



June 29, 2020

MEMORANDUM

Subject: Electronic Reporting Guidance for National Emission Standards for Hazardous Air Pollutants (NESHAP) Reporting Through the Environmental Protection Agency's (EPA) Compliance and Emissions Data Reporting Interface (CEDRI)

Approved by: Heinz Kaiser, Division Director, Emissions and Evaluation Support

Summary:

In keeping with advancements in data availability and recordkeeping, the Air Toxics Section of the Bureau of Air Quality of the South Carolina Department of Health and Environmental Control is transitioning to a paperless records system for some NESHAP reporting. Stakeholders are required to submit numerous reports and notifications to the Department and the EPA. This guidance addresses which NESHAP documents can be submitted electronically, how to submit the documents, and how to handle the document submittals that are required by both the EPA and the Department.

Background and Purpose:

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

As a result, the EPA developed the CEDRI system, located on the 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 multiple types of reports:

- Performance 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.

- Notifications – Initial Notifications, Notifications of Compliance Status, and other notifications are typically submitted by regulated facilities to notify the EPA or the Department that the facility has become subject to, achieved compliance with, or changed compliance options with an applicable NESHAP regulation. Most notifications are uploaded to CEDRI as Adobe Portable Document Format (PDF) files.
- Air emission reports – Air emission reports are submitted to the EPA and the Department after the facility achieves initial compliance and to report the continuous compliance status with an applicable regulation on a periodic basis (i.e. quarterly, semiannually, annually, etc.). These types of reports and reporting periods are identified by each specific rule.

As the administrator, the Department is delegated authority by the EPA to monitor compliance with and enforce federal rules that have been adopted into South Carolina's Air Regulations and Standards. This guidance defines which NESHAP/MACT reports must be submitted to the Department and/or CDX.

This guidance 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 63.

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

Guidance:

In the interest of reducing duplicate report and notification submissions and the environmental impacts of printed documents, the Department will accept the following reports and notifications electronically. The table below and Table 1 of Appendix A to this document specify the reports and notifications that will be accepted electronically by the Department and the submittal pathway.

The Department requires the reports and notifications indicated in the table below and in Table 1 of Appendix A as **separate submittals** (beyond the submittal to EPA via CEDRI) because the subject reports and notifications typically contain more information than is required by a subpart within Part 63 and are used for multiple purposes within the Department. Department use includes, but is not limited to, permitting (operating or construction permit requirements), compliance determinations and/or demonstrations and emission inventory and modeling

Type of Submission	Submittal Guidance
<p>NESHAP/MACT Performance Test Reports and CEMS Performance Evaluations (i.e. Relative Accuracy Test Audits (RATA) and Certification Applications)</p> <p>Submittal Format: Paper copy only</p>	<p>Although the EPA requires some performance test reports and CEMS performance evaluations to be submitted using CEDRI located on CDX for specific NESHAP/MACT subparts, the Department also requires all final source test reports to be submitted in a written format as per SC Regulation 61-62.1, Section IV(F)(1).</p> <p>Performance test reports and CEMS performance evaluations are not accepted in electronic format by the Department and must be submitted to the Department in a written format.</p>
<p>NESHAP/MACT Reports and Notifications for Regulations Specified in Table 1 of Appendix A to this Document</p> <p>Submittal Format: Electronic</p>	<p>These reports can be submitted using CEDRI located on CDX. Each NESHAP/MACT subpart has different requirements for what types of reports and notifications are to be submitted via CEDRI. Facilities should follow the specific requirements described in each subpart. For reports that are submitted using CEDRI, a separate copy does not need to be submitted to the Department for these subparts. The Department will utilize the information submitted in CEDRI via the state reviewer process to minimize redundant reporting requirements.</p>

Reports and notifications submitted to CDX via CEDRI for NESHAP/MACT regulations listed in Table 1 of Appendix A to this document will be utilized by the Department via the state reviewer process to minimize redundant reporting requirements. Reports and notifications that are only submitted to the Department and are not specifically addressed in this guidance should follow the most recent Department-approved submission procedures. Submittal of reports and notifications with an alternative approved procedure shall continue in the manner specified.

Retention and Availability:

- 1) Reports and notifications described in the table above for NESHAP/MACT regulations listed in Table 1 of Appendix A and any supplemental materials submitted in paper or electronic format will be retained as prescribed by the Department's retention schedules.
- 2) Reports described in the table above for NESHAP/MACT regulations listed in Table 1 of Appendix A and supplemental materials are considered and will be treated as public records.
- 3) Confidential Business Information (CBI) should not be submitted to CEDRI. For reports and notifications containing CBI, reports and notifications can be submitted via CEDRI with CBI omitted but a hard copy of the complete report or notification, including all information claimed to be CBI, must be submitted to the Department. Any report or notification containing CBI will be handled according to the Department's confidentiality policy.
- 4) All reports submitted to CDX are made available to the public by EPA via WebFIRE 60 days after submittal.

Reference Websites

Central Data Exchange

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

WebFire

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

EPA CEDRI Information Website

<https://www.epa.gov/electronic-reporting-air-emissions/cedri>

Appendix A

Table 1 - NESHAP/MACT Regulations for which Electronic Reporting through CEDRI is now allowed

NESHAP/MACT Subpart	Rule Name
AAAAA	Lime Manufacturing Plants
DDDDD	Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources
EEEEEE	Iron and Steel Foundries (Major Sources)
JJJJJJ	Industrial, Commercial, and Institutional Boilers at Area Sources
KKKK	Surface Coating of Metal Cans
LLL	Portland Cement Manufacturing Industry
LLLLL	Asphalt Processing and Asphalt Roofing Manufacturing
MM	Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills
NNNN	Surface Coating of Large Appliances
OOOO	Printing, Coating, and Dyeing of Fabrics and Other Textiles
PPPPP	Engine Test Cells/Stands
QQQQ	Surface Coating of Wood Building Products
RRRR	Surface Coating of Metal Furniture
UUUUU	Coal- and Oil-Fired Electric Utility Steam Generating Units
VVV	Publicly Owned Treatment Works

VVVV	Boat Manufacturing
WWWW	Reinforced Plastic Composites Production
XXXX	Rubber Tire Manufacturing
YYYY	Stationary Combustion Turbines
ZZZZ	Stationary Reciprocating Internal Combustion Engines
ZZZZZZ	Iron and Steel Foundries (Area Sources)

Note: Please review this table frequently as new NESHAP/MACT regulations are incorporating CEDRI reporting

Contacts

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Revision History:

Date	Modified By	Modifications
April 2, 2020	Bryan Nichols	Original guidance
May 21, 2020	Bryan Nichols	VVVV and WWWW added to Table 1
June 29, 2020	Bryan Nichols	AAAAA, EEEEE, KKKK, XXXX, and ZZZZZ added to Table 1