New Approach for 2017 Nonpoint NEI Development

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Outline

- Origin & proposed 2017 Nonpoint inventory development process
- Wagon Wheel (WW) & non-WW components to Nonpoint inventory
- 2017 Nonpoint NEI approach
 - 3+ step staggered schedule
 - Goals vs. reality of WW module development
 - 2017 timeline vs 2014
 - New Nonpoint Survey and options for SLT submittals
- Way too-early summary of pain points and successes
- The future, 2020 NEI and beyond



Origin: Nonpoint LEAN Event November 2016

- Previous Nonpoint NEI Development Process was not tenable
- Multiple versions of tools, each in its own program
- Not holding to milestones
- Lacking consistent, timely and robust methodology documentation
- Lack of State/Local/Tribe (SLT) inputs
- Lack of SLT review time
- Crude and hard to interpret Nonpoint Survey
- Resulted in multiple 2014 Nonpoint "Final" versions
- Late documentation
- Looming question: What is more important, a timely or mostusable/quality Nonpoint inventory?

Proposed Solutions for 2017 NEI

- Early coordination and buy-in on methods and implementation
 - 2017 NEI Plan w/ clear and realistic milestones
 - Robust Nonpoint Emissions Methodology and Operation instructions (NEMO) for each EPA nonpoint tool

Streamline communications

- SharePoint organized & simplified Nonpoint Survey
- Continued Nonpoint Method Advisory (NOMAD) committee monthly calls and additional webinars on tools
- Regular updates, monthly Skype meetings, recorded trainings

Streamline the Inventory Development Process

- Centralized database tool for as many nonpoint processes as possible → Wagon Wheel
- Utilize activity and other tool inputs from SLTs
- Providing formats, schedule and Quality Assurance (QA) procedures

Implemented Process Changes for 2017 NEI

- An earlier "final" Nonpoint NEI
 - We planned an approximate 6-month delay in "version 1" public release because this should be the final nonpoint NEI
 - Other data categories available in EIS earlier
- EPA runs final version of WW tool
 - Version control/tracking and resources are saved
 - SLTs can also run tools to "test" assumptions and updated activity data
 - Steps for SLTs to load their inputs and run WW not provided

Wagon Wheel

- Central Microsoft® Access® database
- Uses single interface for multiple source categories/tools/modules
 - Emission factors
 - Emissions Inventory System (EIS) codes: state-county (FIPS) codes, SCCs, pollutants
 - Activity data: e.g., State Energy Data System (SEDS), County Business Patterns, Point-Nonpoint SCC cross-walk
- SLTs can modify activity data and assumptions
 - Input Templates provided by tool and also for "centralized" data
 - SLTs can review default inputs and if desired, selectively add their own
 - SLT inputs become absorbed in WW for NEI
- NEMOs accompany Input Templates and WW



Wagon Wheel Categories

Category 1

- Ag Pesticides
- Ag Tilling
- Asphalt Paving
- Av Gas Distribution I & II
- Composting
- Construction Dust
- Mining & Quarrying
- Open Burning Residential Household Waste
- Open Burning Leaf & Brush Yard Waste
- Residential Charcoal Grilling
- Residential Construction Dust
- Residential Non-wood Heating
- Road Construction Dust

Category 2A

- Commercial Cooking
- Human & Animal Cremation
- Landfills (working-face Hg)
- Other Nonpoint Hg

Category 2B

- Ag Animal Dust
- Open Burning Land Clearing Debris
- Road Dust

Category 3

- Industrial & Commercial/Institutional (ICI) Fuel Combustion
- Publicly-Owned Treatment Works (POTWs)
- Residential Wood Combustion (RWC)
- Solvents
- Stage I Gas Distribution

Non-Wagon Wheel Categories

- Development schedule is sector-specific (not Category 1, 2 or 3)
- Separate Tools
 - Oil & Gas Production and Exploration
- Stand-alone EPA datasets
 - Agricultural livestock waste
 - Agricultural fertilizer application
 - Agricultural field burning
 - Biogenics
 - In-flight aircraft (Pb only)
 - Portable fuel containers
 - Commercial marine vessels
 - Locomotives

