POINT INVENTORY COURSE

May 15, 2018

# Questions and Answers

1. **What is the obligation of tribes to report to NEI?** As prescribed by the Tribal Authority Rule (63

FR 7253, February 12, 1998), codified at 40 CFR part 49, subpart A, tribes may elect to seek Treatment as State (TAS) status and obtain approval to implement rules such as the AERR through a Tribal Implementation Plan (TIP), but tribes are under no obligation to do so. However, those tribes that have obtained TAS status are subject to the AERR to the extent allowed in their TIP. Accordingly, to the extent a tribal government has applied for and received TAS status for air quality control purposes and is subject to the AERR under its TIP, the use of the term state(s) in the AERR shall include that tribal government and use of the term State Implementation Plan(s) or SIP(s) shall include that TIP

1. **Could CAMD data be shared with NEI?** It is difficult to deal with the many data flows coming to EPA for different programs, because of the different IDs that are used for facility-level and unit-level information. This issue is something that is relevant to the Combined Air Emissions Reporting (CAER) project as part of the E-Enterprise collaborative efforts among the EPA, States, and Tribes. While the CAMD data flow has not been targeted specifically, it is a possibility that improvements in data sharing from E-Enterprise could facilitate the data sharing you mention. For the present, CAMD does make their data available on their website, and EIAG does grab that data and load it into EIS at the same units as the S/L/Ts use, relying on the set of CAMD IDs that have been attached to those EIS units. Those IDs are available for review by using the EIS Facility Configuration report for Alt Unit IDs, and side-by-side emissions summary comparison reports for the CAMD and S/L/T-reported emissions can be run from EIS Reports page.
2. **What are the criteria for site-level duplicate checking?** It’s a points-based system. Lat-Lon, NAICS at 3 or 4 digits, Name, County. First three (Lat, Lon, NAICS) are the primary drivers. About one quarter of the potential flagged duplicates are eventually identified as the same facility, although this varies by S/L/T agency and the type of facilities being submitted. Many of the oil&gas production facilities being added the past few years do get caught up as “false positives” due to their proximity, same NAICs, and same company name.
3. **Question on controls and having to re-enter the same information for the same controls, rather than just link to the same control ID.**  Controls are not treated as a separate piece of equipment like other facility attributes within EIS. So, even if the same control device is used by multiple units or processes, it needs to be entered into EIS again each time. Changes to this approach are being considered as part of the CAER E-enterprise work.
4. **Bridge Tool question on how/when will be updated.** The Bridge Tool is now entirely Microsoft® Access®-based, whereas before it was also using Java. This was a major change and we do not expect additional major changes to occur moving forward. The only change currently expected is to update the software to not rely on a third-party website, which seems to go down a lot and cause the Bridge Tool to fail when that website is not available. Other changes would just be to fix bugs.
5. **How can duplicates be prevented when using the Bridge tool?** The Bridge Tool does limited QA on the data prior to converting to XML. Duplicates is one of those checks. The tool also checks for widows/orphans and some required fields. Note that the duplicates checked by the Bridge Tool are strictly where rows in the loaded staging tables have exactly the same unique IDs. The Bridge Tool does not have on-line access to the stored EIS facilities, and does not do the comparisons that EIS does on locations-NAICs-name similarities for facilities that have different IDs.
