

U.S. Environmental Protection Agency

Information Collection Request

TITLE: Air Emissions Reporting Requirements (AERR)

OMB CONTROL NUMBER: 2060-0580

EPA ICR NUMBER: 2170.13

ABSTRACT:

The Environmental Protection Agency (EPA) promulgated revisions to the Air Emissions Reporting Requirements (AERR) on February 19, 2015 (FR Vol 80, No. 33, 8787). Since then, the Agency has twice renewed its Office of Management and Budget (OMB) clearance -- under OMB control number 2060-0580 -- to enforce reporting and recordkeeping requirements associated with the AERR regulation. The most recent approval for this collection was approved via EPA's information collection request (ICR) # 2170.08 on January 31, 2022. In addition, OMB approved an emergency reinstatement on May 27, 2025, and it will expire on October 31, 2025.

EPA is submitting this supporting statement and ICR to take effect prior to the expiration date to support the AERR collection for November 2025 through October 2028. The EPA has provided the detailed calculations used to estimate collection costs in the attachment to this document, "AERR Revision Burden Estimates v11.xlsx," available in the docket for the rule (EPA-HQ-OAR-2004-0489). These calculations have considered public comments provided on the first notice.

Under the AERR ICR, 55 State and territorial air quality agencies, including the District of Columbia (DC), and an estimated 14¹ local and tribal air quality agencies, must annually submit emissions data of oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOC), particulate matter less than or equal to 10 micrometers in diameter (PM₁₀), particulate matter less than or equal to 2.5 micrometers in diameter (PM_{2.5}), and ammonia (NH₃). The current AERR rule, which can be found at 40 CFR Part 51 Subpart A, defines which emissions sources

¹ Fourteen local and tribal agencies reported for the 2020 NEI and eleven for the 2023 NEI. Fourteen is the maximum of the two years.

that State, local, and Tribal (SLT) agencies must submit individually as “point sources.” The point source definitions are different depending on the year, and SLTs report more point sources every third year for the “triennial inventory.” For triennial inventory years, States² must also submit point source emissions for Lead (Pb), emissions for stationary nonpoint and some nonroad mobile sources, and they must submit model input data for onroad mobile and nonroad mobile equipment. For mobile sources, California has different requirements because it uses different models, and California must submit emissions (rather than model inputs) for these data categories of the same pollutants listed above.

The annual emissions data collected through the AERR are used by the EPA Office of Air Quality Planning and Standards (OAQPS) to support development of the National Emissions Inventory (NEI). The NEI is more comprehensive for triennial inventory years because they include updates to all data categories. The EPA uses the NEI in developing national ambient air quality standards (NAAQS), performing regional and national modeling, providing air quality management support (e.g., State implementation plan (SIP) development) to State agencies and multi-jurisdictional organizations (MJOs), and preparing national trends assessments and other special analyses and reports. Currently, the same reporting mechanisms used for the criteria air pollutants and precursors (CAPs) listed above are also used for voluntary reporting of hazardous air pollutants (HAP) and other pollutants. These data are collected by the air agencies for their own purposes, and EPA encourages air agencies to voluntarily provide such data to EPA when it is available.

Supporting Statement A

1. NEED AND AUTHORITY FOR THE COLLECTION:

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The AERR serves to coordinate the various State emission inventory reporting requirements and has streamlined the activities involved in submitting emissions data to EPA. As such, the AERR

² Except where noted, future reference to “state(s)” in this supporting statement includes 50 States, 3 territories, 14 local and Tribal agencies, and the District of Columbia (DC). As prescribed by the Tribal Authority Rule (63 FR 7253, February 12, 1998), codified at 40 CFR part 49, subpart A, Tribes may elect to seek Treatment as State (TAS) status under the Clean Air Act and obtain approval to implement rules such as the AERR through a Tribal Implementation Plan.

(1) achieves uniformity and completeness in a national inventory to support national, regional, and local air quality planning and attainment of NAAQS and planning needed for meeting regional haze requirements and (2) provides an approach for voluntary HAP emissions and other pollutant data collections that is consistent with criteria pollutant and precursor emissions data collection.