3-Track Staggered-Schedule Approach: Category 1

- WW tools with minimal or no methodology changes
- No point inventory reconciliation
- Do not update activity until year-2017 is available
- Source categories generally regarded as in "good shape", or not considered high-priority based on stakeholder feedback
- Goal for NEMOs and SLT-reviewed Input Templates
 - April 30, 2018
- Reality
 - NEMOS: Feb May 2018
 - Reviewed Input Templates: June 2018 –some modified since



3-Track Staggered-Schedule Approach: Category 2

- Significant method changes and no point subtraction
 - No point reconciliation
 - Collaboration needed to discuss tool improvements
 - Eventually split into "2a" and "2b" tools because of shutdown/resources issues
- Goal for NEMOs and SLT-reviewed Input Templates
 - Category 2a: 12/31/2018
 - Category 2b: 3/15/2019
- Reality
 - NEMOS: 9/20/2018 (2a), 12/4/2018 (2b)
 - Reviewed Input Templates: December 2018 March 2019
- Note: As of mid-June 2019, most Category 1 & 2 Input Templates have been updated with latest available default activity data

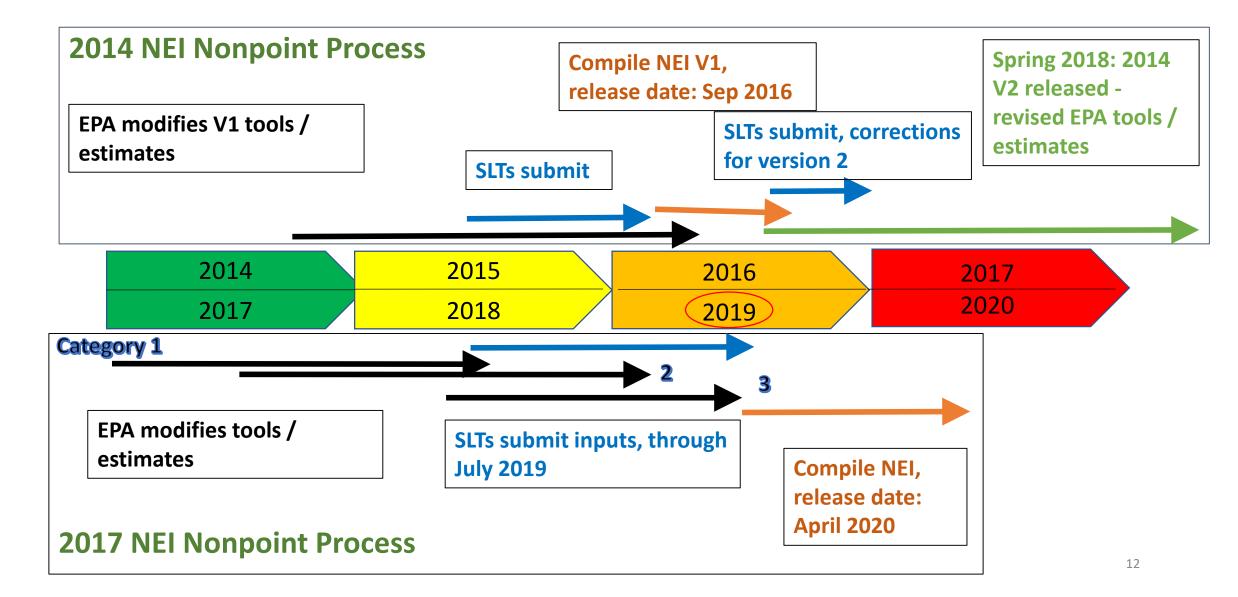


3-Track Staggered-Schedule Approach: Category 3

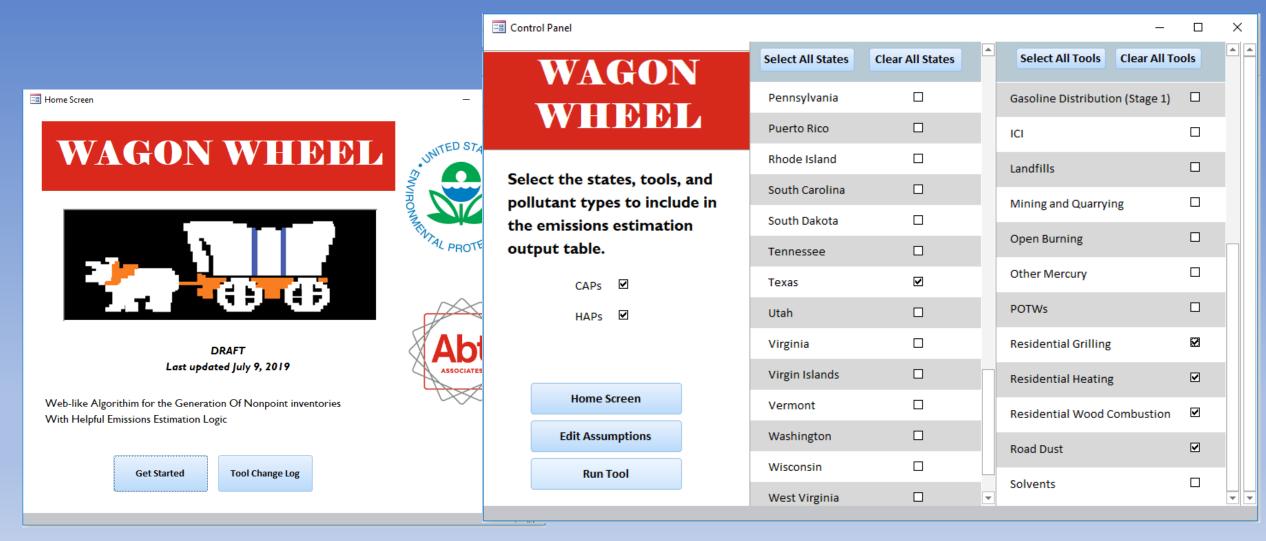
