2024 ECMPS Reporting Instructions Review (March 15, 2023)
Transcript

Alright, so let me first of all welcome you all here. There's quite a few more people than I thought were going show up today, but that's good. Either you're interested in what's happening with. With MATS in 2024 or you need something to do on your lunch break. Um. So let me explain kind of what we've done here and um and then I'll step into this, so. As part of the beta development process for what's coming out in 2024, the beta that we're going to be releasing in a couple weeks will basically be the same data, the same reporting that exists in the current production ECMPS, right? We've taken the instructions for that and then based on what we know about the 2024 reporting requirements for MATS and now GNP, we've layered in what we think the data elements should be for reporting of that to take place in 2024. So we've taken the draft Beta instructions, we've added changes to them from data structures and additional text. Of what we think should be coming in for 2024. I did receive some comments from a number of the DAHS winners, which was very helpful. And others, which I've then taken and anonymously put in here as comments into this document, and I'll go through monitoring plan, QA and emissions. So they're all in here and then we're just going step through. I'll kind of talk about what we've done from an approach and we'll talk about the various comments and I'll hopefully have answers. Some of them, some of them I won't. Some of them, I may be asking you all for input or further comments on what we're doing here. OK. I don't have the opportunity because of the way I'm presenting, I can't see the chat. Um, Charlie is nice enough to step on here and kind of keep an eye on the chat for me. And of course, you can always take yourself off mute if you need to do that? Any questions before we get started? My thought was is once we go through this today and I don't know if we'll get through everything in the amount of time that we have. Depending on how much discussion I'm going to start with the monitoring plan, we'll get to the QA section. If we get through all three, great. There's some stuff in here that I don't necessarily have the answers to. I'm sure there's a few things that will come up that I'll have to. Um, defer back to OAQPS for more information, but we'll go ahead and then we'll put our responses to comments plus anything else that you all send in. And I'll go ahead and publish these a second time, the same place where they are now updated with the same with comments and responses. And it would be kind of a working document. If you see anything or anything that you want to make additional comments on, go ahead, grab that copy of the word file, put a comment on it, send it to me, let me know what's going on there. Or you can just send it to me in an e-mail. And that way we'll keep it as kind of a. Running dialog. The goal for all of this is to have these documents finalized by the end of the month. Which then would turn and serve as the high level reporting requirement for really software development requirements for what will come out in 2024 once we finalize these at the end of the month. We're going go gangbusters on trying to start implementing or putting some of these pieces into the beta. So if you go look at the beta right now, they're not there. They're not in the schema. They don't exist. They exist only in this reporting instructions format. But once we get these finalizing the end of the month, we'll go ahead and. Take the next step. And just so everybody knows who, I'll record this and publish this. So this and the transcript. Along with all these documents. Any questions before I get started? You mentioned you took feedback from DAS vendors and industry. Has OAQPS had a chance to review this as well to make sure that things are covered from their perspective? They did we before we published them in December, we met with them and went through things. Great. Thank you. That's not to say we answered every question. I'm sure there's stuff that's going to come up today that I don't know the answer to. Um, where the unique situation in the sense that we didn't, we didn't um, we worked with them on this rule.That's all right, you know? OK, so on their own. All of you people, you're nice people, but we're going keep moving. OK, so we'll start off with kind of the overview of what we've done here. So I did get comments on some of these that the numbering is off on the tables. That's true because of the way they're added. We have not gone through and done the final formatting that ties all of the references in the text to the tables and some of the diagrams need to be updated based on the final data model. So it's not an entirely fully baked thing that you guys are looking at, but it should be enough to get through this discussion today. Alright. Um, from the monitoring plan, just overall what we did? Basically everything in the monitoring plan. The framework is there to support the the PM and the CPMS reporting. Essentially what you're doing is you're adding new systems, new methods for PM and CPMS to support reporting. Yeah. So really it reflects in the monitoring plan is all new codes, but not really any new structures, right? So if you go through here and there's some questions

in here, but overall it shouldn't be um, you know rocket science, right? So I'll just jump to the first comment and this comment here. It shows up as me, that's me anonymizing whoever submitted to me and then the comment after that is me again, but that's essentially. Um, you know our response. So we talked to Q. Could you, could you, could you zoom in on this so you're only seeing one page at a time? Yeah, I'm seeing 2 pages, so it's hard to see. OK, give me a second. To do 1 screen. Now it's big. How's that? Better. Yeah. Little weird the way that's showing, but. Hopefully everybody. Yeah. Can you use the zoom key at the bottom right hand corner of? Microsoft Word and go that route instead. Thank you. I'm going to go back to this print layout and do it that way, and then we'll jump bigger, bigger, bigger. That's much better there. Alright, so it's screaming at me and my 32 inch monitor so hopefully you can see it. So specifically, we go up here we are. We're looking at the MPMC MPF determinations table. This is just so you know where I just jumped to. This is looking specifically at how we would determine this. You know MPC, MPC, MPFR. In this case you report both PM and CPMS is high. This is based on discussions with OAQPS. I don't know the whole underlying logic on it, but the idea is there's not a there. These values don't count, you report them as high. You would not necessarily need to have these records in here. To. To come up with that. So if you go further down, you see that we did put a comment here right here where it says do not report. You know, for HF, PM and TPMS do not report a spam value, right? Does anybody have any questions on that? We did get comments on that, but that's what came from them, so we're going go with it. Right. Chris, we're having some audio and technical difficulties. I'm just telling folks to rejoin the meeting if they can't hear the audio like I couldn't initially. Some people can't see the shared screen. I I don't know what else to say other than, um, try to rejoin the meeting and hit the unmute prompt. I'm not sure why the shared screen is not showing up. I don't know. It's oftentimes I blame everything on teams, you know, but thanks for telling me. Sorry again, this should be recorded in all our rough startups, so if people don't catch this first part, they can go back. Thanks, maybe you can share the share the screen again, if it's easy enough sometimes, yeah, I think I can stop. Let me try, I'll stop sharing. OK so I stopped it and re shared it. Does that help? I mean, I'm good, but I was good before. Yeah, I can see it. OK. Some folks are saying they can see it now. So I think, I think we're good. Sorry about that, Chris. That's OK. Thanks for thanks for letting me know. It's hard enough to follow through this as it is. Alright, so I'm going jump to the next one. This one here. Where are we? We're locked talking specifically in the components. Question came in, is this all for PM's? You know, this is what we have for the analytical principle code for the CPMS component, which is the beta attenuation. I'm not going to read all these here to you. This is what we have. Somebody said, is there anything else that needs to be here? My question goes back to you all. Is there anything else that we're missing? This is what we have as far as codes, what we know to be the universe of CPMS components. Mind you, there's only one or two facilities doing CPMS. So it is this. Chris, this is jumping around, but I got another comment here. Um. There are aspects of the emissions monitoring instructions that refer to PM some span as defined in the monitor plan. How will you see MPs 2.0 recalculate daily calibration error without a span value? I think we I don't know. I think we relied on the basic structure of our current Sims and PM Sims might not work the same way, Chris. That's something we have to work out. Yeah. Again, this