6. **How do I use the Bridge Tool to fix things in the facility inventory? I haven’t been able to get this feature to work.**  If you just want to make edits to a set of release points for example, then you need to make sure that the IDs are cascaded up into the parent tables (the facility table in this RP case) to be able to make a change in sub-table. Check the EIS feedback report from your QA submittal to see if any critical errors will prevent the data from being loaded.
7. **Is it possible to change the state site ID using the EIS ID?** Yes, this is the preferable (and maybe the only) way to change a large number of IDs in bulk. The EIS Gateway provides on-line editing of individual IDs in a fairly intuitive way. For the bulk XML method, use the EIS ID (for facility, emission unit, emission process, or release point, whatever level of IDs you are interested in changing) in the main Bridge Tool table for that level as the identifier for EIS to use to find the existing element. If for one of the “child” tables (unit, process, or rel pt), you need to include the other “parent” element IDs in that same table, and also “cascade” those parent IDs up to their own Bridge Tool tables. Then put the desired new S/L/T IDs in as follows: for new facility or unit IDs, put them in the Alternative Facility Identification or Alternative Unit Identification tables (along with their EIS IDs). For new Emission Process or Release Point IDs, put those directly in the EmissionProcess or ReleasePoint tables (where you already have the corresponding EIS IDs). In all 4 cases, remember to fill-in your Agency’s Program System Code (that the new ID belongs to) and the 5 digit FIPs code.
8. **CDX Web Address has changed.** The CDX Web Client is located at <https://nodewebrss.epa.gov/nodewebrss/user/default.aspx>
9. **Can XML be used for partial uploads or does it have to be every facility?** Yes, you can submit an XML for one or many facilities or for individual or several emission processes, release points, or units, or for a whole county’s facilities, or any other variations.
10. **Where do you run the risk of the XML upload making things Null, if just updating the Units?** For updating Facility Inventory elements (units, processes, release points, controls, or site-level info), there is no “Delete” capability via XML. It will only overwrite the data elements already in EIS with whatever is in the xml submittal. The only place where there is a risk of deleting without replacing is when you submit emissions XMLs. In those cases EIS does a complete toss out of all pollutant emissions values for a given single process and dataset when it sees that process and dataset appear in an XML file, on the assumed operating principle that you are supplying a new complete integrated set of all the pollutants for that process. Only the pollutant and emissions values that are contained in your last point submittal for a given process ID will be retained in EIS.
11. **Is there anything that can be done before submitting a file to prevent the over-identification of “potential duplicates”?** You can review the feedback from a QA submittal, and if they really are duplicates you can take steps to place your XML’s submitted ID for the facilities onto the EIS facilities to avoid any ambiguity question in EIS. But for the ones that aren’t duplicates, no, you will need to submit them to EIS, have them get flagged, and request that they be allowed to be added as new. If you know that they are not duplicates, then you will need to send a support request to confirm that they are not duplicates. For multiple duplicates, this can be done with a single support request rather than multiple requests. You may also send an email to ryan.ron@epa.gov with an attachment if a long list, since EIS doesn’t support attachments.
12. **The NEI contains the most current facility inventory information that might different from previous years. Could the facility inventory be not representative when we get data for previous EIs?** That’s true.