- Point source subtraction needed –except for RWC
 - Emissions for most Cat-3 tools
 - Throughput (activity) data for ICI tool
- Varying degrees of methodology changes
 - Significant: ICI, RWC
 - Limited: solvents, gasoline distribution stage 1, POTWs
- Goal for NEMOs and SLT-reviewed Input Templates
 - Draft versions: 2/28/2019
 - SLT-reviewed input templates and NEMOs: 6/30/2019
- Reality
 - Draft versions: May June 2019
 - SLT-reviewed input templates and NEMOs: June 2019
- Note: Plan is to post final Cat-3 tools and estimates –reflecting SLT-submitted inputs (including point data) by 8/31/2019



Snapshot of 2017 vs 2014 Nonpoint Timelines



Screenshot of Wagon Wheel Tool



Input Template

1.0

1.1

1.3

1.4

1.5

01/12/2018

05/10/2019

06/09/2019

06/17/2019

06/21/2019

07/08/2019

Initial draft of document.

Updated with latest activity data. Added emissions factors for Bin 2 and 3 tools.

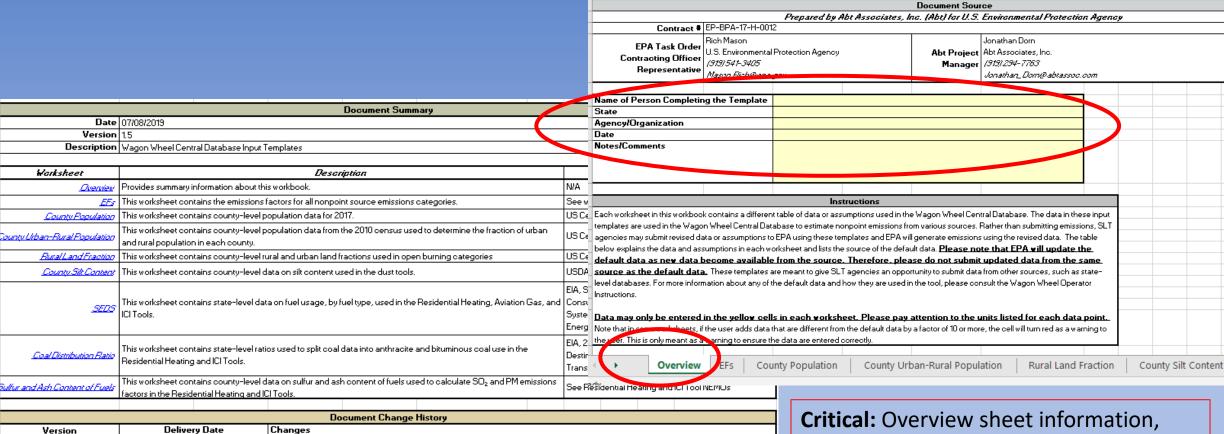
Updated emissions factor for Solvents - Dry Cleaning with latest data from Freedonia

Corrected minor error for units for natural gas consumption in SEDS sheet; units should be E6FT3

Added emissions factor for tetrachloroethylen (perc) for Solvents - Dry Cleaning.