is a work in progress as much as we can get it tied up by the end of the month, but that's a good question. I don't know the answer off the top of my head. I mean, originally, you know, we were basing things on injections and things like that. Obviously PM Sims don't use injections, they use filters. So that, again, like Chris said, I think it's a work in progress on things like that, yeah. Anything else on that one? Alright, so I'm going to jump to the next one. What we did here, somebody noticed that we put PM in twice. We had 1:00 PM, we had another PM. What we specifically added in here, it was this PM mats and the CPMS. Someone asked, well what's wrong with the old PM or why did you have PM in your multiple times? The original PM code that's coming in here for this is the PM system type codes was for existing PM systems under the Part 75 monitoring, right? This is not to say this is these codes. The PM maps and the CPMS are specific to PM monitors for part 63, if that makes sense. We wanted to differentiate those records between people who have existing PM systems in our part 75 monitoring world. Questions on that. Bye. I don't have a question on that, but I did want to remind everybody that uh first say the screen is still a little bit hard to see. It's don't know if you can make it bigger, but I'm better individual laptops. If you just put your mouse over the the screen sharing and hit the control and your scroll bar, you can zoom in on your own individual screen. That's better. Thanks. Now it's almost hard for me to see it, but moving on. Any other questions? What? Somebody has their hand raised. Hello. Can you hear me? I can hear you barely. Cindy, you're way down a well somewhere, but go ahead. Right. Would I use both the exist? So if you have an existing PM Sims in your in your monitoring plan for part 75. You would add these codes specific for the PM Part 63

reporting. Either. PM MATS is what you would add. That makes sense. As much as any of it does. Don't rely on the existing if you have an existing PM in your monitoring plan that's been there for years, that does not count for what we're doing here for part 63. But I think Cindy's asking if it's the same equipment for this going be used for the same thing. Does she need to have both or just you? Do away with PM, change it to PM mats, Chris. Um, the PM that's there I think now for part 75 is so that. The system doesn't look for an opacity system, right? And if PM MAT satisfies that, can we just lose the PM designation, change it to PM MATS or do you? I think you were initially saying you should have both, which is going look redundant, but I don't know. I don't know. I think that's a question. We'll need to look at that. Originally we wanted to go through and add this specific for parts of 63, but I I see her point there. I don't want to double count. And make silly data by adding another code for the same piece of equipment. Um. So I'll take that as an action item to go through and see if we don't do something different there. Good comment. Anything more on that? Jump to. Um. All right. This is one that has specific on these to orientate you where we're at, we're talking about qualification type codes, right. And in here we have the LEE qualification, we have these various qualifications, this PM CPMS operating limit qualification, right. Somebody asked if this is a concentration based limit. And my response is that the PM CPMS operating limit is tied to performance test and the associated CPMS data to set the limit, which means the output could be really they gave us the you know, milliamp stack concentration or other all data signal. This is coming from table six of the rule. So my answer to you is it could be any. Or anything really. They say milliamps that concentration or other raw data signal. Take that to mean which what it means, but it should be tied to the performance test, which basically sets that CPMS limit. For the two facilities that are doing CPMS. Does that make sense, what I said? Any questions on that? All right. This is table 8 demonstration method to qualify for monthly fuel sampling for TV codes and descriptions. Will EPA start to enforce this entry? The answer is no plans at this time. I don't even know how we would determine this because we would not necessarily have any codes to trace back and look at what specific 720 hours of. Data were being used. Sure, now the answer is no. And even if we did, I don't think that's necessarily very high on our list of things to check. While we're on the topic of checking regarding all of this new maths data. You know, our first goal, our primary goal is to build the system and make sure that the data can be reported. Some of this data as you can tell, we've never seen it before. We don't know what should be the expected range is what should be what. We're not coming at this from a check heavy standpoint initially. Our first goal is to be able to build the system and get the data in. Once we have some of the data, we'll be talking to people to make sure that we understand what we're looking for and then we can start looking at checks. We have been working on kind of a draft. This list of checks to add which is mainly tied to kind of data integrity, looking at well, does this code even make sense at all? But it doesn't have anything to do with. You know, we think this range should be this. That's not where we're coming from. Um, this is a general comment. You know, why didn't we go down the same path as HD and define PMR and PMR H methods? Umm. Just as a kind of what we did here. We try to do it consistent with some of the stuff that we've done in the past. It's kind of a mix of part 75. It's kind of a mix of, you know, MATS. Um, you know. These two different parameters for CEMS, the PMRH and the PMRE. Here they are. The CPMS shows up as PMPM that actually is in the derived hourly values as opposed to the monitored hourly values. So we're thinking PMA is a monitored hourly value record in the emissions and the CPMS is a derived hourly value record. We'll look more at that in the emissions. There's any questions on that? Component type code descriptions for monitoring span. You know this gets back to that. Are they supposed to be PM options here? Sims or CPMS span scale should be left blank but I do think we have we will have you know component type codes. So we'll need to add those here if I if I understand this correctly. So this is something that we need to change. So that's a good catch there. We're back around. I don't know. We're not. Yeah, we're talking more about ?. We've we're back around. Right. Have we done all of these? Let me check, make sure. Yep. So that's monitoring plan. Like I said, there's not a lot of changes on there. That's based on the comments that we've been given. This will be all published, just like what you've seen here. I'll go through and try and trace down any questions that we have specific that we just talked about. I'll put those as comments. I'll try to get answers to them. This document will be republished with the same, you know, Word document. If you want to add additional comments, send in things from monitoring plan, by all means do so. Any questions before I move to the next document? Try to get this next one open up in the exact same space. So we're going to QA. OK. I want to make it bigger. And jump to the top. So we didn't get as many comments on the first part of this stuff as I thought we would. Let me get. Actually, it's taken me to start and that's not starting where it won't start. So this diagram right here. This ugly spider is not yet updated. So you don't see everything that's represented in the instructions, but it will

be updated once we get to the next once. Well, maybe we can get it updated before I repost, but in the final one it will be. OK, our first meaningful comment, seven day calibration error test. So it says there's no seven day drift check or calibration injection section for PM. Umm, I think that's a good catch. It says, you know, PM drift checks are needed citation. I just, I think that's an oversight on our part. I need to verify that before we, but I'll see if that's true. I'll check with the OAQPS if we're doing PM 7 day drift checks and then we'll put this in here. We'll modify this record to show PM. Any questions on that? So this has to do with our online, offline calibration. I know we've talked about this. I'm pretty sure that. This demonstration is not applicable to PM. So we'll need to add this text here to say no PM stands right this line here. Any questions on that that has specific to do with offline online demonstrations? If you can't do that to validate offline, then obviously you don't need a demonstration, but I will verify that. Are there ATV records required for PS11 test? No. Not that I'm aware of. I'll double check again, but no, that didn't come up on our previous discussions with the OAQPS. OK, this gets into the ACA test reason codes and there's this is an extended discussion and I hope people have comments on this because I am always happy to hear what's really going on. So somebody, multiple people noted that under our test reason codes and descriptions right now we only have the