



Minimum Data Requirements (MDRs) for CAA Stationary Sources Compliance

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Office of Compliance
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
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<http://cfpub.epa.gov/compliance/resources/publications/data/air/policies/>

TABLE 1
SUMMARY OF NATIONAL MINIMUM DATA REQUIREMENTS (MDRs)
FOR CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE

Note: Unless otherwise noted, both Regions and states/locals report their data. The reportable universe of facilities for AFS includes: Major, Synthetic Minor and Part 61 NESHAP Minor facilities, other facilities identified within the CMS Evaluation Plan, any facility with a formal enforcement action and any facility with an active HPV. Facilities with formal enforcement actions (administrative orders, consent decrees, civil or criminal referrals and actions) should be tracked in AFS until the resolution of the violation, regardless of classification. If a minor source is included in the CMS universe, has a current enforcement action of <3 years old, or is listed as a discretionary HPV, it is considered reportable to AFS. Individual regional/state agreements are not superseded by this listing.

<u>Identification</u>	AFS <u>Acronym</u>
1. Facility Name	PNME
2. State	STAB/STTE
3. County	CNTY
4. Facility Number	PCDS
5. Street	STRS
6. City	CYNM
7. Zip Code	ZIPC
8. SIC or NAICS Code	SIC1/NIC1
9. Government Ownership	GOVT
10. HPV Linkage and Key Action (Day Zero)	Linked from Action Data

Compliance Monitoring Strategy (CMS)

11. CMS Source Category	CMSC
12. CMS Minimum Frequency Indicator	CMSI

Note: Generally EPA enters these fields into AFS; state/locals provide this information per agreement with the EPA Region. An EPA Region may delegate data entry rights to a state/local agency.

All Regulated Air Program(s) [Note: All applicable air programs should be reflected at the plant level of AFS.]

13. Air Program	APC1
14. Operating Status	AST1
15. Subparts for NSPS, NESHAP and MACT	SPT1

Note: Any applicable subpart for the NSPS, NESHAP or MACT air program at major and synthetic minor sources, minor source NESHAP and all other facilities reported as MDR. Reporting of minor source NSPS and MACT subparts are optional but recommended.

Regulated Pollutant(s) within Air Program(s)

16. Pollutant(s) by Code or Chemical Abstract Service Number	PLAP/CAPP
17. Classification(s): EPA/ST	ECLP/SCLP
18. Attainment Status: EPA/ST	EATN/SATN
19. Compliance Status: EPA/ST	ECAP/SCAP

Actions Within Air Programs (includes Action Number, Type, Date Achieved)

20. Minimum Reportable Actions:

- Informal Enforcement Actions: Notice of Violation(s)
- Formal Enforcement Actions: Administrative Order(s) and Assessed Penalties, Consent Decrees and Agreements, Civil and Criminal Referrals, Civil and Criminal Actions
- HPV Violation Discovered: Linked actions are FCEs, PCEs, Stack Tests (Observed or Reviewed), Title V Annual Compliance Certifications, Stack Test Notification Receipt
- HPV Addressing Actions: Linked actions include but are not limited to State/EPA Civil or Criminal Referrals, State/EPA Civil or Criminal Actions, Administrative Orders, Consent Decrees, Source Returned to Compliance by State/EPA with no Further Action Required.
- HPV Resolving Actions: Linked actions include but are not limited to Violation Resolved, Closeout Memo Issued, Source Returned to Compliance by State/EPA with no Further Action Required.
- Full Compliance Evaluations (On or Off Site)
- Stack Tests: Pass/Fail/Pending codes (PP/FF/99) are reported in the results code field, pending codes must be updated within 120 days.
- Title V Annual Compliance Certification Due/Received: Reported by EPA unless otherwise negotiated. The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the “Title V Annual Compliance Certification Due/Received by EPA” action, and is not enforcement sensitive.
- Title V Annual Compliance Certification Reviewed: Includes Results Codes for Annual Compliance Certification reviews: in compliance (MC), in violation (MV) and unknown (MU). Annual Compliance Certification deviations(s) will be indicated in RD08 for EPA reviews (and state reviews as negotiated).
- Investigations: EPA Investigation Initiated (started) and State/EPA Investigation Conducted (finished). State Investigation Initiated is added for optional use. EPA and State Investigation Initiated (started) action types are enforcement sensitive.

Additional Action Information:

21. Results Code

RSC1

Note: Pass/Fail/Pending (PP/FF/99) codes are reported for Stack Test actions. Compliance Results Codes of “In Compliance (MC), In Violation (MV), or Unknown (MU)” are entered for Title V Annual Compliance Certification reviews.

22. RD08 (Certification Deviations)

RD81

Note: EPA reports into AFS unless otherwise negotiated. Compliance Codes of “In Compliance (MC), In Violation (MV), or Unknown (MU)” are entered for Title V Annual Compliance Certification reviews.

23. Date Scheduled

DTS1

Note: The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the “Title V Annual Compliance Certification Due/Received by EPA” action, and is not enforcement sensitive.

24. HPV Violation Type Code(s)

VTP1

Note: To be identified when the Day Zero action is established.

25. HPV Violating Pollutant(s)

VPL1

Note: To be identified when the Day Zero action is established.

Timeliness Standard

26. Action Reported within 60 Days of Event reported in the Date Achieved (DTA1) field of the action record for state and local agencies, with a minimum upload of six (6) times per year. Monthly updating is encouraged. Federal Data is to be reported on a monthly basis.

OPTIONAL/DISCRETIONARY DATA REPORTING TO AFS: NON-MDR DATA

The following items cover data that is not considered an MDR, but will be useful and helpful for program implementation, evaluation and oversight. State and local agencies are encouraged to report the following items whenever practicable.

- Minor Facility information: For minor sources that are not MDR (MDR for minor facilities is defined as: Minor NESHAP, a minor facility identified within the CMS plan for evaluation, minor facilities with an enforcement action <3 years old, or any HPV case regardless of class) reporting is optional but encouraged. Minor source information would include NSPS and MACT subpart applicability.
- Stack Test Pollutant (PLC1)
- Partial Compliance Evaluations (PCEs) and specific reporting of On-Site PCE activity defined as: Complaint Partial Compliance Evaluation, Permit Partial Compliance Evaluation, Process Partial Compliance Evaluation, Partial Compliance Evaluation On-Site Observation. (Note: All PCEs are required to be reported by EPA Regional offices. Also, any negotiated PCEs that are part of an alternative frequency which is part of an agency's CMS plan are required to be reported.)
- Reporting more frequently than every 60 days.
- State Investigations initiated (Enforcement Sensitive).
- Title V Permit Program Data Elements (PPDEs): Required for reporting to AFS by the Office of Air Quality Planning and Standards (OAQPS), used by the Office of Enforcement and Compliance Assurance (OECA) for major source universe population. To be established when the Title V permit is issued. AFS will require the establishment of an AFS ID, the individual permit number, category, and event type for permit issued plus the date achieved. Permit Program Data Elements (PPDEs) include the Permit Number (ASPN), Permit Category (PMTTC), and Permit Issuance Event Types (IF-Permit Issued and IR-Permit Renewal) and the date (PATY/PDEA).