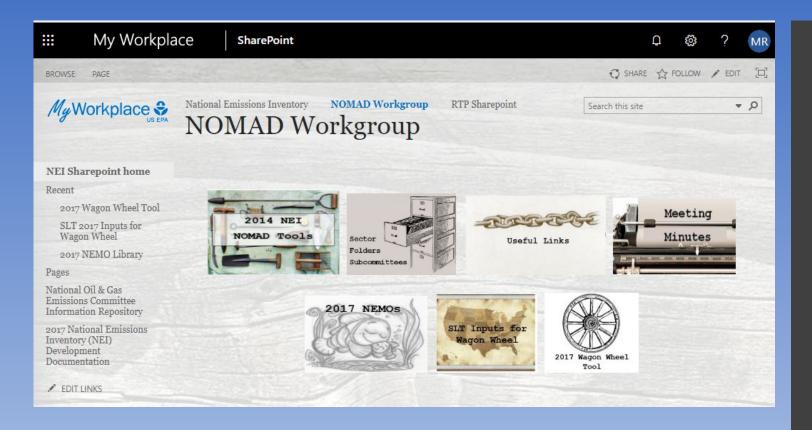
Added emissions factors for Stage I Gasoline Distribution.

Added emissions factors for Residential Wood Combustion.



Wagon Wheel Central Database Input Templates

Critical: Overview sheet information, necessary to ensure edits (over-ride EPA default data) are confined to the SLT submitting the template



Screenshot of NOMAD SharePoint Site

- Sector Folder Subcommittees
 - Repository for data analysis products and/or draft data for each tool/sector (e.g., ICI, Ag Burning)
 - Year 2017 and 2014 sub-folders
- Meeting Minutes
 - NOMAD Skype call notes and recordings
- 2017 NEMOs
 - NEMOs, references, and SLT comments on draft NEMOs
 - Broken out into "Bins" (Categories)
- SLT Inputs for Wagon Wheel: key working folder for SLTs with following subfolders:
 - Blank templates for download
 - SLT-completed (and renamed) templates that will be loaded into final WW
 - Miscellaneous inputs that are not WW input templates
- 2017 Wagon Wheel Tool
 - Current version of the WW and archive versions

New Nonpoint Selection Process: Option Group/ Option Set (OGOS)

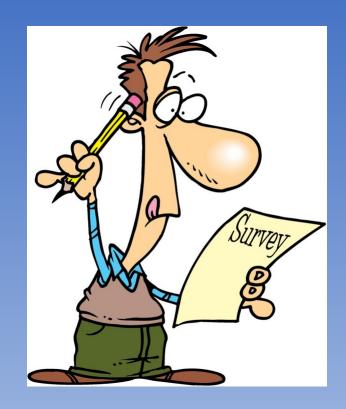
- In SCC reference table, used to prevent potential double-counting when blending EPA and SLT submittals into NEI: issue of "general" vs. morespecific SCC processes
- Less EPA and SLT data tagging
- OGOS example
 - EPA calculates numerous fugitive processes (connectors, flanges, valves, etc)
 - SLT submits "all processes"
 - Only SLT (higher-ranking in selection hierarchy) data will be selected in NEI
- Refer to Appendices 4 & 6 in the <u>2017 NEI Plan</u>





New Nonpoint Survey

- First introduced for the 2014 NEI, has been streamlined for the 2017 NEI
- Rely on SLT inventory submitters for each Nonpoint source grouping/SCC to indicate
 - Yes, supplement with EPA data
 - No:
 - I do not have this source
 - It is included in my point inventory
 - My agency uses different SCCs
 - My inventory is complete; it does not need to be supplemented
 - Yes, but, supplement only for missing pollutants at my reported counties or Tribe



Options for Submitting Data to NEI

- Business rules are laid out in the 2017 NEI Plan and Addendum
- Regardless of option, must complete the Nonpoint Survey, then:
 - Submit Input Templates for Categories in Wagon Wheel via SharePoint

