



**Marathon
Petroleum Corporation**

Air Permitting, Regulations & Compliance – Major Federal Developments

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Topics

- Supreme Court decision in *West Virginia v. EPA*
- Legal and regulatory developments in Cross-State Air Pollution Rule
- Midwest Governors' request to eliminate the one-pound RVP waiver

West Virginia v. EPA

What is it?

- Supreme Court decision in which Court held that EPA exceeded its statutory authority when requiring “generation-shifting” in the power sector to comply with Section 111(d) of the Clean Air Act.

What does it mean for EPA regulation of CO₂ from power plants?

- It means that EPA cannot require power companies to replace coal power plants with cleaner plants. Court, however, did not decide whether EPA must limit application of Section 111(d) standards to the source.

Why is it important to non-power plant sectors?

- Court defined the Majors Questions doctrine in its decision. This doctrine could limit agencies’ ability to promulgate novel and far-reaching regulations.

West Virginia v. EPA

Background

- In 2009, EPA issued endangerment finding for CO₂.
- In 2015, EPA issued the Clean Power Plan, regulating CO₂ from existing power plants under Section 111(d).
 - EPA identified performance standards for the regulated power plants with reference to the “best system of emission reduction” (BSER).
 - EPA determined the BSER by looking at the power sector as a kind of “system,” in which the sector could achieve reductions by shifting generation from high-emitting plants to lower- or zero-emitting plants.
- The Clean Power Plan never went into effect.
- In 2019, the Trump Administration repealed the Clean Power Plan and replaced it with the Affordable Clean Energy Rule (ACE Rule).
 - ACE Rule focused regulation within the fenceline of the power plant.
- The ACE Rule was challenged and vacated by the D.C. Circuit Court.

West Virginia v. EPA

Major Questions doctrine

- Supreme Court held that EPA had exceeded its authority in requiring generation-shifting in the Clean Power Plan.
- Holding was based on the Major Questions doctrine: Is the agency's action of such economic and political significance that clear congressional authorization is required?
 - Section 111(d) is a rarely used statute.
 - Statute has previously been applied at the pollution source, not used to create a “system” of replacing “dirty” plants with “clean” plants.
 - Congress did not delegate to EPA the authority to decide how much coal-based generation should be in the U.S. electrical grid.
 - Congress had already considered and rejected numerous carbon cap-and-trade bills.

West Virginia v. EPA

Potential ramifications of the decision

- The decision guides EPA's changes to the power plant CO₂ regulations.
 - Case did not decide whether statute exclusively requires regulation at the source – leaves the door open for other options.
- The decision could impact other EPA rulemaking.
 - For example, EPA's attempts to mandate electric vehicles or to grant a waiver to California allowing it to eliminate internal combustion engine cars may implicate the Major Questions doctrine.
- The decision could impact other agency rulemaking.
 - Raises question regarding SEC's authority to require climate disclosures.
 - Also raises questions regarding government's proposed rule requiring federal contractors to report GHG emissions and set science-based targets.

Midwest Ozone Group v. EPA

Challenge to the Cross State Air Pollution Rule (CSAPR)

- Midwest Ozone Group (MOG) challenged the validity of the CSAPR for the 2008 Ozone NAAQS.
 - EPA undertook a four-step process to develop a federal implementation plan for the upwind states.
 - MOG challenged three of the four steps.
- Court upheld the rule, giving EPA “great deference” in its decisions during the four-step review.
- EPA has just issued its expanded CSAPR to address the 2015 ozone NAAQS (following slides).
 - The expanded CSAPR raises novel issues that were not part of this lawsuit, but this lawsuit could provide EPA with precedent on the deference given to its modeling decisions.

CSAPR for 2015 Ozone NAAQS

Industrial sources and states covered

■ Industrial sources:

- Reciprocating internal combustion engines in pipeline transportation of natural gas;
- Kilns in cement and cement product manufacturing;
- Reheat furnaces in iron and steel mills and ferroalloy manufacturing;
- Furnaces in glass and glass product manufacturing;
- Boilers in iron and steel mills and ferroalloy manufacturing, metal ore mining, basic chemical manufacturing, petroleum and coal products manufacturing, and pulp, paper, and paperboard mills; and
- Combustors and incinerators in solid waste combustors and incinerators

■ Non-EGU provisions apply in these states:

- Arkansas, California, Illinois, **Indiana**, **Kentucky**, Louisiana, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, New York, **Ohio**, Oklahoma, Pennsylvania, Texas, Utah, Virginia, and West Virginia.

Non-EGU Industry NOx Standards

Estimated projects and boiler limits

Estimated Non-EGU Control Installations¹

State	SCR / SNCR	Other NOx Controls	Total
Indiana	12	41	53
Kentucky	2	46	48
Ohio	14	96	110

NOx Emission Limits for Non-EGU Affected Industry Boilers

Unit type	Emissions limit (lb NOx/MMBtu)
Coal	0.20
Residual oil	0.20
Distillate oil	0.12
Natural gas	0.08

¹ NOx Emission Control Technology Installation Timing for Non-EGU Sources, SC&A, Inc., March 14, 2023, https://www.epa.gov/system/files/documents/2023-03/NOx%20Control%20Installation%20Timing_FinalReport_GoodNeighborFinalRule.pdf