QA. They said we think it should be both a QA and recert. I have no problem with that. I think they're correct. There should be a QA recert code for the ACA test. Then we go into an extended discussion about how we approached the alternative performance spec and the and the two methods and. I've received a couple different comments on this. Um. Discussing the difference between the 10% or the 7.5% based on which alternative performance spec we're using. Um, let me explain our approach and then hopefully people will have questions or comments. Our approach is obviously that needs to be a recert, but for test result code. You haven't aborted, you have a failed. No difference there. You have a passed and then you have a passed APS right? Which is alternate performance spec if you use this past APS right? What we then need to know is which version or flavor of past apps you're using. Our thought was if you say past APS, then you have to turn around and fill out either A21A or 21B, telling me which equation you're using. Right. And that correlates to the 7.5% for 21A or the 10% for the 21B? That was our thought. I as you can see there's a couple other comments here that um. Some people had some different understanding of that. I'm opening the floor comments, questions, discussions because. I think we had it right, but then again, I think what we did might have been confusing to people. If you're on mute or talking, you're on mute. I don't have anything on that, Chris, but um. There's a comment about daily calibrations of PM CEMS. Do they have to and this goes back to online, offline, yeah. Do they have to be done online? I the person saying that I think we're making a statement in the instructions somewhere that they have to be done online. I'm not certain. I'm not certain to go back and verify the the e-mail from Kim. Yeah, Garnet with OAQPS:. We had this discussion. I thought they had to be done online, but. I will verify that. I'm not sure that she actually provided an answer either way, but we'll talk about that, yeah? Yeah. I'll make a note of it. Thank you. Any other questions? I thought there would be more discussion on this. ACA code the way that we've proposed it. Again, I'm not saying we got it right, I'm just saying this was our approach. There may be other understandings of how it works. I was a little bit confused by that, you know, I thought. 2-1A was basically when you were using the reference value, not the emission limit, you know, and then two dash 1B was when you're using the emission limit or the applicable standard. And so I found the way that you guys laid that out to be a bit confusing. I need to look more closely at it, OK? Ohh Chris, Chris. On your computer. Dennis, you're breaking up or kind of? See if you got the echo. Chris and Charlie. Uh-huh. I would suggest that instead of just using pass APS which is which is these questions I the comments they appear to be coming because it's pretty standard accepted under part 75 and this is not part 75 that you you add clarification this is passed 21 A passed 21 B and remove the pass APS to the codes. So we talked about that John. So instead of having the APS formula code. We would just have different flavors the past APS, right? Yeah, we would add two additional. Passed a PS codes, one passed a PS21A, passed a PS21B. Um, the reason we did it this way? And I'm not saying it's right, but the reason we did it this way is so we wouldn't have to mess with the the master passed APS code that applies to all test types, right? Not just. MATS. And so we are trying to kind of you know. We're trying to do, you know, do as few targeted changes as possible without missing some of the master table code tables. Well, someone else is making a similar comment about this APS thing, Chris, and the idea is that you know with our alternative standards you need to qualify to use those in certain instances, and the idea here is that one case is less restrictive than the other. So. I hear what you're saying about keeping the current structure, but. I think that's the heartburn with the APS. Is it you? You you can pass each one. Whichever's least restrictive is the one you're going choose. But anyway, that's what I'm seeing. And.

There was another, but we're taping all this, right? So we'll have a yeah, it's recorded. We'll have the chat recorded as well. Uh, the transcript and everything. OK. There's there's a question about rata traverse starting on page 64. Does not disappear. Not appear to do with actual gas RATAs. But it has to do with flow testing for doing a method 5, so I'm not sure exactly what that's about. But we have it captured, yeah? And if if you have things that you didn't get into this list, by all means send them to me if it's easier. Especially it's easier when it's in writing and you can you know. Clearly stated then trying to you know put on a chat. But yeah there's another comment Chris about do you have a a fail 21A before using 21B or just use either. So that's going back to this past versus passed APS idea. OK. Anyway, it's all there in the chat, OK? Again, this was our approach. I'm not saying it's correct. I don't know that. I guess the question for you all is if we if we did do that like to what John was saying where we went through and put. For me, I don't see the difference between doing this approach versus a passed AP S21A and a past AP S21B. I see those as being the same end result. Um. But. You guys could tell me differently. Here's here's another. Charlie, I was just going say there was another comment in the chat, Chris, that using one approach uses uncorrelated PM data, using the other approach uses correlated PM data. There are two choices. Which one is the alternate? That's a good question. Well, they're both flavors of alternate is what I would characterize it as, but I don't again. It's it's. You know, I can't speak to why you would do correlated versus yeah, I can't speak to why you would choose one or the other. Maybe the idea here though is if you if you code this as the code 21A or 21B, it takes away from confusion about, well which is passed and which is passed after. I think maybe that's what people are trying to get to Chris, OK. Maybe. Sorry, ready. Yeah, one last one more comment. This is. This applies on a run basis anyway. You might have one injection you know you have to use 21B for if you use a zero target. So you know as long as this is done on the. A level test and not the all that resolved, or you you do it in accordance with what you're doing to the linearities will be fine. Well, so this is at the test level. Like the summary level, it's not at the run level. But you could have a combination and one test of using two different equations. Also they have OK. That's helpful to know and not helpful to know. OK. I think we'll need to go look at this section and maybe make some Dennis. Yeah, who's that? I believe. I don't know. But. Yeah, Dennis, Dennis here at Yankee Stadium, I think you're echoing. Maybe turn off your mute or something. OK, uh, I'll we'll, we'll move on. But it's clear that we're missing something here that we didn't get it right. So, uh, I will. We'll go back and look at. This section and hopefully I can better understand what's going on. Differences. Yeah. It's the mic on your laptop tennis, so it's picking you up and then feeding you through again. So you have to mute your mic on your laptop otherwise it's coming in around. But. I'm going keep moving, Dennis, and I know. Give me a call afterwards. If you wanna continue, we can talk. Maybe you can help me understand what we missed here. Um. This is still the same, so I'm going jump to the next one. So here's a comment. Uh, and this may be similar to what we had here before. Yeah, this is another one along the same lines. Where's Dennis? Has his hand up. Do you wanna have him give a shot? Doesn't travel on mute? Go for it. Maybe not, sorry. Tried. So yeah, this is more of that same discussion. Clearly we we're we're missing something here. Alright, so this is a key point. This has to do with the QA cert events and this has to do with, you know, what we've traditionally done for part 75 where we have required test codes and we have sort of event codes, right? Um, somebody said, well, we need to add permutations for PM monitors. If you remember, we didn't do much with the original mercury either, largely because we don't have data. There's not a traditional, you know, part 75 policy manual, section 12 that goes through and details. You change this, this happens. This is how you recertify the system. And So what we have done or tried not to do or stayed out of it in the sense that we don't have accurate. You know, there's not enough out there for us to say you've changed this component, so now here's what you need to do to recertify this system. That documentation doesn't exist. Um, so similar to what we did with Mercury, there's not going to be a lot of. You know, resort events. As far as I changed this piece and then here's my required test code, it doesn't exist. Um. I think there's probably some room for some records to be added, but I don't have the information on it in the sense that you could that that I think is again, I don't have enough to do anything with it. For better or for worse. Couldn't you just start with the requirements in PS11? If you're reinstalling a new PM CEMS, start there. We could add one for PM since we could say, you know, new system initial certification. We can do that. Um. I'll take it as an action item to go see if there's anything that we can do to tighten that up. But again, it's going to be very thin because the documentation doesn't exist, at least not on our side. Any other questions, comments on that? Yeah, that's same comment today. Alright, so. Here we go, quarterly compliance reports. And while we're here, before I jump into the quarterly compliance reports, let me talk a little bit about how this was done and and specifically Appendix E where all of this is coming from. So if you go down into part 63, you look at