NAAQS and Regional Haze Analysis Support. As with past AERR collections, CAP emissions collections support States' and EPA's efforts to address national, regional, and local air quality issues with cost-effective practices. For NAAQS implementation, an ongoing need exists for States to develop consistent inventories and to share their emissions inventory data across the air agencies. For example, for air quality modeling done for NAAQS implementation, a State needs emissions data from other States surrounding it. This collection includes several additional elements that will further improve NAAQS support, including specific requirements for special cases of emissions collection for airports, locomotives, and commercial marine vessels, and requirements for providing activity data and documentation for nonpoint (*i.e.*, county-wide total), onroad, and nonroad sources.

The Clean Air Act (CAA) provides EPA ample authority for acquiring such data. Emissions data are of vital importance to EPA for fulfilling a host of monitoring, standard-setting, rulemaking, reviewing, and reporting duties. For example, CAA section 110 requires each State to prepare a plan that provides for implementation, maintenance, and enforcement of the primary standard for each pollutant for which air quality criteria have been issued. This plan must include provisions for periodic reports identifying sources and listing amounts of pollutant emissions. Further, CAA section 301(a) authorizes the Administrator to promulgate regulations necessary to carry out the CAA.

More specifically, statutory support for collecting and reporting emissions data is demonstrated in three sections of the CAA. Section 110(a)(2)(F) requires that each State provide for periodic reports on the nature and amounts of emissions of criteria pollutants from stationary sources. Sections 182(a)(3)(A) and 187(a)(5) of the CAA specify periodic inventory requirements for ozone and CO nonattainment areas, respectively. Section 182(a)(3)(A) requires States with ozone nonattainment areas to submit a

current inventory of actual emissions of VOC, and NO_x every 3 years. Section 187(a)(5) requires a similar inventory of actual CO emissions for CO nonattainment areas. Periodic inventories include emission estimates for all point, nonpoint, onroad mobile, nonroad mobile sources, and fires (also called “events” in the NEI). Section 172(c)(3) of the CAA provides the Administrator with discretionary authority to require other emissions data as deemed necessary for SIP development in nonattainment areas to meet the NAAQS. Section 169A of the CAA also directs EPA to provide regulations necessary for the protection of visibility, and the regulations that EPA has promulgated include some requirements for States that rely on emissions inventories.

NAAQS State Implementation Plans. To assist with fulfilling the CAA-mandated need for comprehensive data on emissions to support NAAQS implementation, EPA has promulgated several regulations that set requirements for States. These regulations are the Ozone SIP Requirements Rules (40 CFR part 51, Subparts X, AA, and CC) and the PM_{2.5} SIP Requirements Rule (40 CFR part 51, Subpart Z). These rules refer to the AERR for some of the emissions reporting requirements.

2. PRACTICAL UTILITY/USERS OF THE DATA:

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Emissions data about stationary point and nonpoint sources, as well as onroad mobile and nonroad mobile sources and fire activity data are routinely used by OAQPS, EPA Regional offices, and States in carrying out a variety of activities needed for implementing provisions of the CAA. The data are compiled into the NEI, which in turn supports development of an emissions modeling platform. Both the NEI and the emissions modeling platform support routine functions of the EPA and/or States, including:

- Basic information to support the boundaries selected for designation of nonattainment areas;
- Fires emissions data to support determinations of exceptional events;
- Evaluation of control strategies included in SIPs;
- Evaluation of control strategies for States and larger areas, including applications of regional and national scale models;

- Preparation and publication of national summaries of emissions including trend analyses and international reporting obligations for criteria pollutants and precursors;
- As a database to assist in the identification of important source categories for possible future regulation;
- Development of national control strategies and preparation of Regulatory Impact Analyses through application of air quality modeling;
- Research and planning for new and unsolved air quality issues;
- As a building block to assist States with compliance with their requirements for preparing SIPs;
- Evaluation of locations for ambient monitoring when regulations require monitoring near sources with emissions above certain levels (e.g., for lead); and
- Preparation of the stationary source portion of a report to Congress on SO₂ emissions. This report is required by section 406 of the CAA and is due on a 5-year cycle that began on January 1, 1995. The report must contain an inventory of national annual SO₂ emissions from industrial sources (as defined in Title IV of the CAA).

