

PRIVACY IMPACT ASSESSMENT

Please submit your responses to your Liaison Privacy Official
http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf.

If you need further assistance contact Marlyn Aguilar, at aguilar.marlyn@epa.gov or (202) 566-0012.

System Name: Clean Air Markets Division Business Systems (CAMDBS)

Preparer: Paula L. Branch

Office: OAR/OAP/CAMD/MOB

Date: August 23, 2018

Phone: 202-343-9168

Reason for Submittal: New PIA Revised PIA Annual Review Rescindment

This system is in the following life cycle stage(s):

Definition

Development/Acquisition

Implementation

Operation & Maintenance

Rescindment/Decommissioned

Note: 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 OMB Circular No. A-123, Section VII (A) (pgs. 44-45).

Provide a general description/overview of the system:

This Privacy Impact Analysis documents the CAMDBS applications and addresses the privacy risks and mitigation.

The Clean Air Markets Division Business System (CAMDBS) is an Internet-based portal that supports the operation of the emissions trading programs implemented by EPA. The CAMDBS consists of five applications to achieve its mission:

- CAMD Business System (CBS)
- Emissions Collection and Monitoring Plan System (ECMPS)
- Air Markets Program Data (AMPD)
- CAMD System Administrator (CSA)
- Field Audit Checking Tool (FACT)

The CAMD Business System (CBS) is the web application used by EPA and industry to submit required program information. Users can register new facilities and submit required facility, unit, representative, agent, owner/operator, and associated data for CAMD supported programs. Users can buy or sell allowances to cover annual or seasonal emissions, transfer allowances between user accounts, bid in the annual Acid Rain auction, and conduct annual reconciliation of emissions and allowances, from which compliance is determined.

process, and quality assure emissions data and monitoring plans. Users can quality assure hourly emissions data and then, via the internet, submit the quarterly emissions files.

Air Markets Program Data (AMPD) provides access to selected CAMDDBS data in the CAMDDBS data warehouse. Any business data reported to EPA is displayed in the AMPD web-based application. Users may retrieve emissions, deposition, allowance, and inventory data. Access to AMPD data is read-only.

The CAMD system administrator application (CSA) is a client-server tool that provides desktop access to the CAMDDBS database to perform a variety of system administration functions.

The Field Audit Checking Tool (FACT) was developed to enhance Part 75 continuous emission monitoring system (CEMS) field audits.

Users must be recognized as a designated representative (primary or alternate) or an agent of a designated representative in the CAMD database to submit data to EPA using CBS or ECMPS. To have the responsibility as a designated representative, an established user can use CBS, or submit the paper Certificate of Representation form. To become an agent, you can use CBS Manage Agents module or submit the paper Agent Delegation form. Once recognized as either a designated representative or an agent in the system, a user account is created and the user can register to use CBS and ECMPS on-line.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the system in question?

Acid Rain Program (ARP)

• Title IV of the 1990 Clean Air Act (CAA)

• Part 75 of Volume 40 of the CFR

• Cross State Air Pollution Rule (CSAPR)

• National Ambient Air Quality Standards (40 CFR part 50)

• 80 FR 75706

• 80 FR 81251

• 80 FR 46271

• 80 FR 52271

Mercury and Air Toxics Standards (MATS)

40 CFR Part 63

Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units (NSPS4T)

40 CFR 60, Subpart TTTT

1.2 Has a system security plan been completed for the information system(s) supporting the system?

Yes

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

Section 2.0 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 CAMDBS collects information to be used for user account creation. The human asset data is the facility Representative. The Representative data includes the representative name, business address, business telephone number and business email. Also collected are Information References of technical data, environmental indicators and program evaluation criteria. Environmental activities data include monitoring data, assessment results, compliance and technical assistance data, and finally program management and support data. Substances data are chemicals. Facility data are facilities and monitoring stations. The sources are point sources.