Appendix E, There's section one through 13, one through 13 is really everything that we think should be in the quarterly compliance report. Right. Um, when we were originally published it, we missed the deviations part. Thankfully, somebody was actually checking our homework. We put that back in. So that's out there now. That's what we're looking at today. When you look from section 14 through 30, those are the extended quality assurance test data elements. For lack of a better way. Those are all going to be submitted in XML form from ERT, coming in as a bulk submission file in ECMPS. So to say that another way, you'll have and then I'll talk about part 31, which is a PDF. There are three types of reporting that exist under that Appendix E. There's the first sections, one through 13, which is reflected here in the quarterly compliance report. There's 14 through 30. Which is the extended data elements which should be generated in the ERT in XML format, submitted as a bulk file submission similar to you do the math PDF submissions. Now that will exist in the new tool, but it will be submitted as an XML file. And then there's item 31, which is a PDF catchall. So that's what frames this quarterly compliance report. Are there any questions before I step into the quarterly compliance report part? OK, first question came in, you know, why are the 30 day 90 rolling averages reported in the QA rather than the EM? This was done largely. It mirrors what's in the quarterly Compliance Report section or that section of Appendix C, that's why they're here. That's not in the admissions data. We're not going to be trying to recalculate 30 or 90 day rolling averages, especially when there's people who can average across units, across facilities, etcetera. That's not something we're trying to track. So we think it belongs here within. The quarterly compliance report. Somebody noted that the compliance averages show up twice on the diagram. That's correct. We'll fix that. Um. Somebody also here mentioned about the operating limit. Umm, you know that's also that comes from that going back to that CPMS PM, the PM CPMS system that has to do with you establish that PM CPMS limit at the same time you do the performance test, you tie all that data together and that is how that's reflected in the operating limit. Any questions on those two? Chris, did you mention something about ERT in sections 14 through 30 and can you repeat that? Yes. Let me show you here. You should be able to see this screen. I'm not going blow it up, but if you look at this section here. I'm going go all the way to the bottom, hang on for the scrolling. And I'm talking specifically about. This part, Appendix E, Subpart U-1 through 2-3. So here's your compliance report. Data elements. This is exactly where that compliance report comes from, right? Performance stack stuff, sorry. All these records, you'll see them reflected as a direct data element in what we've proposed. Performance test run, data conversion parameters, compliance averages. People are asking why things show up, where they show up. This is where it's coming from. Unit information you should fuel. Now function and then the part that we missed but added back in deviations and monitoring downtime, right, that's all through 13. Then you could go over to 14 through 30, which is all of these reference data elements, right? 17 through 30, I think I've been saying it wrong, but 17 through 39 are all coming in in an XML file, right? That's coming from ERT. I don't have any information other than this should come from the RT. I don't have the reporting instructions for it. That should all be contained in the ERT, right? Hey Chris, can you confirm, can you confirm that it is going to strictly be an export of the ERT file and not something you're going to be coming up with a new schema for to support? Electronic submissions from ??. I cannot. So that is, I can confirm that. We are not doing anything. It doesn't have to. Technically, it does not have to come from ERT. There's nothing in there that says ERT. It strictly says XML format in a format as specified by the administrator, right? The idea there was that would all be generated coming from ERT. Or you could use something else, but that's where this file comes from. So all of that is. Being generated as an XML file that's not going into this JSON, that's correct. How does? I thought the ECMPS 2.0 will only accept Jason. It will accept Jason for anything starting third one through 13 and then the other stuff in the PM hourly reporting. But the. The the data elements 14 through 30 will have to be imported into 2.0 as well, correct? They will be imported as a XML file. They will not be. It's not like a JSON file where you import it and you can see the data elements and manipulate them on the screen. They're imported strictly as like how you submit a PDF file now. Your Max PDF submission, that's exactly it. You'll go in, you'll say I'm submitting this, you know. 14 through 29 data elements and XML file for my facility, which are my extended, you know, test data elements. It'll show up there as a file that you have named. Whatever you name, it will verify that it's an XML file and that will then be sent over to sedri. Um, so it goes all the way down? 2:30 and then 31 is the catch all PDF file. Right. Which is other information for each test or test series that could be anything in a PDF format. So if you're familiar with the existing CMS where we have this math PDF submission, that functionality will exist except for will now also have a PDF to cover this section 31, and I'll have a XML file type that you can also throw in there to cover 14 through 30. OK. Yes, I'm familiar with it. Thank you. OK. So now I'm going to jump back to our regularly scheduled program. Feel free to

ask me more questions, I don't have answers on some of it as to the why, but that's what's done so. I'm going try and get some. I I don't know enough about what's going on with the ERT as far as how that file is constructed. It's not required to use ERT, but the XML file itself is supposed to be the same format. If that makes sense. Any questions? That so this structure is pretty ugly, but it's again, it's based off of what I was just showing you. A bunch of people noted that the table references are wrong. Yes, you're correct. All the table, a lot of the table references as far as in the text versus the actual table numbers are incorrect. We need to go through is our final formatting correct? All of that. Hopefully most of the places you can see when it says Table 82 below what we mean is table 81. But just if you have questions, feel free to ask, but we're going to try and get that stuff cleaned up. So someone here asked, under the parameter codes, would PM CPMS need to be configured differently? The answer is no, because PM CPMS is just a different flavor of PM monitoring and so it would show up under PM just like the PM sends what. Any questions on that? Again, incorrect table references. Chris, I guess you know the whole concept. Of like that direct XML import and it's not really going to be integrated in any way. I find that a little confusing and in reality a lot of those summary records. Couldn't they be built or tied back to what is entered into the detailed records? Like if we're going to have two different systems here, then it seems like it's a lot of manual entry into the summary data records. That that will be in the JSON report. Yeah. I I don't disagree with you out again. I'm just, I'm telling you what's in the rule at this point. That's why I wanted to start with the rule. I'm sorry I don't have a better answer at that point though. Um. Moving on, we're talking specifically about we you know. Someone said that the QA parameters overview. This implies that the record is only submitted for ??? testing using Sorbent trap system. Umm. I don't disagree with this comment. They're basically saying that we need to clarify this section and clean it up so that it makes sense for other parameter types. Because I think it was originally pulled from the LEE reporting and it really needs to be genericized for reporting of other things. That's a valid comment. Any questions on that? Um, compliance averages. And there are some stuff down here under the 30 day and the 90 day that I wanna get to. Um. Someone said we'd prefer not to be reported for every calendar day. Just not just. I