Further, HAP emissions reporting from States is voluntary under the AERR, and the HAP emissions data are used extensively throughout EPA's regulatory and informational programs to protect public health and inform the public and air planning officials of potential risks from these pollutants. The CAA includes various requirements for EPA to implement for which HAP data are used, including residual risk analysis under CAA 112(f)(2), technology reviews under CAA 112(d)(6), and review of source category listings under CAA 112(c)(5), via voluntary HAP collection. With the criteria pollutants, precursors, and HAP emissions all included in the NEI, EPA has developed nationwide risk information for all pollutants with the AirToxScreen program³ and its predecessor, the National Air Toxics Assessment (NATA) program. EPA Regional offices and State/local air agencies have used the risk data from AirToxScreen to determine focus areas for their air programs.

³ <https://www.epa.gov/AirToxScreen>.

In addition to supporting the efforts listed above, EPA uses emissions data to respond to numerous requests for reports on emission sources. Typically, the data are provided freely through EPA's website. In some cases, specific requests for data not available on EPA's website are also made by email and rarely, under the Freedom of Information Act. Requests come from the general public, teachers, contractors and consultants; Congress; the press; domestic and international universities; and others involved in research of many types.

3. USE OF TECHNOLOGY:

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The EPA has established a central repository of emissions inventory data for all States called the Emissions Inventory System (EIS). Emissions inventory data reported electronically are stored in the EIS, and the database is used by EPA and by States for obtaining emissions data reports and input files for air quality modeling. The EIS is further linked to EPA tools to share the data with the public on EPA's website.

The EPA maintains the EIS as a central repository of inventory data for all States, and much of the data must be supplied by the State and local agencies in electronic form. The EPA requires that submitting agencies use a defined eXtensible Markup Language (XML) schema for electronic data reporting using EPA's Central Data Exchange (CDX). Instructions for reporting data to the EIS via CDX are provided on EPA's website via the link "How Do I Submit to EIS Using the Web Client?"⁴ To assist States in preparing their submission for EIS, EPA has developed and provides a Bridge Tool, which allows for compiling data in Microsoft® Access® to convert to the XML format. In addition, the EIS provides on-screen data editing via a web browser in a module called the EIS Gateway. These tools have been in use for over a decade and have greatly streamlined the emissions collection and distribution processes for States.

⁴ <https://www.epa.gov/air-emissions-inventories/emissions-inventory-system-eis-users-manual-and-how-tos>.

The EPA has also established and maintains the Combined Air Emissions Reporting System (CAERS) to support collection of emissions data by States from owners/operators and sharing of that data with the Toxics Release Inventory (TRI).

CAERS supports burden reduction in several ways. CAERS allows owners/operators to enter data in a single location, and then CAERS distributes any data elements that are also needed by other emissions collection systems so that owners/operators can, at their option, avoid entering the same information in multiple places. For States and owners/operators, CAERS allows entering emissions data using online forms, Microsoft Excel,[®] and JSON formats. CAERS converts that data to the XML format needed for the EIS, so that States using CAERS to collect data from owners/operators have a seamless transfer of data to EIS. Additionally, CAERS can reduce burden for a State that chooses to use CAERS to collect point source emissions data and report it to EPA rather than develop and maintain their own emissions reporting data system.

Additionally, to support burden reduction for nonpoint sources, EPA develops emissions calculation tools and provides nonpoint activity and emissions data that States can review, comment on, and/or accept to meet their nonpoint reporting requirements. The EPA has allowed States to meet their AERR reporting obligations by (a) reviewing and providing comments on EPA's nonpoint emissions estimates for EPA to incorporate, (b) revising the estimates by reporting activity data and optionally reporting emissions and associated documentation, or (c) accepting the estimates after review. For onroad mobile sources and nonroad equipment, EPA develops and runs the latest mobile source emissions model using State-supplied model inputs and provides the resulting emissions for onroad and nonroad vehicles for review and comment by the States. For aircraft emissions, EPA compiles landing and takeoff data, provides to States for review and comment, and then computes emissions using the latest Federal Aviation Administration emissions model. For commercial marine vessels, EPA compiles activity data using the Automatic Identification System (AIS) database and computes emissions for review and comment by States. Finally, for locomotive emissions, EPA works with industry

representatives (on a voluntary basis) to compile rail yard activity data and draft emissions for review and comment by States.