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

2.3 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 responsible officials. All data is quality assured, validated, and verified prior to entry. Quality assurance is built into the applications with a series of tests that allow data correction. Only quality assured data is allowed submission to the CAMDBS.

2.4 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risks: Low - accuracy of data

Mitigation:

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

Section 3.0 Uses of the Information

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

3.1 Describe how and why the system uses the information.

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, NO_x, 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 (NO_x) 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 NO_x and SO₂ allowances, as well as seasonal NO_x allowances. At the end of each year or ozone season, the source must hold an amount of allowances at least equal to its emissions for that time period. For example, a source that emits

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.

- 3.2 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.)**

Information is retrieved by the Facility Identifier.

- 3.3 If the system retrieves information by personal identifier, what types/elements of information about the user are being retrieved?**

Not Applicable

- 3.4 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

System of Records (SOR) notice not required.

- 3.5 Does the system use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how EPA plans to use such results.**

No

- 3.6 Privacy Impact Analysis: Related to the Uses of Information**

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.

Section 4.0 Notice

The following questions seek information about the system's notice to the individual about the information collected, the right to correct or erase information, and

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

Yes, users read the Rules of Behavior, sign and submit the following Certification Statements prior to being granted access to the system.

Monitoring Requirements

- The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

For Designated or Alternate Designated Representatives

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment

For Authorized or Alternate Authorized Representatives (For General Accounts)

I am authorized to make this submission on behalf of the persons with an ownership interest with respect to the Acid Rain Program, CSAPR SO₂ Group 1, CSAPR SO₂ Group 2, CSAPR NO_x Annual, CSAPR NO_x Ozone Season Group 1, or CSAPR NO_x Ozone Season Group 2 Trading Program (as designated in Step 1 above) held in the general account. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting material information, including the possibility of fine or imprisonment for violations.

At login, the system also provides individuals with the standard EPA Security Banner:

In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following: 1) you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only; 2) unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action; 3) the term U.S. Government information system includes systems operated on behalf of the U.S. Government; 4) you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S. Government information systems; 5) at any time, the U.S. Government may for any lawful government purpose, without notice, monitor, intercept, search, and seize any authorized or unauthorized communication to or from U.S. Government information systems or information used or stored on U.S. Government information systems; 6) at any time, the U.S. Government may for any lawful government purpose, search and seize any authorized or unauthorized device, to include non-U.S. Government owned devices, that stores U.S. Government information; 7) any communications or information used, transmitted, or stored on U.S. Government information systems may be used or disclosed for any lawful government purpose, including but not limited to, administrative purposes, penetration testing, communication security monitoring, personnel misconduct measures, law enforcement, and counterintelligence inquiries; and 8) you may not process or store classified national security information on this computer system.

4.2 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?

Earle, Judy

From: Branch, Paula
Sent: Tuesday, August 21, 2018 10:42 AM
To: Aguilar, Marlyn; Earle, Judy
Cc: Dollison, Lawrence A.
Subject: FW: CAMDBS Privacy Impact Assessment
Attachments: CAMDBS PIA NPP Comments PLBranch Final 07202018.docx

Importance: High

Good morning Marlyn and Judy,

I'm forwarding again the final CAMDBS PIA. We have an ATO coming up and would really like to have this finalized.

Please do not hesitate to contact me if you have any questions or concerns.

Thank you in advance.

Paula L. Branch
US EPA (6204M)
Clean Air Markets Division
Voice (202) 343-9168
Fax (202) 343-2361

From: Branch, Paula
Sent: Friday, July 20, 2018 2:00 PM
To: Dollison, Lawrence A. <Dollison.Larry@epa.gov>
Subject: CAMDBS Privacy Impact Assessment
Importance: High

Larry,

It is done!

Please find attached the completed CAMDBS Privacy Impact Assessment.

I have incorporated all suggested edits as well as revisions to comments.

Let me know if you have any questions or concerns.

Thank you so much.

Paula L. Branch
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