don't really understand this. They want to report for every calendar day, but not just operating days. I don't necessarily understand this comment in the sense how do you have a? Compliance average for a non operating day necessarily as far as a record? Yeah, that's, that's, that's not my comment, Chris, but maybe the presumption is that it would be a static value until you got to the next operating day. So it doesn't, it doesn't jive with how we've structured the compliance reports in the sense that you're reporting. You know, averages, so. If somebody to the person who sent this comment and I know who you are, but if you have more information to provide here that would help me understand kind of what we're getting at. The assumption was that this was maybe going to be moved over to the emission file anyway and no different than reporting offline averages for non operating hourly records. You'd report one record for every day even if that day was not considered an operating day and numbers wouldn't be changing. So Jason was right, it was kind of. Static number until the next operating day. So you think you guys would report a compliance average record for every single day? Data acquisition systems generate a record for every day, no matter what. We just code it whether it's online or offline. So you know it's not, it's not. You know a big deal to filter out non operating days. Yeah, yeah, I hear it's easier to easier to dump, you know, 90 days rather than filter. Yeah. But it's not that big of a deal if it's going to be kept here. But again, I I'd still like to see everything over the emissions file. So when we talk about them, let's, let's talk about this for a second. I mean, I'm not saying that we can change it in the sense that I think it belongs here just because I I didn't want to muck up the emissions records with some of this stuff. Um. But. You know. We could do that. We could peel this piece off this whole compliance report, put it in the emissions data, right. It would fit over there. You wouldn't have the ability to edit that data in EMS because right now we don't have the ability to edit the missions files in ECMPS. So that would mean that the DOS vendors would be, you would have it all as far as putting everything in ECMPS or in the in the emissions file. Um. So that's a thought. You know. But I would encourage the you know the offer to I'll defer to industry on that. I'm yeah you guys should think about it because once we set it, it's set right like we're going if we do it we do it. But that means the compliance report sits solely in the admissions section. And it has to be brought in from the DAHS, generated in the DAHS you know, and imported from there. I don't disagree with you that all a lot of the values are. They're all coming from the emissions file. And let me clarify, I'm strictly talking about the compliance averages. I'm not talking about you know and possibly the deviations, but not any of that other stuff. So if your intent is to keep you know one through 13 and one consolidated tight knit. Package, then by all means leave it here, OK, because that's my intent, is to keep it. OK, you know this diagram, you know, and all it's. Work is to keep this entire set of data. Coming in in the in the QA file, I would not

want to split these pieces off and have some of them coming in emissions and have some of them coming in under QA. Chris, it isn't including all this MATS compliance data. In the QA file. Isn't that putting some level of risk at? All the non MATS universe for delaying their actual ability to report via ECS 2.0. And shouldn't this possibly be embedded in quarterly MATS compliance type file, yeah. So. My thought is we did not want to go down the path of creating a force submission type. The overhead on that is not worth it in our opinion. I don't see it as a risk to the existing QA stuff. And let me explain why, because the way it works now, yes, the file structure is one piece, but I can go in and I can submit a RATAA if it applies to me. That's like saying having a rata test is is holding up somebody who's doing only Appendix D, for example, right? They can submit their Appendix D stuff in their QA file, no problem. They don't have to worry about what's going on with RATA. Right. So this test type or this structure gets submitted in a QA file with one or more other pieces of QA data just like you do now. And either you use it or you don't. The structure may you know is a concern maybe but I don't see it as is that big of a concern if that makes sense John it does. I just, I mean I hear you. I hear you. If we were trying to do this as clean as we could we you know and we and we. Just wanted to build our own system specific to math. I think we could have done that, but I didn't. I did not want to create a fourth file type. OK. Any other I we're at 2 minutes on time. I think I can go over if you want, or we can post what we have and reconvene. Those are your choices. I blocked this to go over for me, so I'm fine to keep rolling if people think this is useful. You go on the parties all here, OK, so. Um. Going back at this, let me go down here and show you what's. Um, again, table references. Back down to this time for the scrolling. We here's where we were. So these examples, we got a number of questions on these examples. Some people said they wanted more examples. Frankly, I hate the examples. I don't like the fact that we've included these examples. But. Again, there's a question here. You know about how some of the content of the way we wrote some of this out in the examples? Um. And there's a number I know that people had questions. There's another couple more comments on. On these examples that we received and my question for you all is are they useful? Maybe if they're correct. Otherwise I think they're more problematic than anything. That I'm asking for comment on that. So Chris, the compliance report is going to be submitted as a QA file, correct? Forgive me for my ignorance. So question came in about, well what if we submit the QA file mid quarter? And I'm assuming this is the compliance average, the compliance report? Will there be an issue if the compliance averages are not included or have to be resubmitted? I don't think so. I think it would it would be treated similar like if you had to resubmit a RATA test. Right. We're still only expecting one compliance report per quarter per unit. So we're not expecting you to then submit a second compliance report that might potentially be different from the first one that won't work. Are we going to, and maybe we haven't decided yet, are we going to try to cross check to look for compliance averages on days when units operate or are we just not going try to do that initially, not initially? I can't see how or why we would do that. OK. I don't know if that helps or not, Jeff. Again, our primary goal is to bring the data in. Um, I am very. For lack, I'm very not concerned, but. I'm very respectful of the of the problem of trying to QA some of these things in the compliance report because of the various compliance options and what gets counted, what doesn't get counted and unit averaging. I see that as a serious problem with false positives if we try to do checks on it. So. I'm taking the very minimal approach to any checking that we would do because I don't want to generate false positives. We're not a compliance, you know, program in that sense. This is a state in a regional local delegated authority type program. And if somebody shows up and is doing an audit on a facility, it is their job to go through and tie all this together. We're looking at this strictly from a data integrity standpoint. At Chris, if there's a critical error with the compliance report QA file. Um, critical errors never hold up submission of information. Right. Well. So here's the here's the scenario if I had a compliance report that had a critical error. And I had other QA test data in there that I needed for part 75. We've been through this where people will create one QA test file. It dumps out everything in that QA test file from the quarter, for example. So all the QA tests, right? If it was me and I had problem with my quarterly compliance report and that was holding me up, I would peel that piece off generated QA file that contains only the stuff that I know I need to submit. You know, the RATA, linearities, etcetera. Submit that separately and then circle back and deal specifically with just my QA, my quarterly compliance file. Right. That's part of the beauty of tying it into the QA, because it is granular and you can section pieces of it out. If it was tied into the admissions file, it would tie up, it would hold up the entire admissions file potentially, right. By doing it in the QA, I can submit all or none of my QA and peel off that quarterly compliance report and set it aside and handle my other stuff first. Good. Thanks. Um, so, um, I think this is all I had left on the piece specific to the quarterly compliance report. Um. We'll publish this. This brings us to the end of the QA piece. I think there's one more piece down here that I need to talk