For the voluntary reporting of wildfires and prescribed burning activity data, EPA compiles available satellite and ground-based fire observation data from numerous sources around the country, and provides those data for voluntary State review, edit, and comment (see Appendix A, Table A-6). Based on State comments, the EPA revises the wildfire and prescribed burning emissions based for inclusion in the NEI. In addition to the data mentioned above, EPA loads into EIS for use in the NEI several national datasets, including TRI, the Greenhouse Gas Reporting Program (GHGRP) data, and data on emissions from drilling wells from the Bureau of Ocean Energy Management.

The following references provide pictures and instructions of the various data entry tools for this collection:

- The CDX web client instructions and user interface pictures are available on the “EIS User’s Manual and ‘How to’ website”.⁵ The links for “How Do I Submit to EIS Using the Web Client?” and “How do I Log on To the Network Exchange Services Center?” provide the necessary information.
- The EIS Gateway instructions and user interface pictures are available in the EIS Users’ Guide.⁶ This includes a section with instructions and pictures for the EIS Bridge Tool. However, this guide is available only to the State, local, and Tribal agency users who have the responsibility of reporting and therefore have been granted access to EIS by the EPA. So, the relevant parts of the online EIS Users’ Guide have been converted into PDF files and included as the docket entry named “AERR collection forms,” via attachments named starting with “EIS Manual.”
- The CAERS instructions and user interface pictures are available in the CAERS Version 6 Users’ Guide.⁷

⁵ <https://www.epa.gov/air-emissions-inventories/emissions-inventory-system-eis-users-manual-and-how-tos>.

⁶ <https://eis.epa.gov/userguide/index.html>.

⁷ <https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers>.

- For the voluntary reporting of fires data, the EPA provides States an Excel® template, which is available as a “Fire Activity Data Submittal Form Template” attachment to the docket entry named “AERR collection forms.”

4. EFFORTS TO IDENTIFY DUPLICATION:

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Previous reporting requirements have sometimes caused State agencies to have inefficient collecting and reporting activities. The AERR was promulgated specifically to simplify previously existing emission inventory reporting by States to EPA, offer options for data collection and exchange, and unify reporting dates for various categories of inventories to avoid duplication of effort. For example, under the NO_x SIP Call rulemaking (40 CFR part 51, subpart G), EPA required States to submit annual inventories for all NO_x sources for which States had adopted control measures to meet their NO_x budget. In addition, statewide NO_x inventories of all controlled and uncontrolled sources were required every 3 years. The Consolidated Emissions Reporting Rule (CERR), which was the precursor to the AERR, also required annual and triennial emission inventory reporting of many of the same data elements. The publication of the original AERR aligned the reporting dates and combined data from these two previous collection activities to avoid duplication of information collected from sources, minimize the burden on industry, and reduce the effort for State and local government agencies to compile the data. Additionally, other regulations including the Ozone SIP Requirements Rules (40 CFR part 51, Subparts X, AA, and CC) and the PM_{2.5} SIP Requirements Rule (40 CFR part 51, Subpart Z) refer to the AERR for some of the emissions reporting requirements specified in those rules.

More recently, EPA has worked in partnership with States as part of the E-Enterprise for the Environment⁸ program to develop the CAERS as described above. States can voluntarily participate in CAERS using a variety of approaches that wholly or partly offset the need for States to develop and

⁸ E-Enterprise for the Environment is a collaborative partnership through which EPA, States, and Tribes work together to improve the way we protect the environment and human health. See also <https://www.epa.gov/e-enterprise>.

maintain their own electronic point source emissions data collection system. CAERS also allows States to avoid purchasing such a system or from using less efficient paper forms. Any electronic data collection system has a user “front-end” for data entry and a “back-end” database to store and manage the data, and CAERS provides States a way to replace the front-end and/or back-end of the States’ electronic collection systems. As a result, when States participate in CAERS, they can wholly or partly offset the cost of maintaining their own electronic data system.

