requirements, the Agency will not have a phase-in period when sources can report data using either format. Instead, all sources will be required to submit their EDRs in JSON format using the new web-based tool starting in January 2023. Any existing MATS data now reported in XML will also need to be reported in JSON starting in 2023 while the new MATS electronic reporting requirements (discussed below) will begin in 2024.

New MATS Reporting Requirements. When the MATS Rule was first published, utilities faced the prospect of a complicated mix of electronic reporting. The rule originally required some data to be reported through ECMPS, but other data to be reported using the Electronic Reporting Tool (ERT) and/or the Compliance and Emissions Data Reporting Interface (CEDRI) with limited guidance for individuals struggling with how they would address those requirements. Agora formed a utility workgroup that has been working with the Agency to streamline these requirements. EPA agreed that the requirements could be improved and instituted interim PDF reporting provisions while it worked on changes to allow all the MATS data to be reported using ECMPS in XML.

The MATS reporting revisions finalized in September 2020 extended the interim PDF reporting requirements through 2023. The new MATS electronic reporting requirements apply starting in 2024, but utilities will have to report MATS data using JSON and the new web-based reporting tool in 2023 as discussed above since MATS and Part 75 data are reported together. Among other changes, the new requirements include reporting of hourly PM CEMS data, reporting of compliance 30-day averages and performance test summaries in the new quarterly compliance reports that replace the semi-annual reports, and detailed supplemental data files for any stack test (performance test, RATA, etc.).

Implementing the new requirements by 2024 will be a challenge. However, even with the supplemental stack test data, the new requirements have been streamlined in comparison to the ERT and represent a substantial improvement over the original reporting requirements.

MATS DEVIATIONS

The September 2020 update to the MATS Rule included a significant change to how deviations are reported. §63.10010(h)(6) now requires that (1) any monitoring system malfunctions and (2) any data collected during periods when the monitoring system is out of control (i.e., invalid due to failing a QA/QC requirement), including periods when repairs are made or QA/QC is performed when the monitoring system is out of control be reported as "deviations" in your Semi-Annual Compliance Reports (or in your quarterly compliance reports starting in 2024).

While a deviation is not always a "compliance violation," per se, the stigma of a deviation is something that a utility should wish to avoid and keep to a minimum wherever possible. The following table summarizes what is now considered a deviation based on the September 2020 MATS revisions:

Deviation	Not A Deviation
● CEMS Malfunction ● DAHS Malfunction ● CEMS Out-of-Control (OOC) ● QA/QC During OOC Periods ● Monitor Downtime (if OOC)	● Non-Monitoring Malfunction ● QA/QC Activities (if not OOC) ● Routine Maintenance (if not OOC)

Looking for assistance with reporting? Agora provides a wide range of reporting services from full EDR preparation with remote review of CEMS data and QA/QC activities to quarterly report reviews to case-by-case support interpreting ECMPS error messages or regulatory issues. Contact Mike O'Connell at (919) 791-3132 or oconnell@agoraenv.com for more information about how we can help you with your reporting issues.

Need help staying on top of changes to the electronic reporting requirements? Agora coordinates an industry workgroup focused on working with EPA to improve and streamline electronic reporting requirements affecting electric utilities. The workgroup serves as a resource for our members to stay up to date on the changes and plays an important role working with EPA on reporting instructions and other important details needed to smoothly implement the changes. Contact Steve Norfleet at (919) 791-3123 or norfleet@agoraenv.com to learn how to join the electronic reporting workgroup.

Interested in training on reporting, emissions monitoring, or regulatory issues? Whether as part of our multi-day CEMS training program, specialized training workshops, or through customized on-site or web-based training, Agora provides training to address your company's needs. Contact Robert Bivens at (919) 791-3133 or bivens@agoraenv.com to discuss Agora's training options.

Are you addressing all the requirements? Don't be caught by monitoring or reporting details that you may have overlooked and be hit with an unexpected compliance issue. Agora's comprehensive audit services have proven to be a valuable tool for many clients to ensure that their monitoring programs comply with the applicable regulations and permit requirements. Contact Steve Norfleet at (919) 791-3123 or norfleet@agoraenv.com to talk about our variety of audit services.