

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 see [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.

• 80 FR 52271

• 80 FR 46271

• 80 FR 81251

• 80 FR 75706

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

• Part 75 of Volume 40 of the CFR

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

question?**1.1 What specific legal authorities and/or agreements permit
and define the collection of information by the system in****Section 1.0 Authorities and Other Requirements**

Users must be recognized as a designated representative (primary or alternate) or an agent of a CMSPs. 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 created and the user can register to use CBS and ECMPS on-line.

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

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

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

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

- 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**

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

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

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

Toxics (MATS), and NO_x SIP Call, and other CAA rules. Implementation of the Cross-State Air Pollution Rule (CSAPR), Mercury Air Acid Rain Program (ARP) and Title IV of the Clean Air Act Amendment of 1990. The Agency uses the information to determine compliance with Title V Acid

3.1 Describe how and why the system uses the information.

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

Section 3.0 Uses of the Information

Mitigation: The accuracy of the data is verified before acceptance. The ECMPs has a series of quality assurance checks that users must utilized before submission of the data

2.4 Privacy Impact Analysis: Related to Characterization of the Information

CAMDPS 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.

2.3 Discuss how accuracy of the data is ensured.

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

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.

Nitrogen Oxides Requirements

- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.
Allocation.
- (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 emission sulfide prior to the calendar year for which the allowance was allocated.
- (5) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to sulfur dioxide requirements prior to the calendar year for which the requirements under paragraph (1) of the Acid Rain program were deducted in order to comply with the requirements under paragraph (1) of the Acid Rain program.
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
- (ii) Starting on the later of January 1, 2000 or the deadline for monitoring certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitation for sulfur dioxide shall constitute a separate violation of the Act.
- (1) 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

Sulfur Dioxide Requirements

- The requirements of 40 CFR part 75 shall not affect the responsibility of the unit under other applicable 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.
- The emissions 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 source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- The owners and operators and, to the extent applicable, designee representative of each affected source read the Rules of Behavior, sign and submit the following

Monitoring Requirements

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

why not.

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

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)

their information?

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

information on this computer system.

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

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

I am authorized to make this submission on behalf of the persons with an ownership interest with respect to the Acid Rain Program, CSAPR NO_x Ozone Season Group 1, or 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 information submitted in this document and all its attachments is true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and statements and information are to the best of my knowledge and belief true, accurate, and individual with primary responsibility for obtaining the information, I certify that the information or omitting material information, including the possibility of fine or imprisonment for violations.

Most data collected by the CAMDBS is required. All required data is identified in the applications. Any information that is optional, is labeled accordingly. Individuals have the option of submitting information electronically or by paper form. Individuals have the opportunity to decline to provide the required information.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: Low – privacy risk of incomplete or inaccurate data

Mitigation: Individuals that do not certify are found not compliant. Noncompliance may lead to fines or imprisonment.

Section 5.0 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.

5.1 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?

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.

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

There are no other components to the assigned roles and responsibilities within the system.

5.3 Who (*internal and external parties*) will have access to the data/information in the system? If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)?

The internal and external parties with access to the data/information in the system include:

AGENCY:

EPA CAMD

5.4 What procedures are in place to determine which users may access the

For contractors the Federal Acquisition Regulation (FAR) clauses are included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act).

Allowanee Broker/Trader
Business Consultant
DASH Vendor
Legal Counsel
Plant/Company Management

INDUSTRY:

State/Local/Tribal

- Karen Vansickle: 202-343-9220
- Paula Branch: 202-343-9168

User names and passwords cannot be sent via email and must be given directly to the recipient.

4. Log into CBS and change your temporary password.

After receiving a user name and temporary password, you must log into CBS and change your temporary password. You must NOT share your user name and password with others. Please note that you must change your CBS password every 90 days. You will receive a reminder email, 30 days before your password expires. Your user name and password are the same for CBS and ECMPS.

5. Answer and maintain five challenge questions.

There is a list of 20 questions from which to select. These questions are similar to those you might see at a banking website and ask you for information only you should know. You may change your challenge questions and answers at any time, but you must always maintain at least five questions. If you do not select your challenge questions, you will not be able to submit data using CBS or ECMPS. CAMD cannot retrieve your challenge question answers for you.

6. Providing security information upon the submission of data.

Upon submission of data through CBS or ECMPS, you will have to enter your user name, password, and the answer to one randomly chosen challenge question. You will have three chances to enter this information correctly, or you will be locked out of the data systems.

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

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

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

5.6 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Disposition Authority Number N1-412-05-8e

Disposition Authority Number N1-412-05-8c

6.6 Privacy Impact Analyses: Related to Information Sharing

- Not Applicable. System of Records Notice (SORN) not required for the CAMDBS.
- 6.5 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. No disclosures outside of the Agency.