Midwest Governors' Request

Elimination of one-pound RVP waiver for E10

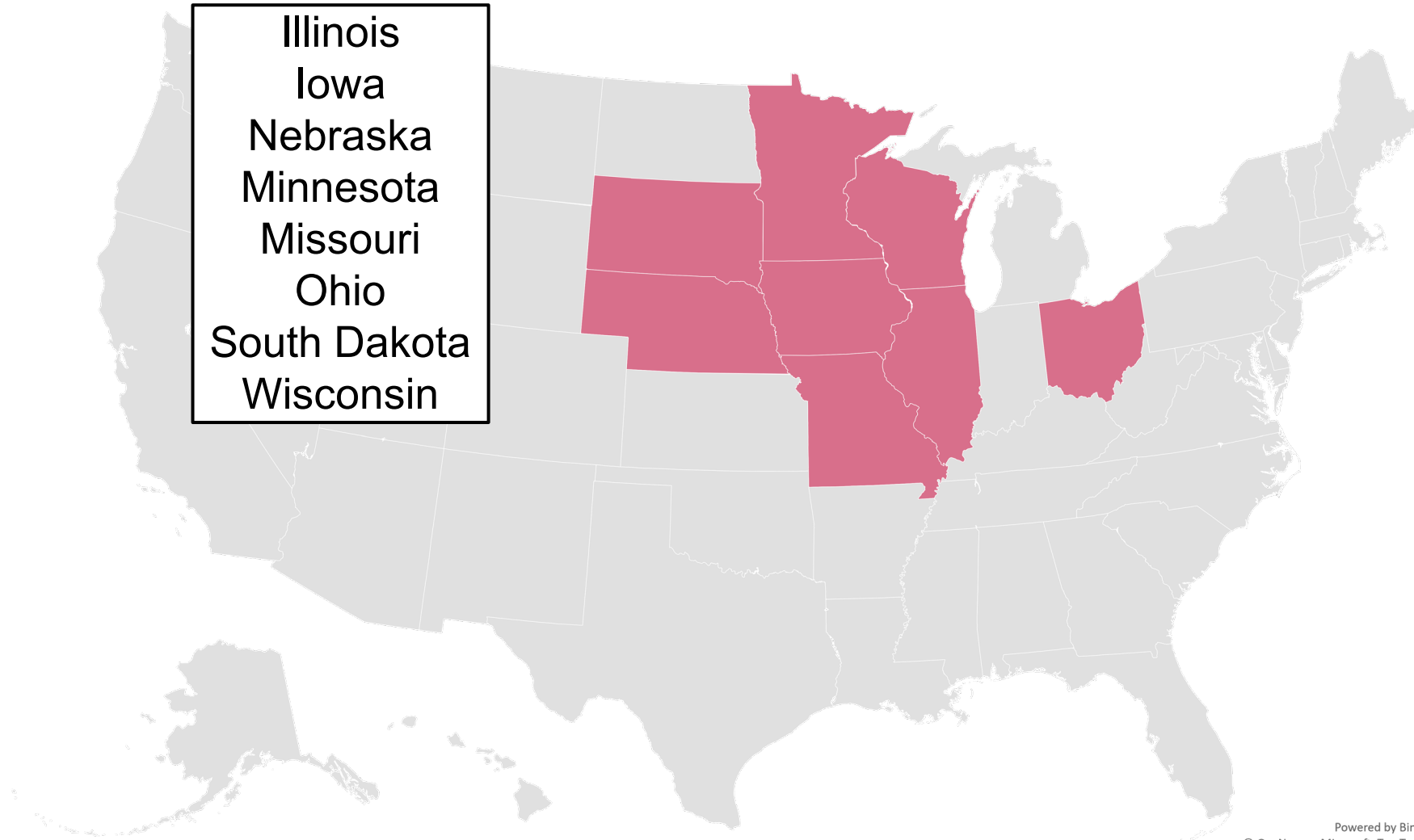
- Eight state governors requested EPA promulgate regulations removing the one-pound Reid Vapor Pressure (RVP) waiver for gasoline-ethanol blends containing 10 percent ethanol (E10).
 - Today, base gasoline must meet 9.0 psi RVP¹ during the summer ozone season.
 - Blending 10% ethanol increases the RVP, so law increases standard to 10.0 psi RVP for E10.
 - E15 does not qualify for the 1.0 psi RVP waiver.
- Legislative change would create parity between E10 and E15 nationwide.
- EPA has delayed implementation of the rule to the 2024 summer ozone season due to supply concerns that would be created if rule were effective during 2023 summer ozone season.



¹RVP may be lower in nonattainment areas.

Midwest Governors' Request

States covered



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Workshop B – Major Federal Air Developments

March 28, 2023 (9:45 AM – 11:00 AM)

DJ Wheeler – Managing Consultant



Topics – Federal Regulatory Developments

- ▶ Good Neighbor implementation schedule
- ▶ Boiler MACT revisions
- ▶ Proposed RY2023 GHG reporting revisions
- ▶ Proposed reconsideration of fugitive emissions under major NSR
- ▶ Proposed PM2.5 NAAQS reductions
- ▶ Recent risk and technology reviews
- ▶ CEDRI and electronic reporting