Additionally, EPA recognizes potential duplication across certain Federal emission data collection programs. States collect data from facilities, including HAP emissions. The EPA collects data from States for the NEI (including voluntarily submitted HAP emissions), and EPA also collects HAP emissions data from owners/operators as part of the collections required for TRI (40 CFR part 372). For this reason, CAERS makes any HAP data reported by owner/operators to States using CAERS available to the TRI-MEweb software. TRI-MEweb allows owner/operators to import the data they submitted to CAERS (for the NEI) to avoid having to re-enter it into TRI-MEweb, which reduces burden. With this approach, owners/operators can use CAERS to report any state-required HAP emissions (that also flows to the NEI), then CAERS maps and aggregates that data to the resolution needed for the TRI. This approach promotes burden reduction for owner/operators and data consistency across agencies. While this feature is not appropriate to be used in all cases because of different facility definitions, there are many cases in which the State definition of facility and the TRI definition align and, therefore, promote burden reduction for owner/operators.

5. MINIMIZING BURDEN ON SMALL ENTITIES:

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

No small entities are regulated by the AERR because the rule applies to State agencies or their delegates. State agencies are not considered to be small entities. According to EPA’s ICR Handbook, OMB’s definition for a small entity includes small governmental jurisdictions with populations of less than 50,000. According to 2010 population data from the U.S. Census Bureau, no State or territory has a

population below this threshold. In addition, none of the local air agencies that report under the AERR for their jurisdictions represent an area with population of less than 50,000.

6. EFFECTS OF LESS FREQUENT COLLECTION:

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The EPA uses the AERR collection to create the NEI, which is a foundational source of data used for various key aspects of the NAAQS program including ambient monitoring locations, air quality modeling for NAAQS and regional haze, analyses to support transport SIPs, and other critical needs to implement requirements of the Act. If EPA collected the data less frequently, the lack of timely information would mean that decisions would be made on more outdated information, potentially adversely affecting policy choices. The EPA and States can better analyze solutions to air quality problems when they have as current information as possible. For example, without knowledge about controls that have already been applied to a facility, the EPA or State might seek to impose controls on a source for which controls have already been applied. With triennial collection, the NEI program can be perceived as having outdated information. The CAA specifies a 3-year emissions data collection for ozone via the periodic emissions inventory reporting requirement under section 182(a)(3), so if the AERR were to have a less frequent collection, it would be misaligned with that 3-year requirement. Finally, if EPA did not collect these data at all, it would be extremely difficult, if not impossible, for the Agency to carry out many of its statutory obligations under the CAA related to the NAAQS and visibility.

Additionally, the collection of annual emissions data for HAP through voluntary reporting helps the EPA to meet the requirements of multiple provisions in the CAA, for example, including the provisions in CAA section 112(f)(2) for residual risk analysis and to promulgate numerous regulatory actions; in CAA section 112(d)(6) for completing technology reviews every 8 years; and in CAA section 112(c)(5) to review the list of section 112 source categories and list new source categories and subcategories according to statutory criteria. While these activities may require additional data collection efforts to develop complete information needed for the EPA to meet requirements of the Act,

the voluntary HAP collection program allows EPA to have ready access to the information collected by States.

7. GENERAL GUIDELINES:

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

This ICR does not violate any of OMB's guidelines for information collections.

8. PUBLIC COMMENT AND CONSULTATIONS:

8a. Public Comment

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.

The EPA published a notice (90 FR 23932) on June 5, 2025 to solicit comments about specific aspects of the proposed information collection and provided 60 days for public comments. The comment period closed on August 5, 2025. The Agency received 165 unique comments, of which 1 was a mass comment appeal representing 49 individual submissions of the same comment. Both the mass appeal as well as 115 additional comments were not in the scope of the ICR because they were comments about the GHGRP or other EPA regulations not associated with the AERR ICR notice. The EPA has provided responses to other comments in the response to comments (RTC) document for the first ICR notice.⁹

In addition, 26 commenters appealed to EPA not to weaken emissions reporting requirements more generally. EPA views these comments as supportive of the first ICR notice, which did not include any weakening or other changes to the AERR reporting requirements.

Of the remaining 24 unique comments, 14 were supportive comments. Some comments addressed the underlying AERR rule rather than the ICR. For example, one commenter requested that EPA maintain consistent requirements nationwide, which EPA agrees with because the AERR already

⁹ The RTC document for this ICR is available as an attachment to this document in the AERR docket, called "ICR RTC, 2025 Notice 1."

does so. One commenter raised a concern about AERR implementation regarding how the Agency treats voluntary submission options.

