December 15, 2008

ECMPS Stakeholder Meeting – Questions and Answers
Arlington, Virginia
November 19, 2008, 1:00 p.m. - 5:15 p.m.

Q1: What is the difference between the Client Tool Preview (CTP) and the production version of the Client Tool?

During this transition, there are two systems available. Those of you who have switched over to ECMPS this year for reporting your official data are using the production version. This will be the version that everyone uses in the first quarter of 2009. The email for production technical support (which is listed on the Resources handout) is ecmps-support@pqa.com.

For testing purposes, the Client Tool Preview can be used with test data. The testing software matches the production version. The email address for testing support is ecmps-testing@pqa.com.

Q2: Are Designated Representatives (DRs) the only people who can assign ECMPS agents, or can Alternate Designated Representatives (ADRs) also do this?

Both DRs and ADRs can assign agents. Stakeholders should bear in mind that whenever a representative's association with a facility is ended, the representative's agent's relationships with that facility are also ended. It is recommended that the DR and ADR assign the same agents to provide redundancy and provide for maintaing the agents' relationships with the facility in the event that one of the representative's relationships with the facility is ended. Agent relationships can be assigned in the CAMD Business System (CBS) or via a paper form available on CAMD's website.

Q3: Back on the slide about support requests, how is EPA communicating to the Part 75 community about the resolutions to policy questions and software bugs?

Software bugs that have been corrected are listed in the release notes for each new version of the Client Tool.

Q4: Are these bug corrections communicated during the reporting period -- after they are discovered but before they are corrected in a release?

Yes. There is a "Known Issues" page on the ECMPS Support Website (ecmps.pqa.com) where the status of any known software bugs is listed as soon as a bug is identified.

Q5: What should a reporter do if he/she determines that a software bug is creating a data problem?

The reporter should contact technical support and notify them that a bug is causing an evaluation error. At this point, EPA can apply an "administrative override" to allow the reporter to submit data despite having an evaluation error that was caused by a bug. In some cases, it is possible to provide a patch that can correct the bug in a reporter's Client Tool software.

Q6: If EPA provides an administrative override, how do they communicate this to the reporter?

First, the reporter receives an email through the support request tracking system when an administrative override is applied. Then, the Feedback Report, which is sent to the DR and others, will contain information indicating that the evaluation error was replaced with an administrative override.

Q7: What about policy questions -- how are these decisions disseminated?

Most policy questions do not generate new information that needs to be disseminated. For example, if a source does not agree with a data check based on the Part 75 rule, then PQA forwards those questions to the EPA. Most times the question has been answered in existing reporting guidance and the person simply is not aware of it. If there is any new information related to reporting requirements, then we handle it the way we always have -- we post the information on our website.

Q8: I have been told that if a person is an agent for a DR making official submissions, then that person receives all of the Feedback Reports for any unit associated with the DR, even if that person is not a submission agent for some of those units. Is there a way to have a plant-specific agent, or limit the Feedback Reports that go out to a specific agent, so that agents do not have to receive every Feedback Report for each unit associated with a DR?

Submission agents are assigned at a unit level, so they should only see the Feedback Reports for the units assigned to them. Retrieve agents, however, are assigned on a representative level and thus receive every Feedback Report for each unit associated with the DR. Sometimes DRs and ADRs have assigned people as both Retrieve *and* a Submit agent, which is unnecessary because Submit agents, by default have rights to retrieve data. If anyone believes that they are receiving too many Feedback Report emails, they should contact technical support for help with resolving this.

Q9: On the Feedback Reports, my understanding is that when an agent is asked to click on the "certification" button, there is an opportunity to provide a comment, which is stored in the Client Tool database. Is that comment also included in the Feedback Report sent to the DR and/or ADR?

Comments are added through the Client Tool add/edit screens. They are included in ECMPS similarly to the way that comments are included in the legacy system -- as part of the data. Comments are not included in the Feedback Report in either system. EPA may consider adding comments to the Feedback Report.

Q10: On program implementation dates, a lot of people are not in agreement with the data being populated, for example, in the start date for the NO_x Budget Program. I was under the impression that ECMPS was not populating any of that data, and that the data would come from the source. Then, if there were any disagreement over the data, EPA could contact the source.

