



**United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Compliance**

July 2005

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, any facility with an active HPV. Individual regional/state agreements are not superceded by this listing.

<u>Identification</u>	<u>Covered by the 2001 ICR</u>	<u>AFS Acronym</u>
1. Facility Name	Yes	PNME
2. State	Yes	STAB/STTE
3. County	Yes	CNTY
4. Facility Number	Yes	PCDS
5. Street	Yes	STRS
6. City	Yes	CYNM
7. Zip Code	Yes	ZIPC
8. SIC or NAICS Code	Yes-SIC	SIC1/NIC1
9. Government Ownership	Yes	GOVT
10. HPV Linkage and Key Action (Day Zero)	Yes	Linked from Action Data
<u>Compliance Monitoring Strategy (CMS)</u>		
11. CMS Source Category ¹	Yes	CMSC
12. CMS Minimum Frequency Indicator ¹	Yes	CMSI
<u>All Regulated Air Program(s)²</u>		
13. Air Program	Yes	APC1
14. Operating Status	Yes	AST1
15. Subparts for NSPS, NESHAP and MACT ³	No	SPT1
<u>Regulated Pollutant(s) within Air Program(s)</u>		
16. Pollutant(s)	Yes	PLAP/CAPP
17. Classification(s)	Yes	ECLP/SCLP
18. Attainment Status	Yes	EATN/SATN
19. Compliance Status	Yes	ECAP/SCAP
<u>Actions Within Air Programs⁴</u>		
20. Minimum Reportable Actions:		
Notice of Violation(s)	Yes	
Administrative Order(s) and Assessed Penalties	Yes	
(Includes Enforcement Orders, Consent Decrees and Consent Agreements)		

Civil Referrals	Yes	
HPV Violation Discovered ⁵ Examples: FCEs, On-or Off-Site PCEs, Stack Tests, Title V Annual Compliance Certifications	No	Linked from Action Data
HPV Addressing Actions ⁶	Yes	Linked from Action Data
HPV Resolving Actions ⁷	Yes	Linked from Action Data
Full Compliance Evaluations	Yes	
Stack Tests ⁸	Yes	
Title V Annual Compliance Certification Received ^{9 11}	Yes	
Title V Annual Compliance Certification Reviewed ^{10 12}	Yes	
Investigations ¹³	Yes	

Additional Action Information:

21. Results Code ^{8 10}	Yes	RSC1
22. RD08 (Certification Deviations) ^{9 10}	Yes	RD81
23. Date Scheduled ¹¹	Yes	DTS1
24. HPV Violation Type Code ¹⁴	No	VTP1
25. HPV Violating Pollutant(s) ¹⁴	No	VPL1

Timeliness Standard¹⁵

26. Action Reported within 60 Days of Event; with minimum of 6 uploads to AFS per year.	No	
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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.

1. 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 or any HPV case regardless of class) reporting is optional but encouraged. Minor source information would include NSPS and MACT subpart applicability.
2. Stack Test Pollutant (PLC1)
3. 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.)

4. Reporting more frequently than every 60 days.
5. State Investigations initiated.
6. 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).

Notes for Table 1:

1. Generally EPA enters this information into AFS; states/locals provide this information per agreement with the EPA Region. An EPA Region may delegate data entry rights to a state/local agency.
2. All applicable air programs should be reflected at the plant level of AFS.
3. 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. Phase-In approach of data entry limits data input to applicable subparts at sources receiving FCEs starting in FY06. Reporting of minor source NSPS and MACT subparts are optional but recommended (unless the minor source is included in the CMS universe, has a current enforcement action of <3 years old and is listed as a discretionary HPV).
4. Includes action number, action type, and date achieved. Penalty amount is also included where appropriate and should reflect assessed penalty (penalty assessed via a formal enforcement action).
5. Actions for Discovery Date are defined as: FCEs, PCEs, Title V Annual Compliance Certifications and Stack Tests. These action types should be linked into the HPV pathway. Phased-In approach for data entry requires HPV Violation Discovered Date to be reported on new HPV cases starting in FY06.
6. Examples of addressing actions include, but are not limited to: State/EPA Civil Action; State/EPA Administrative Order; State/EPA Consent Decree; Source returned to compliance by State/EPA with no further action required. HPV Lead Agency responsible for data entry of actions into AFS, or as negotiated.
7. Examples of resolving actions include: Violation Resolved by State/EPA, State/EPA Closeout Memo Issued, Source returned to compliance by State/EPA with no further action required. HPV Lead agency responsible for data entry of actions into AFS, or as negotiated.
8. Pass/Fail codes (PP/FF) are reported in the results code field.
9. EPA reports and enters into AFS unless otherwise negotiated.
10. Results codes for Annual Compliance Certification reviews are: in compliance (MC), in violation (MV) and unknown (MU).

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

12. Annual Compliance Certification deviations(s) will be indicated in RD08 for EPA reviews (and state reviews as negotiated).

13. 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.

14. HPV Violation Type Code is to be identified when the Day Zero is established, values are listed at:

<http://www.epa.gov/compliance/data/systems/air/afssystem.html>

HPV Pollutants are to be entered with the Day Zero action type. Phased-In approach for data entry requires HPV Violation Type Code and Violating Pollutants to be reported on new HPV cases starting in FY06.

15. Data is to be reported to AFS within 60 days of the event reported in the Date Achieved (DTA1) field of the action record for state and local agencies. Monthly updating is encouraged. Federal data is to be reported on a monthly basis.