- 6.4 Describe how the system maintains a record of any disclosures outside of the Agency.

Not Applicable. System of Records Notice (SORN) not required for the CAMDBS.

- 6.3 Does the agreement place limitations on re-dissmination?

Not Applicable. System of Records Notice (SORN) not required for the CAMDBS.

- 6.1 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.
- State agencies and local government, have read-only access to data in the CAMDBS.
- 6.2 Describe how the external sharing noted in 6.1 is compatible with the original purposes of collection in the SORN noted in 3.4.

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 government, and third-party private sector entities.

Section 6.0 Information Sharing

Mitigation:

Privacy Risk: None, no privacy risks associated with records retention.

- 5.7 Privacy Impact Analyses: Related to Retention

Privacy Risk: None, no privacy risks associated with information sharing.

Mitigation:

Section 7.0 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.

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

CAMD Business System (CBS) login and edit of 'Your Profile'.

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

Upon entry to the system – the individual receives a screen detailing their name, business email, business address, business phone and fax information. The users can validate and update their information at this time. There are no time restrictions on access for correction of inaccurate and erroneous information

7.3 How does the system notify individuals about the procedures for correcting their information?

The individual receives a report detailing their name, email, business address, phone and fax information. Individuals are asked to review the report and either make any revisions themselves or report to the CBS help desk.

An excerpt of the notification is as follows:

Thank you for your recent on-line Certificate of Representation submission(s). The information has been updated in the CAMD Business System (CBS).

Please see the attached report(s) for details.

Please note this email contains an additional attachment along with the Certificate of Representation report.

The second attachment is a compressed gzip file included for purposes of the Cross-Media Electronic Reporting Rule (CROMERR). In order to ensure proper receipt of this email, EPA has renamed the file and changed the extension to "xml.epa". To view this file you must first rename the file and change the extension back to ".xml.gz". For more information on CROMERR, the file, and how to view its contents please see the

Privacy training is generally provided relevant to system collection in the form of Rules of Behavior. Each user must acknowledge and sign the Electronic Signature Agreement specifically relevant to the system/collection.

8.2 Describe what privacy training is provided to users either generally or

Audit able 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.

The data collected by the CAMDBS relates, almost exclusively, to facility profiles and submissions. This is subject to oversight and affected entity comment. To be collected is defined in the Agency's Information Collection Requests (ICR) to be necessary for administration programs mandated by the Clean Air Act. All data operations, as necessary for facility programs mandated by the Clean Air Act. All data submissions, as necessary for administrative programs mandated by the Clean Air Act. All data

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.

8.1 How does the system ensure that the information is used in accordance with stated practices in this PIA?

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

Section 8.0 Auditing and Accountability

Mitigation:

None, no privacy risks associated with redress.

7.4 Privacy Impact Analysis: Related to Redress

If you have any questions or concerns regarding the reconciliation results, please contact Kenon Smith at (202) 343-9164 or Paula Branch at (202) 343-9168.

The attached Allowance Deduction Report is your official confirmation of the total number of ARP allowances deducted for your facility for the 2017 compliance year, along with the serial numbers of the allowances retired from your account.

Following link:
<https://ecmps.camdsupport.com/faq/index.php?action=article&cat=4&id=5&startlang=en&highlight=email>

detailed below:

 **CAMD BUSINESS SYSTEM**
Electronic Signature Agreement

- I agree to maintain the security of the User ID and Password assigned to me by U.S. EPA for use of the CAMD Business System, in order to prevent disclosure of this information to anyone.
- I agree that, if I have any reason to believe that the security of the User ID or Password has been compromised, I will immediately inform U.S. EPA by calling (202) 343-9168.
- I agree to maintain an email account; if any email sent to me by U.S. EPA is returned as undeliverable, I will explain why this occurred when requested by U.S. EPA.
- I agree to notify U.S. EPA if I cease to represent the regulated entity specified below, by sending an email to irmc@epa.gov.
- I agree that I will be held as legally bound, obligated, and responsible for any submission I make using the CAMD Business System as I would be by making such submission in hardcopy form with my handwritten signature as certification.
- I agree that I will be held as legally bound, obligated, and responsible for any submission made using the CAMD Business System by an agent whom I have authorized to act on my behalf.

SIGNATURE:

PRINTED NAME:

TITLE:

COMPANY:

EMAIL ADDRESS:

DATE:

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk: None, no privacy risks associated with auditing and accountability.

Mitigation:

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
CAMD, ISO
US EPA (6204M)
Clean Air Markets Division
Voice (202) 343-9168
Fax (202) 343-2361

