



AFS Intermediate Compliance Monitoring Strategy (CMS)

- Review of the CMS Policy and Minimum Data Requirements (MDRs)
- CMS Universe: Access and Data Entry
- Useful CMS Retrievals from AFS



Review of Policy:

The CMS Policy can be found at:

<http://www.epa.gov/Compliance/resources/policies/monitoring/cmspolicy.pdf>

Additional information on implementing the CMS are:

- The AFS Technical Support Document

<http://www.epa.gov/Compliance/planning/data/air/cmstechman.pdf>

- The AFS Business Rules Compendium, Pages 5-7



Goals of the CMS:

- Provide National consistency;
- Improve communication and enhance EPA oversight;
- Provide a framework for developing air compliance monitoring programs that focus on achieving measurable environmental results;
- Provide a mechanism for evaluation and compliance.



How the Process is designed to work:

- States/Locals submit a CMS plan biennially for negotiation with the Region;
- State/Locals and Regions maintain records of their compliance monitoring activities and enter data into AFS;



How the Process is designed to work:

- States/Locals and Regions review the results of the activities annually, preparing an annual update to the biennial plan as necessary;
- Regions evaluate the overall compliance monitoring program.



Considerations for Frequency Negotiations:

- Compliance history,
- Location of facility,
- Potential environmental impact,
- Operational practices),
- Use of control equipment,
- Participation in Agency-sponsored voluntary programs (Performance Track),
- Other identified deficiencies.



New MDRs defined by the April 2001 Policy:

- A CMS Category Indicator
- A CMS Frequency Indicator
- Full Compliance Evaluations (FCEs)
- Partial Compliance Evaluations (FCEs)



New MDRs defined by the April 2001 Policy:

- Investigations
- Expanded Stack Test Reporting (compliance)
- Title V Annual Compliance Certification Reviews (including date due & received, deviations, review date and compliance status)



New MDRs defined by the April 2001 Policy:

Note: The new categories of compliance monitoring (FCEs, PCEs and Investigations) replace old levels of inspections (CMS Policy, Section I).



A new functionality defined by the April 2001 Policy:

Automatic Unknown Compliance Status Generation: The compliance status of a source will revert from “in compliance” to “unknown” if an FCE is not completed within the minimum or a negotiated frequency.



The CMS Universe:

- The Plan focuses on major Title V sources and a limited subset of synthetic minor sources.
- These sources are identified in AFS via a CMS Category (CMSC) and a Frequency Indicator (CMSI). A category and frequency indicator should be assigned to all active major sources and 80% synthetic minor sources in AFS.



The CMS Universe:

- You **MUST** have authority to update CMS records on your User Profile Form. The Special Profile Function code to request is:

S: Ability to Update Plant Compliance Monitoring Strategy Information.



The CMS Universe:

Note: You can find a copy of the AFS Profile Form at:

<http://www.epa.gov/Compliance/planning/data/air/userprofileform.pdf>

Be sure to sign it and fax to your Reg AFS Compl Mgr for processing.



AFS Data Entry:

- CMS Category (CMSC)
- CMS Frequency Indicator (CMSI) Note: The CMSI is Enforcement Sensitive.

From the Update Menu:

DATE : 06/21/04

AIRS FACILITY SUBSYSTEM - UPDATE

PGM: AFP040

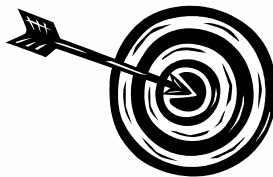
SCREEN: 040

PLANT INFORMATION

MAP: AFM0401

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- 1 GENERAL INFORMATION (300)
- 2 POLLUTANT INFORMATION (301)
- 3 AIR PROGRAMS (302)
- 4 POLLUTANT AIR PROGRAMS (303)
- 5 PERMIT ADMINISTRATION (060)
- 6 MAILING LABEL INFORMATION (305)
- 7 ACTIONS (306)
- 8 COMMENTS (307)
- 9 ASBESTOS INFORMATION (042)
- 10 HIGH PRIORITY VIOLATOR UPDATE UTILITY (314)
- 11 COMPLIANCE MONITORING STRATEGY (315)



ENTER MENU SELECTION: ____

PF1=HELP PF3=END PF4=MAIN PF5=TERM PF10=SCRN PF12=BRWS

SCREEN: ____

Screen 315, Update

DATE : 06/21/04 AIRS FACILITY SUBSYSTEM - UPDATE PGM: AFP315
SCREEN: 315 COMPLIANCE MONITORING STRATEGY MAP: AFM3151

=====

00005 COLORADO LIME COMPANY DBA CALCO 400 E RAILROAD AVE

CMS SOURCE CATEGORY: A  (2004/03/04 - KOZ)
CMS START DATE: 04/03/04

NOTE: CHANGES TO CMS SOURCE CATEGORY MAY HAVE AN EFFECT ON CMS START DATE.

FOR MORE INFORMATION, PRESS PF1 (HELP).