about. Specific to 30/90 days. I don't have an answer on this one. Is this a 30 for each line of data? If we go with what people were saying earlier, where they want to put in that average or they want to create a compliance reporter or a? For each day whether or not they are operating. Um. I guess, I guess you can submit a record for every single day regardless whether or not you're operating if we change that. I don't know. That's kind of a question. That's not necessarily how I envisioned it, but I defer to you all as how you want to try and do this. OK, um. Chris, can you talk about the deviations and monitoring downtime section a little bit? Yeah, I found certain things in there a little. Confusing, and I'm trying to envision what that would really look like in practice. OK. Let me just touch, I'll jump down and I'll come back up. Alright, so we did have questions. Should this be broken out by analyzer CEMS emissions result? My assumption is that you would have and you'll see more. Somebody put this in here as two distinct data elements saying instead of doing deviations. You know you have two separate records, one that's deviation, the one that's monitoring downtime. Umm. Again, it's largely mirrored off of what was done in the rule. I could go either way if whether if we split it, you're going to have a lot of data duplication, right? Like unit average deviation code. That's all going be, you know. Well, I don't see these as two separate things, I see them as one thing. But you all would be better to try and explain how you would want to report this. Again, in theory, you guys have been submitting these reports as PDF's already, so you know what you want to include in here, right? Actually, they're, I guess my confusion you know is that that concept that. You know, are we we're trying to capture all downtime, right? Or we need to report all downtime? And then some subset of that downtime is also deviation. Right. To the extent that it, it wasn't because of preventative maintenance or routine maintenance. Mm-hmm. You know so. Like under the deviation type code we've got. Monitoring downtime incurred and then monitoring requirement not met. You know, and I guess like fundamentally, what is the difference between those two? That's an OAQPS question. That part as far as what's the difference between requirement not met and downtime incurred. Um. If it were me and I were reporting, I would and I'm going oversimplify this, but I would go through and I would say, you know. Here's my hours where I had a deviation and I'm using air quotes. And then here's my hours where I had a, you know, monitoring requirement not met. I would split it out as much as I needed to feel comfortable right? And do that so that as long as I felt like I had to actually act, it's going to be hard for somebody on the on the compliance side to read that and understand. But I would do it as granularly as they wanted it to be. Right. Does that make sense what I'm saying, Jason? Because again, you've got a wide variety of state compliance folks looking at this data, right? Yeah, but I mean, let's, let's see, you've got, you know, 30 hours of downtime comprised of 10 different blocks if you will, right? OK, you know, so how would that be? Reported from a mechanical perspective, you know in in this module, we'd have 10 different reports. Specific to each of those blocks encompassing the 30 hours for 10 different entries, if you will based upon begin date and end date. And then the secondary question is are we reporting those? Potentially twice to the extent that, you know, we report all of it with respect to downtime, right. And then some subset of that is also deviation in that it wasn't excused downtime, right, that it was a result of a malfunction or other issue with the equipment. Right. I don't know the answer to that Jason as far as I think we really need to figure that out because but my question comes back to you, what have you been submitting to this point? How are you splitting it out when you submit it now? Is it PDF? I mean essentially. It's a listing of all downtime, and then an additional indication of whether that downtime is also classified or considered. Deviation OK, because of the reason or reason the data was missing, right? So I think if I understand if from what I'm hearing from you is you don't think this data structure which is largely based on the rule, not largely is based on the rule, you don't think it is. The most flexible structure that would be needed to actually communicate this data that you're currently submitting as a PDF. Yeah, I struggled to kind of understand, you know, what that would look like mechanically, yeah. Chris, this this this data it appears to be I'm nearly identical, not 100% the same as what is in the detail report from under 60.7. You've got the summary data. For your exceedances and your downtime and the downtime is you know, QA monitoring, you fail calibration or etcetera and the list that that's at the beginning of these instructions of this section and to me it seems like. There are there are some distinct differences between that and. Overall, these the what's written in in your in the February release basically implies that if you have you may have 3 exceedances in a in a reporting period and you report that as one, but versus reporting each one individually or downtime events if you if you were having problems with an analyzer and you fail a calibration as an example and. Other technicians past get it get it back into control, but then two or three days later it drifts out of control again is and it creates another period of downtime. Each one of those would be reported as a separate granular event usingyour terminology, and so to me it seems like mimicking closer to. An event list. It would provide more clarity for this. Reporting section. So, so

you're saying like essentially the summary report, right. You know cause ordinarily we're not necessarily listing out or breaking out each individual event. You're binning it right into the broad EPA categories and listing a number of hours and percentage of downtime within the reporting period. That's what that's this is doing implies I was under the assumption this is a cumulative style where you add up all the things that fit in one category, you create one record with the hours that fit in that bin. You add up all the stuff that fits under another bin and then you report those. I you know, I. That's how I thought it was to be done but you know my understanding and speaking you know you know I represented DAS vendor and but speaking for all of the DAS vendors, I believe that every single DAS can create a listed report that shows. The reason you know calibration failure, the start time, the end time when it was brought into control and then a reasonable answer, which would be plugged into the comments here for what was done. To bring it back into control. OK. And all of the DAHS vendors I believe can create these episode lists and my understanding is and what we when we have guided our customers for reporting in their PDF file is to is provided that episode list. Or event list OK. And that they can also do the summary data. But if you know if you have the 1% or the one point, the 5% of downtime or 1 1/2% of excess. You have to submit all the detailed data under part 60 requirements. This is Dave Seuss. Could I add some context? I guess from our perspective, uh, we've had a lot of conversations with different clients throughout the years on this one. And I did join the call a little late. So maybe this was talked about earlier. But I do think math is structured the way it is, right? It's it, it defines these concepts. As good as any other regulation, um, I think what would help clarity here is to minimize changing of terminology from the regulation. So we've noticed that it's been very helpful to just use the terms in mats. You know, monitoring system malfunctions repairs deviation and downtime out of control periods, repairs, deviation and downtime. And then there's four other categories that just have downtime at the end of that and that's really the differentiation there between this. And I think we're really mostly concerned with this concept of deviation, right. And then there are kind of other summary or clarifications in the rule to define those deviation concepts. But I think this is when I look at this, I just see. More confusion instead of clarity with the mimicking of the regulatory language and then from the binning concept I'll just throw out there, I agree with what John was talking about. I think in general the DAS vendors evaluate this data really on the hourly level because we need the hourly data to propagate up to whatever compliance averages we're doing. Um, what we generally have been recommending is to evaluate these things on the hourly level to differentiate, especially when there's a concern of a potential deviation to really, you know, drill those down to understand is this due to, you know, a failed Cal or some other? Reason right, that would fall into that deviation category and then label the DAS codes whatever they need to be for those hours. And then for the summary reports, we've just been using the literally the language in the in maps in our in our recent summary reports. So I guess that would