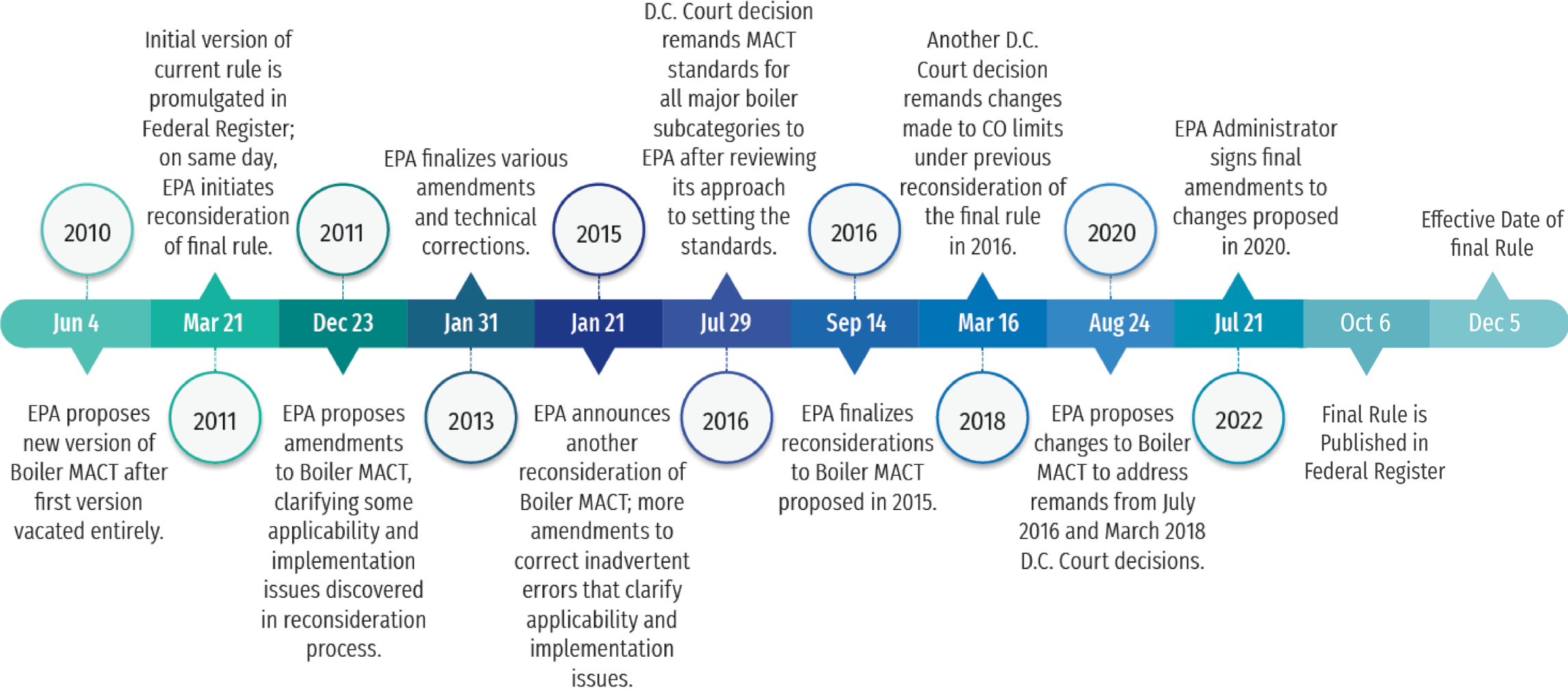
Good Neighbor Implementation Schedule

- ▶ Federal Implementation Plan
 - 2023 ozone season: EGUs in 7 states added to Group 3 trading program
 - 2024 ozone season: back-stop limits applied to EGUs
 - 2026 ozone season: emission limits applied to non-EGUs
- ▶ State Implementation Plan (Optional)
 - 9/1/23: deadline for SIP revision to modify 2024 EGU allocations
 - 12/1/23: deadline for SIP revision to modify 2025 EGU allocations
 - 12/1/24: deadline for SIP revision to modify 2026+ EGU allocations
 - No formal schedule for SIPs to replace FIP for non-EGUs

Boiler MACT Basics

- ▶ Major Source Boiler Maximum Achievable Control Technology Rule (40 CFR 63 Subpart DDDDD; the “Boiler MACT”)
- ▶ The Boiler MACT regulates emissions of Hazardous Air Pollutants (HAP) from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP.
- ▶ This rule establishes emissions standards for particulate matter (PM) with total selected metals (TSM) as an alternative to the PM standard, carbon monoxide (CO), hydrogen chloride (HCl), and mercury (Hg).
- ▶ There are no emissions standards under the rule for natural gas-fired (gas 1) units.
- ▶ The emissions standards differ based upon on the subcategories that apply to a boiler under the rule.

Timeline Revisions to Current Boiler MACT Rule





Boiler MACT Updates

- ▶ Final Amendments to Boiler MACT
 - Signed July 21, 2022
 - Based on changes proposed in 2020
 - Amending 34 emission standards for several categories of boilers (New and Existing)
 - Summary of updated categories and reduced limits provided in tables in next few slides
 - 28 limits become more stringent compared to existing limits
 - 6 become less stringent

Table 1. Summary of Subcategories with Revised Emission Limits

Subcategory	Pollutant
New – Solid Fuel	HCl
New – Dry Biomass Stoker/Sloped Grate	TSM*
New – Biomass Fluidized Bed	CO, PM, TSM
New – Biomass Suspension Burner	CO, TSM*
New – Biomass Hybrid Suspension Grate	CO
New – Biomass Dutch Oven/Pile Burner	PM
New – Biomass Fuel Cell	PM
New – Wet Biomass Stoker/Sloped Grate	CO, PM
New – Liquid Fuel	HCl
New – Heavy Liquid Fuel	PM, TSM
New – Process Gas	PM*
Existing – Solid Fuel	HCl, Hg
Existing – Coal	PM
Existing – Coal Stoker	CO
Existing – Dry Biomass Stoker/Sloped Grate	TSM*
Existing – Wet Biomass Stoker/Sloped Grate	CO, PM, TSM
Existing – Biomass Fluidized Bed	CO, PM, TSM
Existing – Biomass Suspension Burner	PM, TSM*
Existing – Biomass Dutch Oven/Pile Burner	PM
Existing – Liquid Fuel	Hg
Existing – Heavy Liquid Fuel	PM
Existing – Non-continental Liquid Fuel	PM
Existing – Process Gas	PM*

**Indicates a less stringent limit compared to the previously promulgated emission limits.*

Table 2: Limits Reduced Since 2020 Proposed Amendments

Subcategory	Pollutant*	Previous Emission Limit	Proposed Emission Limit	Final Emission Limit	Emission Limit Units (3-hour Average)	Percent Change in Limit
NEW Units in all subcategories designed to burn solid fuel	HCI	2.2E-02	3.0E-04	2.1E-04	lb/MMBtu of Heat Input	-99%
		2.5E-02	4.1E-04	2.9E-04	lb/MMBtu of Steam Input	-99%
		0.28	3.9E-03	2.7E-03	lb/MWh	-99%
NEW Units designed to burn liquid fuel	HCI	4.4E-04	7.0E-05	1.5E-04	lb/MMBtu of Heat Input	-66%
		4.8E-04	7.7E-05	1.7E-04	lb/MMBtu of Steam Input	-65%
		6.1E-03	9.7E-04	2.1E-03	lb/MWh	-66%
EXISTING Fluidized bed units designed to burn biomass/bio-based solid	PM	0.11	2.1E-02	7.4E-03	lb/MMBtu of Heat Input	-93%
		0.14	2.6E-02	9.2E-03	lb/MMBtu of Steam Input	-93%
		1.6	0.30	0.11	lb/MWh	-93%

**Facilities have the option of complying with the heat input-based limits (lb/MMBtu of Heat Input) or the alternative output-based limits (lb/MMBtu of Steam Output or lb/MWh).*

Boiler MACT Updates- How to Prepare

► Final Amendments to Boiler MACT

- Facilities have three years from FR publication date (10/6/2022) to demonstrate compliance with the revised emission standards.

Suggested action items:

- ◆ Determine whether your boiler is in a subcategory with revised emissions standards
- ◆ Assess available emissions data from past performance tests and fuel analyses against the updated limits
- ◆ Evaluate how the changes will impact your facility's overall compliance strategy and/or operating limits
- ◆ Consider necessary permitting requirements
- ◆ Review needs for updating facility compliance plans
- ◆ Begin planning for future compliance demonstrations

June 2022 Proposed Amendments to GHG MRR Reports

- ▶ The proposed amendments would affect **RY2023 reports (due in 2024)**. Changes can be categorized by three types:
 - Amendments to existing calculation and monitoring methods.
 - Amendments that require reporting of additional data.
 - Amendments that streamline requirements and improve implementation.
- ▶ Affects Subpart A (General Provisions) and 22 individual Subparts, including Subpart C (General Stationary Fuel Combustion Sources)
- ▶ Additional revisions proposed for **increasing transparency associated with carbon capture, utilization, and sequestration activities** to better align with other federal initiatives under the Biden Administration

Proposed Reconsideration of Fugitive Emissions Rule

- ▶ 10/14/2022: EPA proposed changes to NSR regulations related to how “fugitive emissions” are treated when determining whether a physical or operational change at an industrial facility is a “major modification.”
- ▶ A 2008 rule required owners/operators of facilities only in specific industrial source categories listed in the regulations to include fugitive emissions when determining whether a change was a major modification.
 - These types of source categories include petroleum refineries, large fossil fuel-fired steam electric plants, and Portland cement plants, among others.
 - Facilities in all other industrial source categories *were not required* to count fugitive emissions towards the major modification thresholds.