ECMPS contains one set of data, but there is another set of data that is contained in the CAMD Business System (CBS). The dates in CBS have undergone some restructuring. Some of the dates used in the Electronic Data Reporting (EDR) format were used to represent different events. In ECMPS, we decided to create distinct dates so that each date only represents one event. If a reporter believes that a date has been migrated over incorrectly, then that person needs to contact EPA and we will work with them to resolve the issue before they attempt to report. There is a relationship between the dates in CBS and the data evaluation checks in ECMPS. If a reporter suspects that an incorrect date in CBS is causing evaluation errors in the monitoring plan data, then that person should contact technical support so that the issue can be resolved.

Q11: For example, if an ozone season only reporter entered a program start date that was correct when the monitoring plan was created, but then subsequently the unit became an annual reporter, why is the original date now being challenged?

In ECMPS, the reporting frequencies for programs are being tracked with start and end dates. If there is a problem with unit program dates, reporters need to contact the EPA or technical support to resolve the issues. We are aware that there are situations where the migration from the legacy system to ECMPS has resulted in these types of questions.

Q12: If several units are affected by this unit program date change, can it be addressed globally?

At this time, individual sources should contact us so that we can research the situation and issues like the applicability of the Acid Rain Program.

Q13: Do the EDR and ECMPS reporting instructions give the same guidance on reporting program dates?

The Client Tool uses the dates that are in CBS, so the logic of the Client Tool does not impact unit program dates. We might need to have a follow-up discussion about this.

Q14: If I understand correctly, people who are not signed up as of today to use the production version will not have access to a production version until March 2009. If that is true, is it possible to extend the testing period to allow people to work with their data between January and March?

At this time, we only have funding to support testing until January 15, 2009. We do not have a federal budget yet, so we are operating without knowing what can be expected for 2009.

You can still register to test now. Once you have the Client Tool Preview installed, you will have access to your data after January 15, 2009, even if there is no technical support for testers after that time.

Q15: If I make corrections to dates via CBS, will those corrected dates be loaded into the Client Tool?

In the new ECMPS system, a decision was made that program dates should be managed through CBS rather than reported with the monitoring plan data. These dates should not change once they are entered. When a user logs into the Client Tool, the unit facility data is pulled down from CBS for use in the Client Tool. You can view these dates on the Client Tool monitoring plan add/edit screens, but you cannot edit them there.

If you have questions about a unit's commence commercial operation date or commercial operation date, contact EPA to correct these dates.

Q16: Will all legacy data for every unit be loaded into the new ECMPS system by March 15, 2009?

We will load all of the data that are necessary for reporters to be able to submit data in quarter one of 2009. Data for ozone-season only reporters may be loaded later for reporting in second quarter 2009.

Will all of the ozone-season only units be checked to ensure that they did not convert to annual reporting?

Yes.

Q17: Some historical QA tests affect current emissions data. Is there a list of these data that will affect emissions data?

We will show you some tips during the demo about how to avoid having to deal with historical QA data errors that are not relevant to the emissions data submission that you are trying to make.

Q18: On the tutorials, I recently visited this page on the ECMPS Support Website (ecmps.pqa.com) and I could not find a place to download the tutorials. Also, one of the tutorials that was previously posted had been removed.

One tutorial was removed because that area of functionality -- Evaluate -- has changed in the Client Tool. We are also updating the Quick Start Guide because it currently includes some of the Client Tool interface that has since changed.

As far as downloading, we tried to gauge the number of users who were using that functionality. We did not see a lot of demand for that feature, so we removed it. If you would like copies of the tutorials to watch offline, please email technical support and we will send those to you. If demand increases for downloadable tutorials, we will put those back on the website.

Q19: In my opinion, the Client Tool is very similar to MDC, so the problems I'm having are not related to using the Client Tool; my problems are related to the changes in reporting from EDR to ECMPS. There are mandatory things -- like adding DAHS verification to the test files and creating test numbers -- that are new in ECMPS. I think it would be helpful to have a list of differences between EDR and ECMPS reporting. It is difficult to determine what has changed.

We are working on a document that shows the changes to Part 75. As far as test numbering changes, we have provided information throughout this transition process about this and the other major changes happening as part of the reengineering effort. There are resource issues that stop us from guaranteeing more documentation.

Q20: On check specifications, will the pseudo code for the check specifications be displayed in all future versions of the Client Tool? One version that was released did not contain the pseudo code.

The pseudo code will always be displayed in the Client Tool. We removed them at one point because of changes related to the Clean Air Mercury Rule, but they are currently contained in the Client Tool. The check specifications are also available on the ECMPS Support website.

Q21: When new versions of the Client Tool are released, you sometimes add new check specifications. Is there any way to publish those new checks?