be my suggestion here would be to try to leverage those seven. Um. Terms just from the you know, the 60.7 concept from part 60 is now we're in the in the mats level here. To just use that terminology within the description code within the reporting instructions, I think would really help the community here. OK. So I understand like terms that doesn't bother me a bit. We I don't necessarily want to turn this into a part 60 discussion, but I we can modify terms what I'm what I'm trying to get at as much as anything is you know. We're held to the data elements that are in the rule, right? I can't ask you to report something that is not in the rule. So we can't wildly blow up that structure and say, OK, well, I want you to report, you know, a Daily Record of XY and Z. It's not in the rule, can't justify it, can't ask people to do it, can't build it because somebody will say they don't want to do it, right. So we're held to the structure of the data elements that exist in the rule. That's the limiting factor. I'm trying to understand ultimately how we can. Bring the data in without making it a an absolute mess or a reporting nightmare in that sense. But still, you know. But stick to what? We're limited in the data elements you know. So. Umm. That's my struggle at this point. With that, with this piece of the compliance reports based on the feedback. Umm. I'm open to suggestions. In the sense that what we've proposed, I'd like to see some examples that you guys have created, at least what you're submitting a PDF, maybe we can figure out a way to fit it within the existing data elements. We can the things that we can do, we cannot necessarily add new elements. We can't wildly blow this up at this point, it is what it is. Um, we can change the nesting and repeating of elements, right? We can change the nesting in the structure so that we could, you know, have. Something on it, on a on a different way, but we're playing within the confines of the rule. Did that make sense? So. And not a ridiculously tight time frame. So I think at this point with regards to the compliance reports, I would encourage you, I will publish this. I'll go through and look at what we have, what we put out there. It would be helpful for me if you would send me some examples of what you think is a quality compliance report that you're using in the PDF. And I can see if there's a way to at least flush out some of the

structure and make changes to it so that it works. It's not going to make everybody happy, but I don't know what else to do within the confines of the rule, right. I'll also check with the OAQPS to see if they have any comments on it, whether they want it to be a they expected it to be like a cumulative reporting, like what I was talking about, or if they're expecting it to be a daily thing. I can get that from them. But it it's it has to be done quickly. I don't know a good time, Chris, but there are a couple of questions in the chat regarding just overall compliance reporting. Yeah. I think you caught you mentioned this already, but there's a general question. Is there an XML schema for the parts 14 through 30 to get? Go to the ERT. I've asked for it, I haven't received it, so OK, so your answer is check with the ERT for an Excel file schema for those parts. OK. In which QA file will the compliance averages for facility averages be submitted? Umm, this is one of the things in MATS where you can comply with these 30 day averages, 90 day averages based on across facilities. The question is, I'm assuming all of the affected sources. I would definitely say. Yes, that is. That's the way I would report it. I would put the averages in for any units at any facilities that are participating in an average. Do you see what I'm highlighting on the screen? Yeah, this, this in my mind again, this is how you tie all of them together, right? You would submit the same record. Essentially with the different unit, but to wherever it applies to whatever groups. But you would tie them together using this unit averaging group ID. OK. So they're there. So then you would expect to see the same 30 day averages for anyone in that averaging group ID, yes. Yeah, OK yeah, good. Um. Let's see. If the compliance average was submitted for every day and not just opt days, would a QA file have to be submitted for a non operating quarter? So that's I don't know that we've decided what we're going to do about reporting for. Nonoperating days yet. So maybe that's premature to think about. Well, I think there's the non off days. And then do you submit a compliance report for non operating quarter? Yeah, I don't know the answer to that. Yeah. OK. Um, and then I don't, I I would, I don't know what the rule says as far as semiannual compliance reporting, but the question came up, have states bought into this reporting scheme? Is this really end of the paper semi annual submissions? And while these reports, including reports that are not really covered by this scheme, will no longer be required. I I don't know if this. I don't know if this replaces the semiannual compliance reports. I don't know. It's supposed to, but I think it again because we have a wide variety of states, I think you. You know, I mean states are obviously going to want access to these reports. They're not going want, I don't think they're going wanna hear industry say, well, we already submitted that to EMS, go look at it. So maybe that was the intent, but. Again, I don't, I don't know if if this compliance report actually does. Replace in its entirety that paper requirement. I guess that was the intent. Maybe. I don't know. That was the intent, but again, I. The new? But you've told me the new ECMPS 2.0 will be readable to anyone. You won't have to have a login access, right? I mean, so that's correct. So states should have the ability to go in and see these and download and view. These compliance reports, that's correct. OK. I think that's it. I hope we answered some of that. They won't have access to that XML file. That'll be viewable in CEDRI. Umm. So that's one distinction. But yeah, anything that's submitted in JSON file format should be viewable. Um, I have more. Uh, if we're, I don't have, I'm, we don't have anything at least on this part. We need to talk more about the compliance reports from compliance reports. Here's what I'm asking you all to do. If you have PDF's of compliance reports that you think are how you want to submit the data, please send those to me. I'll look at what we've proposed here from the structure. I'm going to talk to OAQPS right after this call. Try and track somebody down there and say, is this, how did you envision this so we can get these answers sorted? Any questions on that? Anything we should be doing differently with this? As far as trying to get it sorted. OK, um. We're going to leave this here. Um, again, I'll publish what I have up there. I'm going close this one. I'm going jump over to the last one, which is the emissions 1. So to jump into this, make it bigger. And so in here. Um, this is not yet updated, but let's go down to look at the data structure, because there's some stuff in here that you have not seen yet. Umm. In the data structure this and you'll see this as soon as published. This contains the new. Um, GMP, the daily backstop knocks emissions data elements that you'll want to look at this. I'm not necessarily prepared to go down all that path today, but. Since it's public knowledge, it's in here in this piece so you can see what that looks like. Um, I'm going go into jump to the sections that we did get comments on. Sorry for the jumping. Umm. It's very little that we got back on the on the actual emissions piece. Mainly people ask questions about why we proposed what we did as far as the difference between the ECMPS and the. Other part. Get down to one. Like I mentioned earlier, this piece, as far as what we've done from the admissions part, it's really just adding. You know data elements to exist. Not data elements, but new codes to existing data structures. The PM CEM shows up in the monitored hourly value section. So you'll see it here in the daily calibration. Here's our PM daily calibration stuff that we were talking about. I know there are some questions about