Proposed Reconsideration of Fugitive Emissions Rule

- ▶ EPA is proposing to reconsider, and to repeal, the 2008 rule.
- ▶ The proposed rule would require *all existing major stationary sources* to count fugitive emissions toward the emissions total used to determine whether a change at the source constitutes a “major modification” and would be subject to major NSR permitting requirements.

Particulate Matter NAAQS

- ▶ **First issued in 1971:** Revised in 1987, 1997, 2006 and 2012
- ▶ **Current Standard (2012):** 12.0 $\mu\text{g}/\text{m}^3$ $\text{PM}_{2.5}$ (Annual), 35 $\mu\text{g}/\text{m}^3$ $\text{PM}_{2.5}$ (24-hr)
- ▶ **Revision Process:**
 - “thorough review” of NAAQS by EPA
 - Review by independent Clean Air Scientific Advisory Committee (CASAC) on same five-year cycle
- ▶ **2020 Review:**
 - Lack of consensus on whether to revise 2012 (Annual) standard
 - Final decision to retain the 2012 standard with no changes

Particulate Matter NAAQS

► Reconsideration of 2020 Review (2021):

- **Jun. 2021:** EPA grants reconsideration of 2020 decision.
- **Oct. 2021:** CASAC majority recommends reducing standards to 8-10 $\mu\text{g}/\text{m}^3$ PM_{2.5} (annual). (Many areas do not meet this)
- **January 6, 2023: EPA Proposed action on PM standards (Prepublication)**
 - ◆ 60 days to comment from date of publication in FR
 - ◆ Primary Annual PM_{2.5} (current standard is 12 $\mu\text{g}/\text{m}^3$)
 - Proposed lowering to 9-10 $\mu\text{g}/\text{m}^3$ and gathering comments on 8-11 $\mu\text{g}/\text{m}^3$
 - ◆ Primary and Secondary 24-HR PM_{2.5} (current standard is 35 $\mu\text{g}/\text{m}^3$)
 - Retain current standard and gathering comments on reducing it to 25 $\mu\text{g}/\text{m}^3$
 - ◆ Secondary Annual PM_{2.5} (current standard is 15 $\mu\text{g}/\text{m}^3$), Primary/Secondary 24-HR PM₁₀ (current standard is 150 $\mu\text{g}/\text{m}^3$)
 - Retain current standard

Particulate Matter NAAQS

- ▶ **What happens when EPA lowers a NAAQS standard?**
 - **Area Designations:** EPA gathers monitoring data; makes area designations.
 - **Control Strategy:** States with Nonattainment Areas revise their SIPs to require reductions from stationary sources.
 - **Nonattainment NSR:** Major sources thresholds are reduced, and major sources will be required to obtain offsets for new construction/ major modifications; lowest achievable emission rate (LAER).

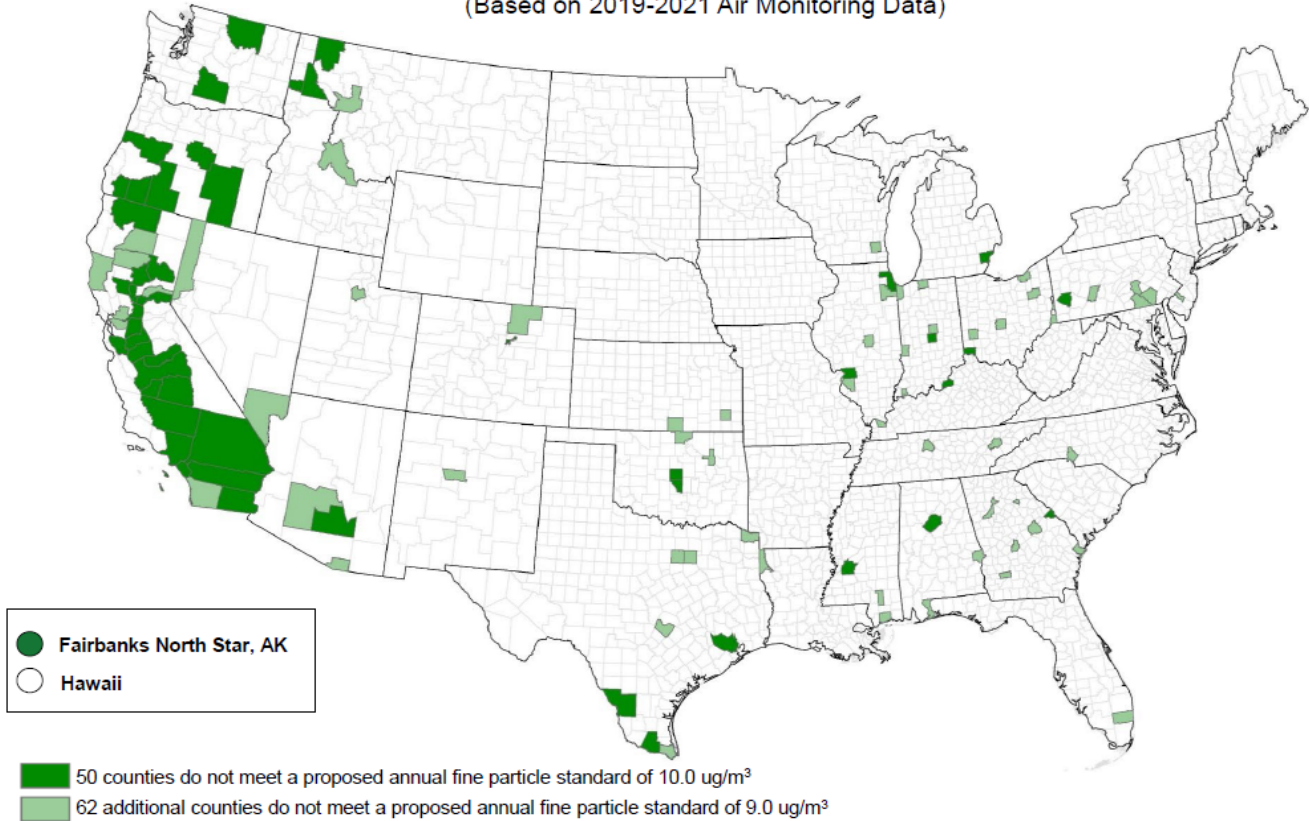
So, We've Got a Proposal...