**Also, in the state database, agency emission unit ID, EU001, was a boiler in the 2016 EI; in the 2017 EI facility went through a permitting re-issuance, the EU001 now is a spray booth. When we submit the 2017 EI, the NEI will change EU001 to spray booth. Does the original EU001, as a boiler, keep anywhere in the NEI facility inventory?** No, the EIS does not know that you are now using EU001 to refer to something completely different than what you told EIS the last time you submitted info for what you named “EU001”. You would have the same situation in the state database, unless there is an unchanging ID behind the scenes and you take steps to change the IDs attached to those unchanging IDs. EIS IDs provide that capability, but you would have to take steps to inform EIS of what your new State IDs are.

1. **Is there a submittal year specific limitation to QA environment is always open?** The QA environment is always open. The Facility Inventory is not year-specific, but the Point Emissions are year specific. This is true for both the Production and QA Environments. Blank Point Emissions Datasets do need to be created by EPA for each Agency and Emissions Year first in order to be available for S/L/T submittals to either the QA or Production Environments.
2. **Where is the requirements spreadsheet on the EIS training site?** <https://www.epa.gov/air-emissions-inventories/air-emissions-inventory-training>. If you scroll down to the table that has different data categories listed, the spreadsheets are available from the links labeled “Facility Staging Requirement” and “Point Staging Requirement”.
3. **What are the facility inventory tables?** The facility inventory tables are in the Facility/Point Bridge Tool. (Note that the Facility/Point Bridge Tool also contains the Point Emissions tables as well. The CERS schema defines which tables and fields are required or conditional for a Facility or a Point Emissions submittal. The CERS schema and Staging requirements are available for download at https://www.epa.gov/air-emissions-inventories/air-emissions-inventory-training ) The Bridge Tools are available for download at <https://www.epa.gov/air-emissions-inventories/air-emissions-inventory-tools>.
4. **With the site duplicate check, is the agency site identifier used?** The agency site identifier is used by EIS as the primary match to see if EIS already has that facility to update. Only if the submitted agency site identifier is not already existing in EIS from earlier years does EIS even check other data elements (Latitude, Longitude, NAICs, Name, zip code) to see if the submitted facility might be in EIS under a different ID (including no S/L/T ID, but only a TRI ID).
5. **Does EIS allow more than one throughput for one process?**  No. We are aware that for a few processes that the emission rate for some pollutants may be dependent upon and therefore estimated by a different throughput measure. If you choose to submit those different estimation throughputs to EIS you would need to split the reporting into two processes.
6. **The Bridge Tool sometimes does not work.** The XSD file you see in the error message is downloaded from an EPA website that is occasionally down. We are looking into how we can decouple this dependency.
7. **Are the presentations available for download?** All presentations are available for download at ftp://newftp.epa.gov/Air/nei/ei\_training\_may2018/ . If you have issues getting into the ftp, please check with your local IT people as it could be a security issue on your end.
8. **What Operating Status are available besides the one shown on the slide?** OP=Operating; PS=Permanently Shutdown; TS=Temporarily Shutdown; ONP=Operating but S/L/T Reporting in Nonpoint; and ONR= Operating but S/L/T Not Reporting.
9. **For metals, do you mean that you do not want us to report metal compounds as individual pollutants? Only as the single aggregated element?** For most metallic compounds, the only allowable pollutant is the metallic element, and you should report only the metal mass emitted to that pollutant code. There are a few metals where individual compounds (or grouped valences in the case of chromium) are also allowable. We would rather have the individual compounds reported if you know them, or the two valence groups (III and VI) in the case of chromium. But the aggregate element pollutant codes are available if you don’t have the individual compounds. There is a QA check that will not allow you to report the aggregated element AND the individual pollutants for a given process. Either report the total OR the individual pollutants.
10. **Can you look across years in a comparison report?** Absolutely. You select the Base Year that you want to do the comparison against and can select multiple years (up to 4) to compare.
11. **If you have a facility that does not have emissions reported for a particular year, how will it show in the comparison report?** The value for that year will be null.
12. **Are NAICS codes tied to SCCs?** No, they are not.Although there are some SCCs that are so specific that they may only ever occur within a single NAICs or a few similar NAICs, that is not generally the case, as evidenced by the large majority of many pollutant emissions that come from boilers, turbines, reciprocating engines, liquid storage and handling operations, etc. If we could always determine what the NAICs should be from the SCC reported, or vice-versa, we wouldn’t have to ask you to report both. If someone offers you a NAICs-to-SCC crosswalk, be sure to ask for what limited purposes it was built and how it can be used without introducing gross inaccuracies in your data.
13. **When was the last major SCC update and when will the next major SCC update be? When was the last major emissions factor (WebFire) update and when will the next major emissions factor (WebFire) update be?** Please check the SCC search page at <https://ofmpub.epa.gov/sccwebservices/sccsearch/> and the WebFIRE page at <https://cfpub.epa.gov/webfire/> for the latest info on these items.
14. **Is there a way to download all the Reporting Code Tables at once?** Not all at once. But you can download each table one at a time. Open the table and scroll to the bottom, select “Download CSV”. The downloaded file will open in Excel.
15. **Can codes be added to the tables? If so, how do you request to added codes?** In general, no. Many of the code tables, such as pollutants and units or measure, were established to account for all possible choices that we thought needed to be supported or that we could understand unambiguously. Some, such as NAICs, are established by other organizations to support connectivity to other datasets, such as economic statistics. SCCs are controlled by OAQPS, and can be requested via the SCC search page at https://ofmpub.epa.gov/sccwebservices/sccsearch/