Accept EPA estimates

SLT submits Inputs Templates, or nothing

FPA generates estimates from default and/or SLT activity data

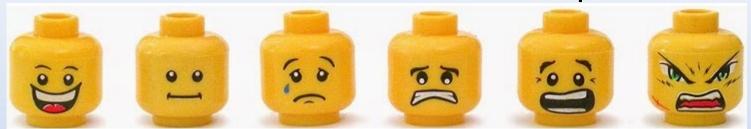
• Or, submit emissions using your own method

Submit emissions

SLT generates emissions using WW or their own tools/methods

SLT submits emissions to EIS

Pain Points in New 2017 Development Process



- Timeliness: uncontrollable
 - Initial resources needed earlier + government shutdown (esp. RWC)
 - Final activity data, including vehicle miles traveled & point from SLTs, do not mesh with existing reporting rule deadlines
 - Resulting resource planning challenges for several agencies: new deadlines
- Timeliness: more-controllable
 - Late comments, review, errors identified caused > 1 round planned review
 - Earlier SLT review/feedback on NEI Plan, NOMAD notes, tools needed
 - Draft emissions not provided with draft NEMOs and templates
 - Lack of 1-stop doc "how-to" instructions for SLT submittal and QA until recently
- Limitations & steep learning curve (EPA & SLTs) for the process
 - SharePoint process: checking out blank templates, upload with overview info
 - Lack of ability for SLTs to "test" WW with their inputs

Notable Successes in New 2017 Development Process

Communication

- Earlier engagement between SLTs and EPA
- Feedback from mass-emails, recorded NOMAD Skype meetings

Improved transparency

- Earlier release of proposed methodologies (NEMOs)
- Provided much of default activity data before submittal deadline (Input Templates)
- Many sector estimates/documentation done earlier this cycle
- Ability to review SLT-submitted comments and inputs before submittal deadline

Streamlined approach

- Late-arriving activity data more easily absorbed thanks to WW
- Version tracking via templates and WW

Next Steps: 2020 NEI and beyond

- Evaluate as a large group, the pros/cons of the new Nonpoint process
- Work more with ORD to develop and leverage testing programs to support inventory development
- Work with SLTs and others on identifying key sectors for improvement
 - Missing sources that need methods: e.g., ag silage
 - Discuss which existing tools deemed not suitable to SLTs for 2017 (e.g., ICI, RWC, Solvents for some)
 - Improve understanding of agricultural livestock model code
 - Emission factor work
- Web-based pilot for a sector → test prior to 2020 NEI (resources permitting)
 - Work to absorb much of Wagon Wheel/Input Templates directly into EIS
- Absorb, document and greatly-refine components of PM Augmentation Tool into EIS
 - Use similar pollutant-ratio approach already in place (e.g., HAP augmentation from CAPs)
 - Obtain references for all SCC mappings, with and without controls
 - Create easy-to-read PM component factors by SCC, much like HAP augmentation

2017 Nonpoint NEI Resources

- Numerous online <u>Air Emissions Inventory Training</u> courses
 - New <u>Wagon Wheel</u> Approach
 - New <u>Nonpoint Survey</u>
 - New Nonpoint NEI Process and QA
- 2017 NEI Plan and Addendum
- NOMAD SharePoint site
- Recent "Cheat Sheet" for SLT submittal development
- Periodic (every 2-4 weeks) email updates on NEI development

Nonpoint: Points of Contact

Rich Mason

Ag Tilling

Biogenics

Construction Dust

Human & Animal Cremation

ICI Fuel Combustion

Mercury, including working-face landfills

Mining & Quarrying

PFCs

Residential nonwood Heating

Residential Wood
Combustion

Jennifer Snyder

Ag Pesticides

Asphalt Paving

Av Gas Distribution Stage I & II

Backyard BBQs

Commercial Cooking

Composting

Oil & Gas

Open Burning

POTWs

Stage I Gasoline Distribution

Solvents

Tesh Rao

Ag Fertilizer

Ag Field Burning

Ag Livestock Waste

Joe Mangino

Dust from Animal hooves/feet

Road Dust

Laurel Driver

CMV

Locomotives

In-flight Aircraft (Pb)

Wagon Wheel Source

Non-Wagon Wheel Source