- ▶ When will any final revised PM_{2.5} NAAQS become effective?
 - Could be ~9 months from proposal – conceivable for 4th quarter 2023, or maybe even 3rd quarter?
 - NAAQS issued as “final” in Federal Register, and typically “effective” 60 days after publication
 - The effective date of any revised PM_{2.5} NAAQS, will become a critical date for any ongoing/planned facility permitting efforts, so keep close tabs on this!

Current Monitoring Data, 2019-2021 Design Data

Current Air Monitoring Data Show Some Counties Would Not Meet Proposed Primary Fine Particle Standards

(Based on 2019-2021 Air Monitoring Data)



- Fairbanks North Star, AK
- Hawaii

- 50 counties do not meet a proposed annual fine particle standard of 10.0 ug/m³
- 62 additional counties do not meet a proposed annual fine particle standard of 9.0 ug/m³

Note: Map reflects monitored counties with complete monitoring data. See accompanying table for more detail. Future area designations (attainment/nonattainment) will not be based on these data, but likely on monitoring data collected between 2021 and 2024. Of the 112 counties with 2019-2021 design values above 9 ug/m³, 24 counties are totally or partially contained in nonattainment areas for the current PM_{2.5} standards.

This information is provided for illustrative purposes only and is not intended to project or predict the outcome of any forthcoming designations process.

So How Does this Affect Modeling for Permitting?

- ▶ Two main potential pathways, each with differing challenges
 - New Source Review/PSD permitting exercises
 - ◆ PSD permit applications in progress/submitted “soon”
 - ◆ PSD permit extensions
 - State/permitting authority driven minor source permit modeling requirements
- ▶ PSD procedures/timing considerations well defined – minor source permit modeling requirements could be very case-by-case
- ▶ Coordination with permitting authority contacts regarding minor source permitting requirements will be important, as well as PSD considerations

Primary PSD Permitting Based Implications (1 of 3)

- ▶ How will this rulemaking impact current/near term PSD permitting actions?
 - No grandfathering provisions (pg. 455 of pre-publication version)
 - This means any PSD permit not **final** on the effective date of the NAAQS, is required to evaluate compliance with the NAAQS
 - ◆ No draft permit, no submitted application by date, no grandfathering of any kind – permit must be “final” before the effective date of the revised NAAQS
 - So, if you submit a PSD application showing $PM_{2.5}$ impacts of $10.4 \mu\text{g}/\text{m}^3$, and the NAAQS becomes final/effective at $10 \mu\text{g}/\text{m}^3$ prior to final permit issuance, the permitting authority cannot issue the permit until a complaint modeling demonstration at a level of $10 \mu\text{g}/\text{m}^3$ is provided
 - ◆ A significant risk factor for PSD applications/review in progress

Primary PSD Permitting Based Implications (2 of 3)

2019).²⁰⁰ Based on that court decision, the EPA is not proposing any grandfathering provision for this proposed PM_{2.5} NAAQS revision, if finalized. Accordingly, PSD permits issued on or after the effective date of any final revised PM_{2.5} NAAQS would require a demonstration that the proposed emissions increases would not cause or contribute to a violation of the revised PM_{2.5} NAAQS.

From January 27, 2023 Federal Register notice for the proposal

Primary PSD Permitting Based Implications (3 of 3)

- ▶ So, you've got a PSD permit, but you need to extend the permit...
 - Not uncommon to request at least a first-time extension of the 18-month PSD permit construction window – but now the NAAQS are proposed to be updated...
 - ◆ Addressed in PSD 2014 permit extension guidance
 - ◆ <https://www.epa.gov/nsr/guidance-extension-prevention-significant-deterioration-psd-permits>
 - ◆ EPA addresses on page 6 of the referenced guidance
 - ◆ Indicated as a case-by-case evaluation – no definitive statements one way or the other
 - ◆ Magnitude of emissions, prior modeling results, influence of precursor pollutants, etc. could all play a part in any case-by-case determination

Don't Forget About the Precursors!

- ▶ Current EPA guidance wrinkle – in for one in for all approach for direct PM_{2.5} and precursors
 - <https://www.epa.gov/scram/guidance-ozone-and-fine-particulate-matter-permit-modeling>
 - Per current guidance, if you trigger PSD for NO_x and/or SO₂, you need to evaluate both secondary impact from NO_x and SO₂, but also model direct PM_{2.5} for comparison to the SILs, even if PM_{2.5} is < SER
 - ◆ A more recent guidance development since July 2022, that should be considered

So, You Are In a State with Minor Source Permit Modeling Requirements

- ▶ Case-by-Case Situation (depending on the agency, how State NAAQS were established, etc.)
 - With a revised NAAQS, agency may not be comfortable issuing even a minor source permit for a project that exceeds Federal NAAQS (before State NAAQS/regulatory updates)
 - Incorporation by reference – do State NAAQS become effective at same time?
 - As with PSD, confer with the local permitting authority for any modeling evaluations for ongoing/planned permit applications
 - Be sure to confer with the local agency!

Recent Risk and Technology Reviews

Category	New Requirements	Publication Date
Miscellaneous Coating Manufacturing	<ul style="list-style-type: none"> ▪ Capture & Control for Inorganic HAP ▪ Metal HAP gr/dscf limits 	2/22/23
Lime Manufacturing Plants	<ul style="list-style-type: none"> ▪ Limits for HCl, Hg, THC, D/F ▪ Initial compliance testing ▪ Monitoring for DSI, ACI, RTO 	1/5/23 [PROPOSED]
Site Remediation	<ul style="list-style-type: none"> ▪ Removal of CERCLA/RCRA exemptions 	12/22/22
Mercury Cell Chlor-Alkali Plants	<ul style="list-style-type: none"> ▪ Hg emissions prohibited 	5/6/22
Stationary Combustion Turbines	<ul style="list-style-type: none"> ▪ Lifts stay of new lean premix/diffusion flame limits ▪ Initial compliance testing ▪ Oxidation catalyst or alternative monitoring petition 	3/9/22
Lead Acid Battery Manufacturing	<ul style="list-style-type: none"> ▪ Revised Pb limits ▪ 5-year recurring stack tests ▪ Work practices for fugitives ▪ BLDS ▪ Electronic reporting 	2/23/22 [PROPOSED]
Primary Copper Smelting	<ul style="list-style-type: none"> ▪ New emission limits for PM and Hg ▪ Electronic reporting 	1/11/22 [PROPOSED]