If we add new check specifications, we will publish those in the release notes. In addition, we plan to announce changes to the check specifications prior to the releases next year. At this point, the only new check specifications that are being added have been discussed several times in the past.

Q22: Can the Feedback Reports be consolidated so that I do not receive three Feedback Reports for each of the three data types -- monitoring plan, QA, and emissions -- for a single unit?

The design of ECMPS requires that each submission generates a Feedback Report.

Q23: Are you planning to allow vendors, consultants, and other industry users to have access to the data without being assigned as an agent? Right now, some of our clients might not want to assign me as an agent, but in order to provide guidance, I would need to be an agent to see their data.

This is an ongoing topic of discussion at EPA.

Q24: For historic resubmissions, how do I resubmit previously submitted monitoring plan and QA data?

First of all, the only reason you would submit with critical errors would be to get your emissions data in before the deadline. If you do submit monitoring plan and/or QA data with critical errors, then you can resubmit the data during the 30 day resubmission window. If you discover an error in your QA data that you reported and you need to replace that data, you need to contact EPA. We can then ensure that the wrong test is removed properly and determine if there have been any subsequent emissions submissions. If the incorrect QA data impacted your emissions data, we will ask you to resubmit your emissions, as well.

Basically, when you need to make those types of resubmissions, you need to contact technical support and copy your EPA analyst. We need to resolve these issues on a case-by-case basis.

Q25: Can you talk about the limitations of the "management" agents in the CAMD Business System?

Source management agents can edit the data in the CAMD Business System with the same authority as a Designated Representative. Keep in mind that for anything related to submitting Part 75 data, the representative has to create ECMPS-specific agents. Source management, general account, and allowance transfer agents cannot submit data through ECMPS.

Q26: Who will receive the announcement email about the Q4 release of the Client Tool?

The person who registered to transition to ECMPS in Q4 will receive the announcement email around December 17.

Q27: Some of the errors triggered in the monitoring plan in ECMPS are not actually issues with new information required under the 2008 rule, but with legacy data. It is my understanding that the production version is going to be revised so that old data will no longer trigger errors?

Yes. In the Q4 release of the Client Tool, data will not be checked back to January 1, 2003. The new evaluation period will start on January 1, 2008.

Q28: So if you are missing a probe serial number for a probe that is no longer in use, you will not receive an error?

We never wanted people to add probe components historically, and those instructions have been revised.

Q29: So if you have an error caused by overlapping dates due to the fact that you did not report an end hour in your historical data, then you will no longer receive that error?

Correct.

Q30: The change to the evaluation period will be implemented in the December 17, 2008 release of the Client Tool?

Correct. The version to be released for the fourth quarter of 2008 will eliminate some historical data errors. The evaluation period will begin on January 1, 2008. Historical unit program dates are still required to be accurate.

Q31: Will this evaluation period change to January 1, 2008 affect rotating fuel flowmeter errors?

You do not need to go back and change the start and end dates for fuel flowmeters. You simply add end dates for any components that are no longer in use when you start using ECMPS. Any active components do not need end dates. You can add end dates going forward as you rotate active and inactive fuel flowmeters into service.

Q32: For people who are testing with the current version of the Client Tool that checks historical data, what is the guidance for getting around these errors without having to fix all of that data?

Testers can determine how they would like to spend their time. They can still test all of their data and ignore the historical data errors. It is possible to identify and correct critical errors that will not be affected by the change to the evaluation period. It is also important to note that historical monitoring plan data that affects current emissions data must be corrected.

Q33: If I fix my monitoring plan errors in the testing environment and then import these data into the production environment, this will not fix all of my errors in production because the Client Tool merges the monitoring plan data. Could I purge the monitoring plan data in my Client Tool and then import the clean data?

No. The Client Tool database will never be empty because of the way synchronization works. The moment you login, the Client Tool will download the most current monitoring plan from the EPA Host System. That is why we recommend that you save a copy of your monitoring plan printout report from the testing environment so that when you import your corrected data into the production environment, you can use the monitoring plan printout report to identify any problems that were introduced as a result of merging the monitoring plan data.

Q34: With the Retrieve functionality, data are not completely replaced in your Client Tool?

Retrieve is also a merge, but synchronization replaces data. If Person A submits a monitoring plan, and Person B syncs his/her Client Tool with the Host system, Person B's monitoring plan will be replaced with what Person A submitted. That happens when two people with two different databases are working with the same monitoring plan data.

Q35: I am not a fan of exporting data from the testing environment and importing it into the production version. Because of the merge process, you are forced to go through every tab manually to make sure that there are no duplicate records. Is the revision to the evaluation period in fourth quarter going to alleviate any of these errors?

