



# Air Pollution Control Division Electronic Reporting Policy

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## Summary

In keeping with advancements in data availability and record keeping, the Air Pollution Control Division (Division) is transitioning to a paperless records system. Stakeholders are currently required to submit numerous documents to the Division and the Environmental Protection Agency (EPA). This policy addresses what documents can be submitted electronically, how to submit the electronic documents, and how to handle document submittals which are required by both the EPA and the Division.

Currently this policy only applies to documents submitted to the Compliance and Enforcement (CEP) & Stationary Sources (SSP) Programs of the Division.

This policy supersedes the "40 CFR Part 60/63 (NSPS/MACT) Electronic Reporting Policy".

## Background and Purpose

EPA regulations codified in 40 CFR Part 60 and 63 (Part 60 and Part 63, also known as NSPS and NESHAP/MACT, respectively) require affected sources to perform emissions source tests, conduct continuous emissions monitoring, and submit compliance and emissions reports. EPA has promulgated and continues to promulgate "E-Reporting" rules requiring affected sources to electronically submit performance test results, emissions monitoring data, compliance reports, and emissions reports for purposes of complying with Part 60 and Part 63 regulations.

As a result, EPA developed the Compliance and Emissions Data Reporting Interface (CEDRI), located on EPA's [Central Data Exchange \(CDX\)](#) and the Emissions Collection and Monitoring Plan System (ECMPS). CDX Web is the application used by EPA programs and various stakeholders to manage environmental data submitted to meet the electronic reporting requirements.

The CEDRI program service supports the submittal of three types of reporting:

- **Performance Test (Stack Test) and Continuous Emission Monitoring Systems (CEMS) Reports** - Stack tests and CEMS Reports are entered into EPA's [Electronic Reporting Tool \(ERT\)](#) which generates emission data files. Sources upload these files to CDX using CEDRI.
- **Notification Reports** - A Notification Report or Notification of Compliance Status (NOCS) are reports typically submitted by a regulated facility to notify the designated authority that the facility has achieved compliance with an applicable regulation. (Most Notification Reports are uploaded to CEDRI as Adobe Portable Documents - PDFs)
- **Air Emissions Reports** - Air emissions reports are periodic reports submitted to the delegated authority after the facility achieves initial compliance, or demonstrates continuous compliance with an applicable regulation over the reporting period (e.g., 6 months). These reports are identified by each specific rule.

As the Administrator, the Division is delegated authority by the EPA to monitor compliance with and enforce federal rules which have been adopted into Air Quality Control Commission Regulations. This policy defines which reports must be submitted to the Division in addition to CDX.

***This policy document does not, in any way, preclude an affected source from complying with any reporting requirements (or any other requirements) set by an applicable subpart of 40 CFR Part 60 or 63.***

***Note that this policy pertains to reports which must be submitted electronically to CDX pursuant to the requirements of an applicable Part 60 or Part 63 regulation, and reports which are required by the Division (either in addition to, or separate from an EPA requirement).***

## **Policy**

In the interest of reducing duplicate report submissions, and the environmental impacts of printed documents, the Division will accept the following reports and documents electronically. The table below specifies the documents and reports that will be accepted electronically by the Division and the submittal pathway.

The Division requires the documents indicated below as separate submittals (beyond the submittal to EPA via CEDRI) because the subject documents typically contain more information than is required by a Part 60/Part 63 subpart and are used for multiple purposes within the Division. Division use includes but is not limited to: permitting (Operating or Construction Permit requirements), compliance determinations and/or demonstrations, and emission inventory and modeling.

<b>Type of Report</b>	<b>Submittal Guidance</b>
<p>40 CFR §60.7(c) Excess Emissions and Monitor Downtime Reports (EERs) and State-Only EERs</p> <p>Submittal Format: Either of the following</p> <p style="padding-left: 40px;"><b>Paper Copy</b> (<i>until July 1, 2017</i>)</p> <p style="padding-left: 40px;"><b>Electronic</b> (<i>beginning February 1, 2017</i>)</p>	<p><b>Beginning February 1, 2017</b>, these reports should be submitted to the Division by email<sup>1</sup> at <a href="mailto:CDPHE_APCD_compliancetesting@state.co.us">CDPHE_APCD_compliancetesting@state.co.us</a>.</p> <p><b>Beginning July 1, 2017</b>, EERs will no longer be accepted in paper format and must be submitted via email (as indicated above).</p>
<p>Stack Test Protocols and CEMS Performance Evaluations Protocols (collectively referred to as test protocols)</p> <p>Submittal Format: Either of the following</p> <p style="padding-left: 40px;"><b>Paper Copy</b> (<i>until July 1, 2017</i>)</p> <p style="padding-left: 40px;"><b>Electronic</b> (<i>currently available</i>)</p>	<p>Currently, test protocols can be submitted to the Division in paper format or by email at <a href="mailto:CDPHE_APCD_compliancetesting@state.co.us">CDPHE_APCD_compliancetesting@state.co.us</a>.</p> <p><b>Beginning July 1, 2017</b>, test protocols will no longer be accepted in paper format and must be submitted via email (as indicated above).</p>