CEDRI and Electronic Reporting

- ▶ CEDRI is located on the Central Data Exchange (CDX)
- ▶ CEDRI aggregates the uploaded files and completed forms into a single package for submission
- ▶ Certifying users must sign submittal packages using the CDX Cross-Media Electronic Reporting Regulation (CROMERR) service
- ▶ Submission files stored in CDX CROMERR, available to:
 - Submitters, authorized EPA, regional, state, local and tribal reviewers
 - After review, files also publicly available in WebFIRE

Accessing CDX and CEDRI

- ▶ <https://cdx.epa.gov/>
- ▶ CEDRI can be added as a program service of CDX

The screenshot displays the EPA CDX Central Data Exchange interface. At the top, the EPA logo and navigation menu are visible. The user is logged in as CEDRITESTUSER133. The main content area shows a 'Services' table with columns for Status, Program Service Name, and Role. A single service is listed: 'CSPP: Submissions for Chemical Safety and Pesticide Programs' with the role 'Primary Authorized Official'. Below the table, two buttons are present: 'Add Program Service' (highlighted with a red box) and 'Manage Your Program Services' (highlighted with a green box). A 'News and Updates' section on the right shows 'No news/updates.'

Status	Program Service Name	Role
	CSPP: Submissions for Chemical Safety and Pesticide Programs	Primary Authorized Official

CEDRI Roles

- ▶ Preparer: the person responsible for the preparation of reports for signature
 - Contractors are permitted to register as a Preparer and may assemble submission packages for the Certifier's approval and signature
- ▶ Certifier: the duly authorized representative of the source/facility or more commonly referred to as the "owner" or "operator" of the facility
 - The Certifier is authorized to modify the package a Preparer has assembled, and sign and submit the package to CDX
- ▶ Note “Organization” should be the user’s employer

Certifier Registration

- ▶ For users registering as a Certifier, identity proofing is required
- ▶ Certifiers are prompted to follow the registration steps using the LexisNexis identity verification or the Electronic Signature Agreement (ESA) signing process
 - The LexisNexis identity verification requires Personally Identifiable Information (PII). If this verification is passed, the ESA can be signed instantly and electronically
 - Otherwise, the ESA process requires the Certifier to send a paper form to the EPA and can take up to 2 weeks to complete the registration process
 - The ESA must be processed before the Certifier role is activated within CDX
 - Be aware of timing – recommend setting up the Certifier in advance

Setting up CEDRI

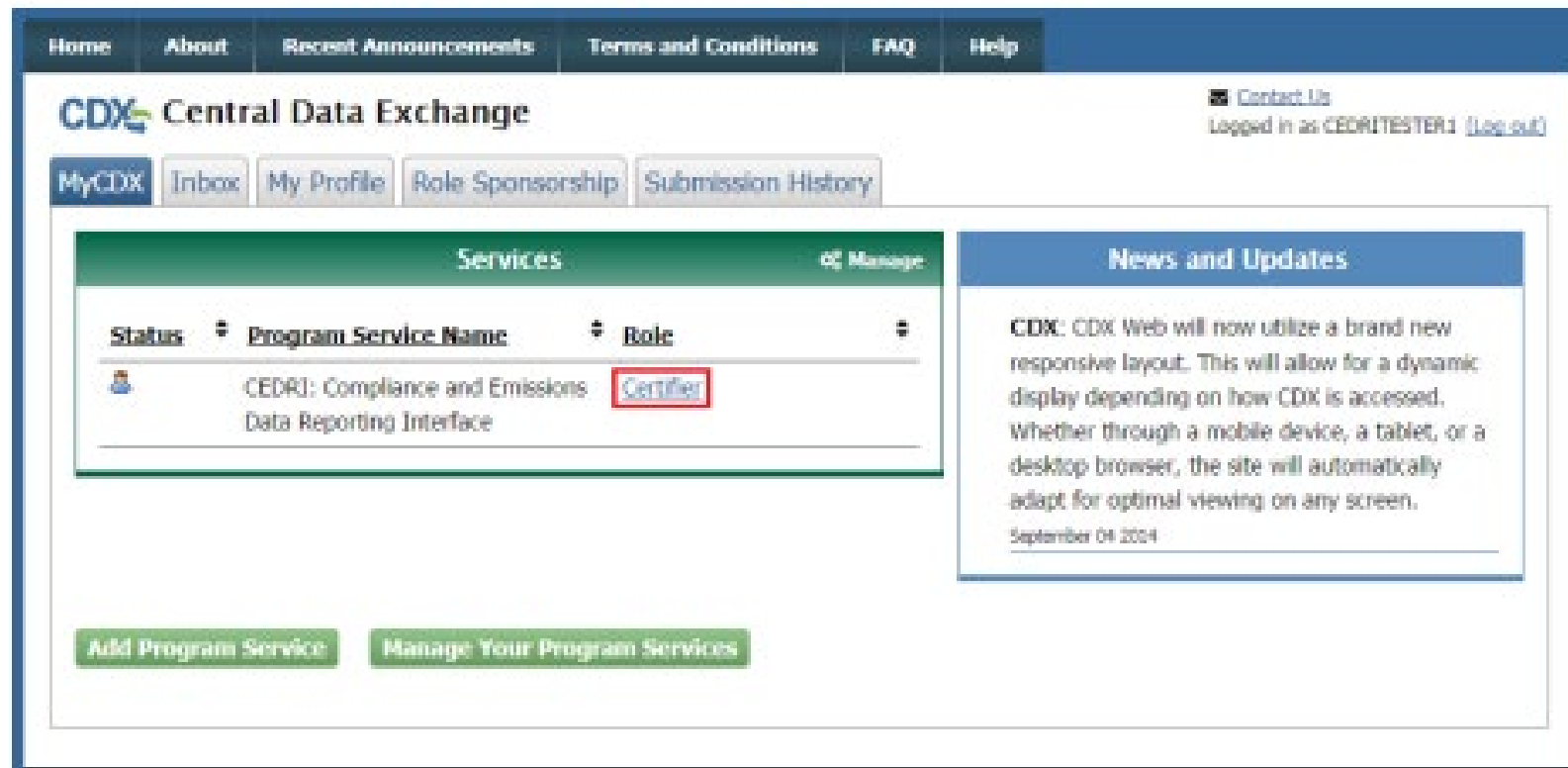
- ▶ An account must be associated with a facility
 - CEDRI includes functionality to search for or create a facility

The screenshot shows the EPA Core CDX Registration page. The navigation bar includes Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. The user is logged in as CEDRIESTUSER133. The progress bar shows steps: 1. Program Service (checked), 2. Role Access (checked), and 3. Organization Information. The Registration Information section shows Program Service: Compliance and Emissions Data Reporting Interface and Role: Preparer. Below this is a search form with fields for Facility ID, Facility Name, Facility Address, City, State, and ZIP Code. A "Search Facilities" button is highlighted with a red box. Below the form, there is a link to "Envirofacts Search" and a "Continue Without Facilities" button, also highlighted with a red box.