CMS MINIMUM FREQUENCY INDICATOR: 2

PLANNED YEAR(S) OF FULL COMPLIANCE EVALUATION (FCE):

FISCAL YEAR A:	2003	ON-SITE VISIT PLANNED (Y/N):	Y
FISCAL YEAR B:	_____	ON-SITE VISIT PLANNED (Y/N):	__
FISCAL YEAR C:	_____	ON-SITE VISIT PLANNED (Y/N):	__
FISCAL YEAR D:	_____	ON-SITE VISIT PLANNED (Y/N):	__
FISCAL YEAR E:	_____	ON-SITE VISIT PLANNED (Y/N):	__


COMMENT: _____

Screen 516, Browse

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DATE   : 07/12/04      AIRS FACILITY SUBSYSTEM - BROWSE      PGM:  AFP516
SCREEN:  516           COMPLIANCE MONITORING STRATEGY      MAP:  AFM5161
=====
0005  COLORADO LIME COMPANY DBA CALCO      400 E RAILROAD AVE
-----
                                           ( 2004/03/04 - KOZ )
CMS SOURCE CATEGORY:  A - TITLE V MAJOR      CMS START DATE:  04/03/04

CMS MINIMUM FREQUENCY INDICATOR:  2

PLANNED YEAR(S) OF FULL COMPLIANCE EVALUATION (FCE):
    FISCAL YEAR A:  2003      ON-SITE VISIT PLANNED (Y/N):  Y
    FISCAL YEAR B:           ON-SITE VISIT PLANNED (Y/N):
    FISCAL YEAR C:           ON-SITE VISIT PLANNED (Y/N):
    FISCAL YEAR D:           ON-SITE VISIT PLANNED (Y/N):
    FISCAL YEAR E:           ON-SITE VISIT PLANNED (Y/N):

COMMENT:  DFD1 provides the default value

LATEST STATE FCE ACTION:  FS      DATE (YYYYMMDD):  20030905
LATEST EPA FCE ACTION   :           DATE (YYYYMMDD):