Six commenters provided specific comments about the calculations used in the ICR. One commenter misunderstood the hours included for quality assurance, which EPA clarified. This commenter also suggested regional wage rates be used in the ICR, and EPA responded by using weighted averages that factor in State differences but still results in one wage rate per labor category to avoid the unnecessary complexity that would result to attempt regional wage rates in all aspects of the ICR. Another commenter asked for more explanation about CAERS cases, which the EPA has provided here, and raised concerns about the burden reductions that the EPA assumed come from a State changing their emissions collection approach to use the CAERS system. The EPA explained that the burden reductions are higher than what the commenter might expect for their own purposes because the Agency assumes that those agencies who have inefficient approaches currently would be more likely to migrate to the CAERS approach. Another commenter had suggestions about the hourly wage rates used, which the EPA addressed and incorporated updates to the calculations to reflect these suggestions. One commenter asked the Agency to better explain the use of a 2.1 multiplier (a 110% increase) from the Bureau of Labor Statistics (BLS) wage rates, and the EPA has provided additional available information in section 12d.2 of this notice. Finally, one commenter suggested that the EPA is underestimating the number of facilities that the AERR requires to be reported as point source. The EPA disagrees and has further explained the basis of EPA's approach in section 12d.1 and in the response to comments document.

8b. Consultations

Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The EPA meets with multi-State organizations semi-monthly to answer questions and listen to comments and concerns about many issues, including the AERR.

In April 2021, the EPA held two listening sessions with States asking for feedback on the collection. Participants were also encouraged to send further comments to the Agency after the listening sessions.

On July 24, 2023, the EPA proposed modifications to the AERR. The Agency held webinars for various stakeholder groups including States and industry representatives.¹⁰ The proposal elicited input from persons outside of the Agency on the availability of data, frequency of collection, the clarify of instructions and recordkeeping, disclosure, or report format, and on the data elements to be reported. This input is available in the AERR regulatory docket.

Further, on June 23, 2025, the EPA held a webinar with SLTs reviewing the cost estimation approach used for this ICR to facilitate their review and comment on the first ICR notice.¹¹

9. PAYMENTS OR GIFTS TO RESPONDENTS:

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

This information collection does not provide payment or gifts to respondents.

10. PROVISIONS FOR PROTECTION OF INFORMATION:

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Collection of data through EIS and CAERS includes Personal Identifiable Information (PII) for users to register with the CDX. This information is name, role (certifier, preparer, SLT reviewer), work address, work email, and work phone number. The EIS has a system of records notice (SORN) and

¹⁰ The webinar materials and recordings are available at <https://www.epa.gov/air-emissions-inventories/air-emissions-reporting-requirements-aerr> section "Webinar Slides & Select Recordings" dated August 2023 through October 2023.

¹¹ A memo entitled "Webinar on AERR ICR burden calculation workbook" is provided in the regulatory docket (EPA-HQ-OAR-2004-0489), which provides a summary of the meeting and lists the attendees. A recording of the webinar is available at <https://www.epa.gov/air-emissions-inventories/air-emissions-reporting-requirements-aerr> (see section on "Webinar Slides & Select Recordings").

privacy impact assessment (PIA). CAERS is built within the CDX and shares its SORN with CDX. CAERS additionally has a PIA and shares the email addresses collected from owners/operators with SLTs using CAERS to collect data from those owners/operators.

Regarding confidential data, the data collected electronically via the AERR meets the definition of emission data as defined at 40 CFR 2.301(a)(2)(i) and are, therefore, not subject to confidential treatment.

11. JUSTIFICATION FOR SENSITIVE QUESTIONS:

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not ask any questions concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

12. RESPONDENT BURDEN HOURS AND LABOR COSTS:

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.*
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*
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12a. RESPONDENTS/NAICS CODES

The AERR requires States to report emissions data. The affected NAICS code is 924110 – Administration of Air and Water Resources and Solid Waste Management Programs, which includes governmental environmental protection and control agencies, and pollution control agencies. To meet requirements of the current AERR, States require owners/operators to submit data to the State, which

the State then submits to EPA. This indirect burden on owners/operators is included in the subsections below to describe burden for owners/operators.