The screenshot shows the EPA Core CDX Registration page after a search. The progress bar now includes a fourth step: 4. Confirmation. The Registration Information section remains the same. Below this is a "Facility Search Results" section with instructions to select a facility from a list. A table header is visible with columns: EPA Registry ID, Facility Name, Facility Address, EPA Programs Reporting, and Alternate EPA Registry IDs/Program IDs. Below the table, a "No Facilities Found" message states: "Your search criteria did not match any facilities. You may return to the search form and try again. If the facility doesn't exist, you may create a facility by clicking the 'Create New Facility' button." Three buttons are visible: "Select", "Search Again", and "Create New Facility" (highlighted with a red box), and "Continue Without Facilities".

Submitting in CEDRI

- ▶ Once the Certifier or Prepare is logged in, select the Role(s) hyperlink to review or prepare reports



The screenshot displays the CDX Central Data Exchange web application. At the top, there is a navigation bar with links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. Below this, the CDX logo and 'Central Data Exchange' text are visible, along with a 'Contact Us' link and a user login status: 'Logged in as: CEDRITESTER1 (Logout)'. A secondary navigation bar includes 'MyCDX', 'Inbox', 'My Profile', 'Role Sponsorship', and 'Submission History'. The main content area is divided into two sections: 'Services' and 'News and Updates'. The 'Services' section features a table with columns for Status, Program Service Name, and Role. A single row is shown with a status icon, the program name 'CEDRI: Compliance and Emissions Data Reporting Interface', and the role 'Certifier', which is highlighted with a red box. Below the table are two buttons: 'Add Program Service' and 'Manage Your Program Services'. The 'News and Updates' section contains a text announcement about a responsive layout update, dated September 04 2014.

Status	Program Service Name	Role
	CEDRI: Compliance and Emissions Data Reporting Interface	Certifier

CEDRI Reporting Templates

- ▶ US EPA mandates use of industry-specific spreadsheet templates available here: <https://www.epa.gov/electronic-reporting-air-emissions/cedri#63>
- ▶ Multiple tabs to complete including, but not limited to:
 - Company information
 - Compliance option
 - Detailed descriptions of deviations
 - Detailed descriptions of parameter monitoring system downtime
 - Many tabs for CEMS
 - Descriptions of changes at site
- ▶ Template must be uploaded and submitted in CEDRI

Electronic Reporting Tool (ERT)

- ▶ The ERT is designed to electronically create and submit stationary source sampling test plans to regulatory agencies and, after approval, to calculate and submit the test results as an electronic report to the regulatory agency
- ▶ ERT is a Microsoft Access based program that can be downloaded at: <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>
- ▶ Users manually enter data into the ERT
- ▶ ERT produces a submittal package (.zip), which consists of the test data and an XML export file
- ▶ Files are uploaded and submitted in CEDRI

ERT Main Menu

frmMainMenu

ERT - Main Menu

Setup / Test Plan

Test Plan

Quick Jumps

SCC

Process Info

Locations/Methods

Test Data

Run Data

Process Data

Tester DQ Assessment

Attachments

Completeness Check

Report Verification

Regulatory Agency Review

Test Plan Review

Regulatory Field Observation Documentation

Regulatory Assessment of Supporting Documentation

Emissions Results

Comprehensive Regulatory Test Assessment

Printed Reports

Select Report / Data Table

Administration

Help / Sys. Reports

Current Project Data Set: C:\Users\cpool\Desktop\ProjectData\Test.acddb - Date Created: 4/1/2016

Project Submittal History:

Action	SubmitDate	SubmittedTo	SubmittedFr	Comment
*				

Record: 1 of 1 No Filter Search

ERT Test Plan

Test Plan

Test Plan Title: * Fake Test Plan Test Plan Date: * 4/8/2016 Open Expanded

Facility/Tester Permit/SCC Locations/Methods Regulations Process/APCD Methods cont. Audit/Calibrations Schedule Reviewers Attach.

Facility Name: * Trinity Atlanta

Address: * 3495 Piedmont Rd
Bldg 10, Suite 905

City: * Atlanta

State/Zip: * GA 30305-

County: * Fulton Co

Contact: * Chris Pool

Phone: * (678) 441-9977

Fax:

email: * cpool@trinityconsultants.com

AFS Number:

Industry NAICS: [Search on the Web](#)

FRS: * 000000000000 [Search on the Web](#) ?

State ID:

Latitude: ?

Longitude:

Testing Company: * Pool Testing Services USA LLC [Attach Test Company Certification](#)

Address: * 5468 Peachtree Rd

City: * Chamblee

State/Zip: * GA 30341-

Contact: * Chris Pool

Phone: * (678) 441-9977

Fax:

email: * cpool@trinityconsultants.com

Testing Company Project Number:

[Attach Field Team Lead Certification](#)

(* required fields)

ERT Test Plan

Test Plan

Test Plan Title: Fake Test Plan Test Plan Date: 4/8/2016 Open Expanded

Facility/Tester Permit/SCC Locations/Methods Regulations Process/APCD Methods cont. Audit/Calibrations Schedule Reviewers Attach.

1. Please enter sampling location information. (all dimensions in inches)

(Required before test data entry)

Add Location Attach File

Location: (click to view/edit)	Inlet/Outl	Total Trave	Ports	Round Duct Diam	Duct Le	Duct Wid	Equivalent l	Up Stream Distar	Down Stream Dis	Emissions are
Stack	Inlet	2	2	1				5	5	<input type="checkbox"/>

(Note: UpStreamDist = Distance from upstream disturbance (Distance A - Fig. 1-1, RM1) ; DwnStreamDist = Distance from downstream disturbance (Distance B - Fig 1-1, RM1))

2a. Please provide the following information for each test parameter. (Required before test data entry)

Add Target Parameters

Location	Test Method	Target Parameter	Num Test Runs	Test Run Duration	Comments
Stack	Method 5	Filterable Particulate	3	60	

Record: 1 of 1 No Filter Search

2b. Please select the Emissions Units of Measure for each location.