PF1=HELP  PF3=END  PF4=MAIN  PF5=TERM  PF10=SCRN      SCREEN:  _____
```

DATE : 06/21/04

AIRS FACILITY SUBSYSTEM

PGM: AFP315

SCREEN: 315

PLANT COMPLIANCE MONITORING STRATEGY - UPDATE

H E L P ----- H E L P ----- H E L P ----- H E L P ----- H E L P ----- H E L P

This screen is used to identify facilities subject to CMS and the frequency that a Full Compliance Evaluation will be performed. Using this screen, you can update the CMS Source Category and CMS Minimum Frequency Indicator, schedule a Full Compliance Evaluation and identify whether an on-site visit is planned for a given fiscal year. A comment field is also available. Update access is restricted by a Special Access Code of 'S' on the security profile. Field help is available for all input fields on the screen.

The following table demonstrates the effect on CMS Start Date when the CMS Source Category is changed.

Current Value of CMSC	New Value of CMSC	Effect on CMS Start Date
blank	A	changes to current date
blank	M	changes to current date
blank	S	changes to current date
blank	O	changes to current date

DATE : 06/21/04

AIRS FACILITY SUBSYSTEM

PGM: AFP315

SCREEN: 315 PLANT COMPLIANCE MONITORING STRATEGY - UPDATE

H E L P ----- H E L P ----- H E L P ----- H E L P ----- H E L P ----- H E L P

Current Value of CMSC	New Value of CMSC	Effect on CMS Start Date
A	M	nothing
A	S	nothing
A	O	nothing
M	A	nothing
M	S	nothing
M	O	nothing
S	A	changes to current date
S	M	nothing
S	O	nothing
O	A	changes to current date
O	M	nothing
O	S	nothing
non-blank	blank	gets blanked out



AFS Data Entry:

- FCEs
- Stack Tests
- PCEs
- Investigations
- Title V Activities



AFS Data Entry:

Use Regional Action Types recommended by your Region. Also listed in the AFS Business Rules.

National Action Types for FCEs:

FE EPA FCE On Site

FS St/L FCE On Site

FZ EPA FCE Off Site

FF St/L FCE Off Site

Screen 306-Adding an FCE

DATE : 06/21/04 AIRS FACILITY SUBSYSTEM - UPDATE PGM: AFP306
SCREEN: 306 PLANT ACTIONS MAP: AFM3062

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00005 COLORADO LIME COMPANY DBA CALCO	400 E RAILROAD AVE
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*ACTION: 025 KEY ACTION (Y/N) : N

*AIR PROGRAM CODE(S) .. : V 7 6 0 _ _ KEY ACTION(S) :

*ACTION TYPE	: FS	ACTION TYPE CATEGORY	: _
ACTION DESCRIPTION ...	: _____		
DATE SCHEDULED (YYMMDD)	: 030930	DATE ACHIEVED (YYMMDD)	: 030905

RESULTS CODE	: MC	PENALTY AMOUNT	:\$ _____
STAFF CODE	: _____	RDE 8	: _____
POLLUTANT CODE	: _____	CHEMICAL ABSTRACT # ..	: _____
CONTRACTOR ID	: _____ - _____		
RDE 16	: _____		

PRIVATE (Y/N) : N



AFS Data Entry:

Use Regional Action Types recommended by your Region. Also listed in the AFS Business Rules.

National Action Types for PCEs:

ES EPA PCE On Site

PS St/L PCE On Site

EX EPA PCE Off Site

PX St/L PCE Off Site



AFS Data Entry:

Stack tests require a PASS/FAIL indicator in the Results Code field in AFS.

You should report a separate action for each pollutant tested. Reporting the pollutant is not mandatory for states/locals, but is required for EPA Stack Tests.



AFS Data Entry:

There are 6 national action types for reporting stack tests. Under the CMS policy, review of a stack tests not observed are reportable.

The National Stack Testing Guidance can be found at:

<http://www.epa.gov/Compliance/resources/policies/monitoring/stacktesting.pdf>



AFS Data Entry:

National Action Types for Stack Tests:

- 2A EPA Source Test Conducted
- TO EPA Req (O/O Cond) Observed
- TE EPA Req (O/O Cond) Not Observed

- 6C ST Source Test Conducted
- 3A Owner/Operated Conducted Source Test (Observed & Reviewed)
- TR O/O Conducted Stack Test Not Observed

Stack Test Action-Browse

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DATE   : 07/12/04           AIRS FACILITY SUBSYSTEM - BROWSE           PGM:  AFP507
SCREEN: 507                 PLANT ACTIONS                             MAP:  AFM5072
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0502 CONOCOPHILLIPS PONC/PONCA CITY REF 1000 S PINE

ACTION: 260 - ST PERF TEST OB

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KEY ACTION(S) ..... : ( 03/06/06 - DJC )
AIR PROGRAM CODE(S) .. : 0 9 8 V M 6
ACTION TYPE ..... : 09 ACTION TYPE CATEGORY :
DATE SCHEDULED (YYMMDD): 02/11/21 DATE ACHIEVED (YYMMDD) : 02/11/21
RESULTS CODE ..... : PP RESULTS DESCRIPTION .. : STACK TEST PASS
PENALTY AMOUNT ..... : RDE 8 ..... :
STAFF NAME ..... : JARED HOWARD
STAFF TITLE ..... : OK - INSPECTOR
POLLUTANT CODE ..... : SO2 CHEMICAL ABSTRACT # .. :
( SULFUR DIOXIDE )
CONTRACTOR ID ..... : -
RDE 16 ..... : DIV. C FLARE FOR ALKY, CA

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AFS Data Entry:

Investigations are generally:

- More resource intensive than an FCE,
- Involve more in-depth assessments, and
- Limited to a portion of a facility,
- Usually require information not available in EPA data systems.



AFS Data Entry:

Investigations are reported to AFS via two action types:

Investigation Initiated (begin)
Investigation Conducted (end).

National Action Types:

EC EPA Investigation Initiated

EI EPA Investigation Conducted

SC State Investigation Initiated

SI State Investigation Initiated



AFS Data Entry:

Title V activity reportable to AFS concerns the receipt and review of Annual Compliance Certifications (ACCs).

EPA is required to report the Due and Received Date of all certifications. All Agencies (EPA, State & Local) are required to report the review of the ACCs.



AFS Data Entry:

All ACC reviews (ST & EPA) are to contain a result of the review: a compliance determination.

AFS



AFS Data Entry:

The National Action types for ACC reporting are:

CC ACC Due/Received by EPA

CB ACC Due/Received by Permit Authority (State/Local Agency)

ER ACC Review by EPA

SR ACC Review by State



ACC Additional Data Entry:

Deviations: A Yes/No indicator used to indicate if deviations were reported in RD81-Regional Data Element 8. (Reportable by EPA Regions unless delegated.)

Results: A compliance determination recorded in the Results Code (RSC1) for reviews. Valid values are MC (In Compliance, MV (In Violation, and MU (Unknown).



Additional info required for Title V ACCs Due/Received:

- EPA may negotiate a delegation of reporting responsibility of the Date Due/Received action to the Permitting Authority.
- The Date Due is reported in the Date Scheduled field, with the Received Date reported as Date Achieved. It is acceptable to report these dates separately using the same action type.



Additional info required for Title V ACCs Due/Recieved:

- EPA reporters are asked to include Deviations (RDE8) and the compliance results (Results Code RSC1) .



Additional info required for Title V ACCs Reviewed:

- EPA reporters are asked to include Deviations (RDE8) and the compliance results (Results Code RSC1) .
- State/Local Agencies are required to report the review results in the Results Code (RSC1) field. Valid values are
 - MC (In Compliance,
 - MV (In Violation, and
 - MU (Unknown).



Useful CMS Retrievals from AFS:

- CMS Universe: Identifies currently flagged sources
- Universe of Sources: Identifies all major and synthetic minor sources, includes a qualitative (Q1) and quantitative (M1) report
- Sources with an Automatic Unknown Compliance Status



Useful CMS Retrievals from AFS:

- CAA Extended Management Reports from OTIS
- Non-Major sources with CMS flags of A, M, or S
- CMS Evaluation Report: Lists sources with a 1- or 2-year frequency without an evaluation.
- Major Sources with no CMS Category Code