12b. INFORMATION REQUESTED

The data elements specified in the AERR include both mandatory and optional data. The information collected differs for point sources (reported every year) versus for nonpoint, mobile, and fires (reported in triennial years). Appendix A of this supporting statement provides the labels and descriptions of the data fields collected for both mandatory and optional data fields for point, nonpoint, mobile, and fires sources.

In addition, the EPA provides States the option to provide input data to nonpoint emissions calculation tools rather than calculate and report emissions. These templates are provided electronically through the EIS user interface. The list of data elements that States may optionally provide is available in a separate attachment provided with this supporting statement via the regulatory docket in the entry “Nonpoint template data fields,” which is a PDF with the data fields and their descriptions.

12c. RESPONDENT ACTIVITIES AND FREQUENCY

The activities covered by this ICR can be grouped into 3 categories: one-time activities, annual activities and triennial activities.

One-time activities are associated with voluntary burden for States when they choose to adopt the CAERS to collect emissions data from their industry sources prior to releasing from the Agency to the EPA. These activities are to update and deliver training to owners/operators about new reporting approaches, curating the list of facilities to remove duplicate facilities, and various miscellaneous activities needed to ensure CAERS meets State requirements. For some States, they may choose to adopt CAERS in a way that requires them to modify their own State reporting system to use the CAERS user interface while retaining the State database back-end.

Annual activities are associated with complying with the AERR’s annual collection activities for point sources. This includes quality assurance of submitted data and support for owners/operators

making revisions to their submissions, extracting the emissions data from the State emissions inventory system, converting the data into the XML format required by the EIS for both the facility attributes data and the annual emissions information, running EIS quality checks and resolving any critical errors, and submitting the final XML data file(s) to EPA via CDX.

Regarding triennial activities, States must perform the same steps as for annual activities (usually for additional sources) as well as report emissions for other data categories (nonpoint and mobile). These include reporting nonpoint emissions, reporting tool inputs, or reviewing/commenting and/or accepting EPA data for those sources included in EPA tools. Activities also include reporting nonpoint emissions for source types not included in EPA tools, adjusting the nonpoint submissions to exclude those portions of counties overlapping with Indian country, reporting aircraft and ground support equipment activity data or reviewing/commenting/or accepting EPA airport activity data, reporting rail yard emissions or reviewing/commenting/or accepting EPA emissions estimates of rail yards. For all States but California, this work includes reporting EPA's MOtor Vehicle Emission Simulator (MOVES) model inputs. For California, this work includes reporting onroad and nonroad emissions.

Voluntary triennial activities include reporting point source data for additional (voluntarily reported) facilities, documentation for nonpoint emissions reported not using EPA methods, reporting documentation for aircraft, ground support equipment, and/or rail yards if not using EPA data, commenting on EPA prescribed fire and wildfire activity data, and/or submitting activity data, and/or submit emissions, and formatting and submit season-day emissions (includes point also).

12d. RESPONDENT BURDEN HOURS AND LABOR COSTS

This section includes information on the number of respondents, the annual hour burden, and explanations about how the burden was estimated. The data and calculations used for estimating burden hours and labor costs are available in the "AERR Revision Burden Estimates v11.xlsx" workbook provided in the docket for the rule, which is referred to throughout this document as the **"ICR workbook."**

12d.1 Number of respondents

For the 2026-2028 period covered by this ICR, the EPA expects reporting by 54 States (including the District of Columbia, Puerto Rico, Virgin Islands, and Guam), 9 local air agencies, and voluntary reports by 5 Tribal air agencies. These numbers are based on the maximum of the SLTs that submitted for either the 2020 or 2023 NEI. These values are reflected in cells B4 through B6 of the “SLT NEI burden details” worksheet of the ICR workbook.

The State and local agencies pass along reporting requirements based on AERR to the owners/operators of facilities for which the agencies must report emissions. This ICR includes the burden associated with this *required* reporting from owners/operators to States and locals but excludes the burden of owners/operators reporting data to States/locals that the agencies report to EPA voluntarily (such as extra facilities and HAP emissions values).