It depends. Changing the evaluation period will eliminate a lot of errors, but not all of them. The first time that you submit a monitoring plan through ECMPS you will have to check carefully all of the data for errors, either going tab by tab, or by using the monitoring plan evaluation report to identify the errors. Once these changes have been made the first time, the syncing process will ensure that they never have to be made again.

Q36: Purging is on a facility basis, not a unit basis, correct?

Yes. Currently, you can only purge data by data type and facility. The plan is to make the purging process more refined.

Q37: Are your SQL table definitions available?

Yes. The SQL database design documents are posted on EPA's website. We need to make some small updates, but the basics are still the same.

Q38: Where can I find the subscriber agreement and where do I send it after I have signed it?

There are subscriber agreements in the meeting folder and you can send them by mail or FedEx to EPA. We will accept Xeroxed copies of the form as long as the signature is original. In addition, the subscriber agreement form will be posted on the EPA website soon.

Q39: Do Retrieve agents have to fill out a subscriber agreement?

Anyone who has a user name and password for ECMPS and/or the CAMD Business System, including retrieve-only agents, needs to sign a subscriber agreement.

Q40: Will our passwords stay the same?

Yes.

Q41: The third bullet on the subscriber agreement is, "I agree to maintain an email account; if any email sent to me by U.S. EPA is returned as undeliverable, I will explain why this occurred when requested by U.S. EPA." What if we do not receive an email because of spam filters? This seems like an open statement….

We basically need an email address on file. If you change your email address, you should update your profile in the CAMD Business System.

Q42: Given the more onerous login requirements for CROMERR, are there plans to change the requirement to login to the Evaluate module every time?

The only time you will be required to answer CROMERR challenge questions in ECMPS is when you are submitting data. You also have the option to "work offline" when you enter the Evaluate module. Unless you have any reason to believe that there are changes being made to your monitoring plan outside of your Client Tool, then there is no reason to login and synchronize when you enter the Evaluate module.

Q43: If I'm not a submit agent, why would I need to fill out the wet-ink subscriber agreement?

This gives you access to the CAMD Business System, even if you just need to update your personal information in the CAMD Business System.

Q44: When do you have to answer the challenge questions required by CROMERR?

You have to answer CROMERR challenge questions when you submit data to the EPA via the Client Tool.

Q45: In regards to the program list, for those facilities that are going to begin reporting under the Regional Greenhouse Gas Initiative (RGGI) starting next year, although it is not an EPA-supported program, is it going to be added to the program list in ECMPS?

Yes. The program code for the RGGI is being loaded on the EPA Host System and will show up automatically in your Client Tool with the Q4 2008 release. In addition, the changes to the emissions XML schema, which I mentioned earlier, are related to RGGI. If you are not affected by that program, you can use the existing XML schema.

Q46: On the detailed emissions data, is there a reason why all of the monitoring availabilities are listed except "O_2"?

We will investigate this.

Q47: When we queue up more than two files to submit, the second file is never submitted. Is this a known issue?

Yes. This is listed on our "Known Issues" page and will be corrected in the Q4 version of the Client Tool.

Q48: After you submit, how long are Feedback Reports saved in the Client Tool? I know that the email containing the Feedback Report is considered the official report.

The Feedback Reports are stored in your local Client Tool database until you replace the database or purge your database. We suggest saving a copy of your Feedback Reports in another location as a backup in your own archives.

Q49: DAHS software vendors are evaluating our resources right now to determine if we have enough resources in place going into next year. In order to get a better gauge of how much we can rely on you, can you help us understand how many resources you have put into preparing for the switchover to ECMPS?

To date, a lot of resources have been put into support for testing with the Client Tool Preview. People who have tested have a much better experience with the production version. We are staffing up in terms of making technical support available. During submission periods, we make support our priority, as much as we can plan for it. We are trying to provide training materials in the form of tutorials, frequently asked questions, and other resources that we have discussed today.

Q50: How many staff do you have that provide technical support?

We had about five full time people handling production support in October 2008.

Q51: An analyst at EPA has told me that he is not "up to speed" on ECMPS. What is that process and how is that coming for CAMD?

The analysts at CAMD are working with Matt Boze to come up to speed. As of this quarter, they will begin receiving the Feedback Reports, which should help integrate them more into this process. Up to this point, Matt has been handling everything because of the limited number of sources. In addition, all of the analysts can refer to Matt Boze if they have questions.