<sup>1</sup> The Division's email capacity for reports of this nature is 20 MB. If a report is too large for email, it can be submitted in multiple parts (AIRS Point ID), or if necessary the Division will provide the information required to submit the report via the APCD Compliance Testing Electronic Drive.

Type of Report	Submittal Guidance
<p>Stack Test Reports and CEMS Performance Evaluations. i.e. Relative Accuracy Test Audits (RATA) and Certification Applications</p> <p>Submittal Format: Either of the following</p> <p style="padding-left: 40px;"><b>Paper Copy</b> (<i>until July 1, 2017</i>)</p> <p style="padding-left: 40px;"><b>Electronic</b> (<i>beginning February 1, 2017</i>)</p>	<p><b>Beginning February 1, 2017</b>, these reports should be submitted to the Division by email<sup>1</sup> at <a href="mailto:CDPHE_APCD_compliancetesting@state.co.us">CDPHE_APCD_compliancetesting@state.co.us</a>.</p> <p><b>Beginning July 1, 2017</b>, test reports will no longer be accepted in paper format and must be submitted via email (as indicated above).</p>
<p>Landfill Tier 2, Tier 3, and Tier 4 protocols and reports</p> <p>Submittal Format: Either of the following</p> <p style="padding-left: 40px;"><b>Paper Copy</b> (<i>until July 1, 2017</i>)</p> <p style="padding-left: 40px;"><b>Electronic</b> (<i>beginning February 1, 2017</i>)</p>	<p>Tier 2/3/4 Protocols and Reports are considered Stack Tests and must be submitted as indicated in the Stack Test protocol/report sections above.</p>
<p>Landfill Gas Collection and Control System (GCCS) Design Plans</p> <p>Submittal Format:</p> <p style="padding-left: 40px;"><b>Paper Copy Only</b></p>	<p><b>GCCS Design Plans are an exception to this policy and <u>must be submitted in paper copy</u>, until further notice.</b></p>

Reports submitted to CDX via CEDRI or ECMPS that do not fall into the reporting categories shown in the table above (such as initial notifications of applicability and notifications of compliance status) do not require a separate submittal to the Division (in paper or electronic form). The Division will utilize the information submitted in CEDRI via the State Reviewer process to minimize redundant reporting requirements.

Documents which are only submitted to the Division and are not specifically addressed in this policy should follow the most recent Division-approved submission procedures. Submittal of documents with an alternative approved procedure shall continue in the manner specified.

### **Retention and Availability**

1. Reports described in the table above and any supplemental materials submitted in paper, or electronic format will be retained as prescribed by the Division's retention schedules.
2. Reports described in the table above and supplemental materials are considered and will be treated as a public record.
3. All reports submitted only to CDX are made available to the public via [WebFIRE](#) 60 days after submittal.

## **Revision History**

Jan 2017 - Included changes to address State-only submissions, EERs, landfill reporting requirements, expanded the scope of the policy beyond just 40 CFR Part 60/63 reporting, changed the policy title to "Air Pollution Control Division Electronic Reporting Policy", and included clarification on what documents are affected (only those submitted to CEP & SSP).

Aug 2016 - Original policy "40 CFR Part 60/63 (NSPS/MACT) Electronic Reporting Policy" approved and effective (August 1, 2016).

## **References**

Central Data Exchange

<https://cdx.epa.gov/>

Electronic Reporting Tool

<https://www3.epa.gov/ttnchie1/ert/>

40 CFR Part 60, Subpart A - General Provisions

[http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr60\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr60_main_02.tpl)

40 CFR Part 63, Subpart A - General Provisions

[http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr63\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr63_main_02.tpl)

Retention schedules

<https://www.colorado.gov/pacific/archives/state-agency-records-management>

WebFIRE

<https://cfpub.epa.gov/webfire/>