Add Emissions/Concentrations

Local	Method	Units of Measure	Corre	Corrected %	Process Rate, Parameter
Stack	Method 5	lb/hr		0	

ERT Stack Test Run Data

Run Data Details

Facility: Open Expanded

Permitted Source ID/Description:

Select Location - Method: Add New Run Data Delete Run Data

Select Run: Change Run Number Change Run Date

Method Setup | Header Data | Point Data | Lab Data | Sampling/Stack Data Results | Cyclone Cut Size | Emissions

Method: RunNumber: RunDate:

Equipment ID	Calibration	Checks	Pre	Mid	Post
Dry Gas Meter: <input type="text"/>	Y: * <input type="text"/>	Vacuum: <input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
Control Console: <input type="text"/>	DH@:* <input type="text"/>	Leak Check Total Volume: * <input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
Umbilical: <input type="text"/>	Cp: * <input type="text"/>	Leak Rate: <input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
StackTC: <input type="text"/>	Dn: * <input type="text"/>	Pitot: <input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
TedlarBag: <input type="text"/>	Ambient		Nozzle: <input type="text"/>	<input type="text"/>	<input type="text"/>
OrsatPump: <input type="text"/>	Pb: * <input type="text"/>	Pstatic: * <input type="text"/>	Stack TC: <input type="text"/>	<input type="text"/>	<input type="text"/>
Probe/Pitot: <input type="text"/>	Temperature: <input type="text" value="0"/>	Vlc: <input type="text" value="0"/> Vlc Components	Micromanometer ID: <input type="text"/>	<input type="text"/>	<input type="text"/>
Nozzle: <input type="text"/>	Filters		Sensitivity: <input type="text" value="0"/>	<input type="text"/>	<input type="text"/>
FilterNum1: <input type="text"/>	FilterNum2: <input type="text"/>	FilterNum3: <input type="text"/>	Concentrations (run ID if used)		
			% CO2:* <input type="text"/>	- User Entered - <input type="text"/>	
			% O2: * <input type="text"/>	- User Entered - <input type="text"/>	
			Defaults		
tstd * <input type="text" value="68"/>	Pstd * <input type="text" value="29.92"/>	% CO <input type="text" value="0"/>	Fuel Type: <input type="text"/>	Fd <input type="text" value="0"/>	Fw <input type="text" value="0"/>
			Fc <input type="text" value="0"/>	<input type="text"/>	<input type="text"/>

Fields marked with * are required to calculate emissions / concentrations.

ERT Stack Test Run Data

Run Data Details

Facility: Open Expanded

Permitted Source ID/Description:

Select Location - Method: Add New Run Data Delete Run Data

Select Run: < > Change Run Number Change Run Date

Method Setup | Header Data | Point Data | Lab Data | **Sampling/Stack Data Results** | Cyclone Cut Size | Emissions

Method: RunNumber: RunDate:

Sampling Train Parameters:		Stack Gas Parameters:			
NetRunTime:	<input type="text"/>	% H2O:	<input type="text" value="0"/>	Vs:	<input type="text"/>
NetTravPts:	<input type="text" value="0"/>	% H2Osat:	<input type="text" value="0"/>	Dstk:	<input type="text" value="1"/>
Dn:	<input type="text"/>	Mfd:	<input type="text" value="1"/>	Dwidth:	<input type="text"/>
Cp:	<input type="text"/>	% CO2:	<input type="text" value="0"/>	Dlngh:	<input type="text"/>
Y:	<input type="text"/>	% O2:	<input type="text" value="0"/>	As:	<input type="text" value="0.005"/>
Pb:	<input type="text"/>	% CO + N2:	<input type="text" value="100"/>	Qsd:	<input type="text"/>
DeltaH:	<input type="text"/>	Fo:	<input type="text" value="0.00"/>	Qaw:	<input type="text"/>
Vm:	<input type="text" value="0.000"/>	Md:	<input type="text" value="28.00"/>	MMBtu/Hr:	<input type="text"/>
tm:	<input type="text"/>	Ms:	<input type="text" value="28.00"/>		
Vmstd:	<input type="text" value="0"/>	Pg:	<input type="text"/>		
Vlc:	<input type="text" value="0"/>	Ps:	<input type="text"/>		
Vwstd:	<input type="text" value="0.00"/>	ts:	<input type="text"/>		
% I:	<input type="text"/>	DeltaPavg:	<input type="text"/>		

View All Runs

Note: Double click in fields to see the formulas

Creating ERT Submittal File

Create ERT Submission File

Complete the steps below to create an ERT Submission File

- 1.** Set/Review Test and Process Run Associations
- 2.** Enter Project Data Set Submittal Data
 - Action:
 - Date:
 - Submitted To:
 - Submitted To Email:
 - Submitted From:
 - Submitted From Email:
 - Comment:
- 3.** Create ERT Submission
 -

Optional Steps

- 4a.** Go to the CDX Website
- 4b.** Email Submission File

Questions?

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Biographical Information

**Sherry L. Hesselbein, Deputy General Counsel, HESS&PQ Law
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Sherry Hesselbein is Deputy General Counsel, overseeing the Health, Environmental, Safety, Security and Product Quality group in Marathon Petroleum's Legal Department. She joined Marathon in 2010 as the remediation attorney, with an emphasis on RCRA and CERCLA compliance. She then counseled the refining operations organization on environmental compliance and served as the Legal Department's subject matter expert on the Clean Air Act. Sherry has also advised the company on fuels compliance and product quality matters before assuming her role as supervisor of the group. Sherry has held multiple temporary assignments within Marathon including Environmental Supervisor at the Catlettsburg, Kentucky Refinery. Prior to joining Marathon, Sherry was an associate in the Columbus office of Ulmer & Berne LLP practicing in the areas of environmental and construction law and an assistant attorney general with the Ohio Attorney General's Office Environmental Enforcement Section.

Sherry holds a J.D. from The Ohio State University Moritz College of Law and a B.S. in earth, atmospheric and planetary science from the Massachusetts Institute of Technology. She is a member of the Women for Economic and Leadership Development (WELD).

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Mr. Wheeler provides air quality permitting and compliance services for industries such as oil and gas, metallurgical coke production, secondary aluminum recycling, petroleum refineries, steel mini-mills, and gas-fired electricity generating units. He has developed air dispersion modeling assessments for PSD demonstrations as well as state-level impact analyses. Mr. Wheeler currently operates as a Managing Consultant in Trinity's Columbus, Ohio office. He received a Bachelor's degree in chemical engineering from the University of Michigan.