Q52: One of the potential problems is that we are going through a huge change with the format and at the very same time, we are adding more checks. Is there any thought to turning off as many of the checks as you reasonably can in order to get rid of those errors that do not really matter?

This would only delay finding the errors until later, which would require resubmissions.

Q53: As far as test IDs, there is a requirement to come up with unique test IDs. Rather than requiring individual users to create these unique test numbers, could the ECMPS system generate those?

The DAHS should be able to create unique test IDs.

Q54: How do I know that the monitoring plan in my Client Tool has not been changed by someone else on the same computer?

There is no way to tell if a monitoring plan has been changed by someone else using your computer except by comparing a monitoring plan printout report from before and after. The sync process is designed to handle any changes that are submitted to the EPA Host

System. If changes are made to the monitoring plan, then the Client Tool will indicate that the monitoring plan needs to be evaluated. If Person A makes a change and submits it to the EPA Host System, when Person B logs in, a copy of Person A's monitoring plan is automatically downloaded into Person B's Client Tool database. In addition, if the monitoring plan in your local Client Tool matches the monitoring plan on the EPA Host System, then the Client Tool will prevent you from submitting that monitoring plan.

Q55: Can you please explain how the QA test history data is automatically downloaded into the Client Tool, which allows two separate people to submit QA and emissions data?

If you have a business process that involves different people submitting QA and emissions data, then your Client Tool will automatically ensure that the database contains the necessary QA test data to allow emission submissions. Once a QA test has been submitted, anyone who logs into the EPA Host System for that unit will automatically receive the necessary test history data. If Person A submits a QA test and Person B wants to submit the emissions data that depend on that QA test, Person B does not need to retrieve the QA test that Person A submitted.

Q56: Can you please go back to the slide about resubmitting data?

In 2008, if you have transitioned to ECMPS, you need to resubmit 2008 data via ECMPS. If you need to resubmit emissions data from 2007 and earlier, you must use the ETS-FTP system.

If you have not transitioned to ECMPS in 2008, then you use ETS-FTP for all resubmissions.

In 2009, all sources will be required to use ECMPS and all resubmissions for all years will have to be submitted via ECMPS.

Q57: So if I transition to ECMPS during 2008 then I do not have to resubmit any data for earlier quarters of data that were not submitted via ECMPS?

Correct. Early on in this process, we thought about forcing people transitioning to ECMPS to resubmit all data from 2008 via ECMPS so that everything was in the XML format. We determined about a year ago that this was no longer necessary. If you are transitioning to ECMPS for the fourth quarter of 2008, you do not have to resubmit any data from first, second, or third quarter. You only need to resubmit incorrect data.

Q58: On emissions data, I have been told that EPA is tightening up certain tolerances. Are these going to be considered critical errors, in light of rounding issues?

Rounding issues continue to be a problem in both the legacy systems and in ECMPS. Some of the tolerances have been changed because they were fairly wide, but this took place in the first versions of ECMPS that were released -- even the beta and gamma testing versions had these new tolerances. We have the ability to change tolerances in future versions, but they are stable right now.

Tolerances can be viewed in the check specification documents -- specifically, the "Cross Check Tables."

Q59: If there is an administrative override on my monitoring plan evaluation report, will it always be there?

If we have performed an administrative override of an evaluation error, it could remain in your data record forever. If the error was caused by a bug in the software, then the administrative override would be removed when a version of the Client Tool is released that corrects that bug. If the override was due to incorrectly reported data -- for example, a QA test that was performed incorrectly -- and the EPA allowed the test by performing an administrative override, then that override would remain in the data forever, with a comment from the EPA analyst who allowed the test to be used for compliance.

Q60: What type of availability should we expect from the EPA Host System? Recently, the EPA Host System was down for four days.

We expect constant availability, but we do not have total control over the systems. We try to convey the importance of reporting periods to the people in charge of our data system servers. We publicize any scheduled outages in advance on the ECMPS Support Website (ecmps.pqa.com).

Q61: Will the memory leaks be resolved in the next release?

That is a technical question that could refer to lots of things, so please direct it to technical support.

Q62: Some Microsoft software patches do not work well with the Client Tool. Are you planning to keep us informed when that is a possibility?

We have increased our efforts to post known issues as quickly as possible on the ECMPS Support Website (ecmps.pqa.com). Please let us know about these types of problems as soon as possible. In addition, we have stopped including the Microsoft .NET 3.5 installation as part of the Client Tool installation because it is an operating system component. This is indicated in the revised minimum system requirements.