what we do with that with regard to span, scale span scales coming in as high. I need a valid verify if that needs to be done offline or online. I think it has to be online, but I'll try to get that sorted and get that included and this next publish. Um. This stuff here is specific to the daily calibration and the injection protocol. And it has to do with really, you know. The dynamic spiking indicator, all of this stuff. So you'll have to go through this if you haven't. I didn't get many comments on what people were looking at here. It should be pretty clear cause I left this as red line strikeout so you should be able to see it. Questions. This is the daily backstop piece that I was mentioning earlier. That's going in. If they have one here. Chris, this is Jason promise. I was just curious like. What's the rationale for requiring percent monitor availability? You know, for a PM, Suns or something of that nature. You'd have to ask OAQPS:. On that one. My assumption, and I'm again making this up, is that it's, it's due to, you know, demonstrate compliance, right. Like I can in some sense you want to make sure that percent monitor, they're actually monitoring the correct or percentage of the time, right. We're already identifying downtime though with respect to this, the compliance report, right. And frankly, they're assessed on different time frames, right? It's just yeah, it's. It's a bizarre concept. Yeah, I I didn't write the rules, so I can't speak to that. Alright. Um. So in here you should you'll get down to the PM part. Under the monitored hourly value, it literally just shows up in a few places. There's not a lot to it. Umm. Yeah. We didn't get a lot of comments on it. You know, there's not a whole lot of MODC codes available for it in the sense that, you know, I think we it's we mentioned them here, we talk specifically about what should be in here. I thought we did. But yeah, this is your PM stuff. Monitored hourly value, continuous. You know CPMS, PCEMS. Here's the PM stuff that I was looking for. You know. I assume that what we put in there people understood because again, we didn't get a lot of comments on it so far. Um, I encourage you, if you didn't get a chance to look at it, go through and look at these highlighted items here. See if that jives with what you think should be reported. You've got the parameter codes, you've got the PMC, the PMCO. We did get one comment. Someone was asking. They thought that the PPM concentration should always need to be reported in milligrams per standard cubic meter. In order to do the, you know, pounds for mmbTU calculations, but again. The rule specifically allows you to do. You know any number of things because they say or other unit of measure. So that's up to you all how you want to report that. That makes sense. Um, specifically, we did get a comment on, um, the significant figures. I don't have an answer on that one as far as what the significant figure should be. I'll follow up on this and try and get an answer included in this comment section here as far as responding back to that. Questions. So yeah, the emissions part is pretty quiet as far as what we received comments on which. Is, I don't know either a good thing or a bad thing. So that's all I have. For today. Um. Let's talk next steps. Here's my plan. I'm going try and get a hold of a OAQPS after this as soon as I can and track down. You know, get some of the answers to the questions that I have. I'll try and get these published as soon as I can as far as with responses to the comments in here. I won't necessarily have answers on what we're going to do with the. The quarterly compliance reports I'll try, and that's going take another couple of days to at least figure out what's going on there. I from you all, if you have PDF's of compliance reports that you've previously submitted, that would be helpful so we can understand how that might fit better or how we could modify the compliance report section to make that a little more usable, right? And we, we could certainly send you those individually, but anyone can pull those up through web fire. I mean in theory you or a colleague could pull down a lot of examples if you wanted to. I could do that, but I'd prefer you send me the examples of what you think is a good compliance report, right? Than me waiting through Webfire and just grabbing random facilities. So. Send me what you think should be included what? What makes a good compliance report, right? And then again, I'll have to look at, I'll have to talk to OAQPS and figure out if they're on board with what we're talking about and then it's all still within the confines of the data elements of the rule. But we can try and get that sorted as quickly as possible and republished for another call. Um. So those are my 2 action items in the sense that I've got to go through sort out the responses to the questions that I didn't get answers today. Talk to OAQPS about some of those, talk to them about the compliance reports. If you all can send me examples of compliance reports that you think we'll we're going to take another crack at this. And, um, as soon as I can get something published, we'll do another call on short notice because again, we're trying to finalize this by the end of the month. Comments. How are we communicating with this group? Chris, about exactly when the new version will be published and we will have a follow up call. So for anybody who wants to be in the loop, they need to apply or make sure they have subscribed to the constant contact e-mail thread which is on the ECMPS 2.0 reengineering site. Um, previously we had the other listserv that was on the candy support site. We did port all of those over to the constant contact. If you were subscribed to one or the other or both, you should have received. If you if you made it to this

meeting and you got an e-mail to make it to this meeting, you should be on that list. I just asked because good question. Yeah, someone was asking like when will the next version of the edited? Reporting instruction be published, so probably be notified through that. Yes, subscription or whatever. Yeah, OK. And if I can do it, we'll do this same call, at least they're an abbreviated version of it to talk specifically about compliance reports next week. Yeah, Travis added. A link on how to subscribe to e-mail list in the chat. Thanks Travis. Yeah, thank you. Any other questions? Will there be a meeting at EPRI? Ohh. We're going have lots of meetings at April. We're utilizing EPRI. As the meeting time frame, so, um, Tuesday. Will be dedicated in the morning primarily to EPA folks. What I've seen preliminarily is that after lunch, Chris will be going through. Um, maybe a 2 hour demo of ECM PS 2.0? Where we're at? What kind of applications do we have? Q&A sessions. So. It will be part of the EPRI conference this year, not prior to. Yeah, I didn't have any plans in that demo to go over this specific piece of the puzzle. Um. But we're going to set up a booth for Chris and uh, it'll have a big banner says ask me questions about ECMPS 2.0 and he's going sit there by himself. I would love to sit by myself if nobody came by, but I doubt that's going to happen. But honestly, all joking aside, What we're going try to do for the actual EPRI portion of the presentation is going through the beta itself and talking about that process. This is a separate track. My hope is that we can get something published and finalized on these instructions by the end of the month, which will then in turn serve as the high level requirements document for making changes to the beta going forward through the rest of the year to get. Analyze before we get to 2024. Um. But you know, if we get to where we have something and we have some lingering issues which we better not cause, it'll be may by then and that's really too late. We can always, you know, entertain questions. We're always open to questions, and we're always open to feedback and suggestions. This. This idea of PM CEMS calibrations online or offline Chris um the question was or the concern is if PM CEM calibration have to be conducted online then is there a start up calibration and grace. Uh, for these part 60 online daily calibrations. I'm going to um. Respectfully, e-mail thread on that. I'm not going pull it up on this call, but I have an e-mail thread on that from Robin. Yeah, and that's why I'm respectfully going disagree with Chris on this. I think PM daily calibrations can be ducted, can be conducted online or offline, but Chris is going confirm that, so stay tuned. I do, but I they wouldn't have a demonstration test similar to a part 75 online offline demonstration test. No that that's not what the question was. Yeah, I know. I'm just making that clear because that was the question in another part of the. Uh. Instructions. But we can confirm loud and clear for sure. Anything else? There's a comment. We need OAQPS to sit beside us, set up right? Maybe so. Maybe so. OK, this has been a wondering discussion, but I hope it's a little bit useful. Um, again, send me any comments, questions that you have. You'll see an e-mail once we get something else published on these and kind of give you an update of what's been done. This has been recorded, the transcripts been done. We'll publish all three versions, plus the recording for anybody who didn't see this. OK. You also published the comments that are. That are shown in the documents, that's exactly what I'm going to publish, John, is these documents that we're seeing right here, right. And they're going be done in Word file. So if people want to add additional comments to those and send them to me, that's probably the easiest way. I tried to go through today, obviously, and take everybody's comments and put them in this anonymous. I don't care if they're anonymous or not. If you don't care, I just want the right answer. I don't care who has questions. So if it's easier for you to take those word documents, put additional things in them and send it to me, that's helpful. OK. All right. Thank you note. I've had enough for today. I hope you all have a good day. Hopefully we'll get through this together. Alright. Thanks everybody for coming. Bye. Thanks.