To determine the number of facilities required to report to States for the NEI, EPA has used the existing reporting information from States to EPA and the estimated number of Major Title V sources from the previous AERR ICR. The design of the AERR point source reporting requirements is that the facilities that are required to report are these Title V Major sources plus any additional non-major sources that meet the 0.5 tpy actual emissions threshold for Pb emissions.

The AERR reporting thresholds are potential-to-emit (PTE) thresholds and largely consistent with the definition of major sources; however, EPA does not collect PTE data under the AERR. The EPA only collects actual emissions, and actual emissions are typically lower than PTE values. Since EPA does not collect data on PTE, it is difficult to know with certainty the number of annually required sources. Furthermore, many States voluntarily submit many more facilities than those required. For these reasons, EPA must estimate the number of required sources for triennial and annual reporting.

The total number of major sources required to report to States/locals has been adjusted from that used in the previous ICR: 13,420, which includes all major sources available from the EPA Enforcement and Compliance History Online (ECHO) web application, plus an additional 12 sources that

have 0.5 tpy of lead (Pb) or more and are not otherwise identified as Major Title V sources. Since this number was developed several years ago, we believe this number is conservative because the total number of major sources tends to decrease over time, as facilities close and units are decommissioned or are replaced by newer and cleaner technologies. Since the ECHO database does not indicate whether the facility is a major source due to its CAP, HAP (or both), EPA has further refined this count to split out the CAP major (including CAP/HAP major) facilities from those that are only HAP major sources, which allows for better quantification of burden for the mandatory requirements versus burden for reporting that States do voluntarily. Any facility that is not a CAP major source but is reported by the State is considered a voluntarily reported source.

To calculate the number of CAP major facilities, EPA performed additional analysis using the 2017 NEI,¹² Integrated Compliance Information System for Air (ICIS-AIR),¹³ and a compilation of Residual Risk and Technology Review (RTR) data. Both designations of major sources as well as actual emissions in these databases were used. This approach further identified each NEI facility as being a CAP major, CAP/HAP major, or HAP major source. More information on this analysis is available in Section 2.1 of the Technical Support Document (TSD) available in the AERR docket.¹⁴ This approach identified 10,831 major sources, with 9,991 of these either CAP major or CAP/HAP major. To estimate the total number of CAP major for purposes of this ICR, EPA multiplied the 13,420 total major sources by the ratio of the 9,991 CAP major to the total 10,831 major. This approach resulted in an estimated 12,379 CAP major sources, which is the number of facilities used to calculate the burden due to State requirements on owners/operators to report CAPs so that the States can comply with the AERR.

Reporting that occurs during calendar years 2026 and 2028 is for the “smaller” set of sources due to higher thresholds for the 2025 and 2027 inventory years as listed in Table 1 to Appendix A of the

¹² 2017 National Emissions Inventory (NEI) Data, U.S. EPA, <https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data>.

¹³ Integrated Compliance Information System for Air (ICIS-AIR), U.S., EPA, <https://www.epa.gov/enviro/icis-air-search>.

¹⁴ U.S. EPA, Technical Support Document: Revisions to the Air Emissions Reporting Requirements (Proposal), June 2023, Docket number EPA-HQ-OAR-2004-0489-0091.

AERR.¹⁵ Reporting in calendar year 2027 includes more point sources because 2026 is a triennial reporting year. The EPA has chosen to use the same number of interim year facilities as was used in the previous ICR, which is 2,510 facilities. Based on an analysis of the 2017 NEI, 1,055 facilities had *actual* emissions greater than the 2024 and 2025 inventory year PTE thresholds of 2,500 tpy of NO_x, CO, or SO₂, or 250 tpy of VOC, PM₁₀, PM_{2.5}, or NH₃. To adjust for the undercounting due to actual emissions, we retained the number of estimated facilities from the previous AERR ICR, which is about 2.3x the facility count based on actual emissions. As a result, we assume 2,510 of the sources are required for the non-triennial years. Therefore, across the 3 years covered by this ICR, the average number of facilities per year is: $(2 \times 2,510 + 12,379) / 3 = 5,800$.

A unique aspect of the AERR is voluntary participation by rail companies to provide data to EPA regarding the activity at rail yards so that the EPA can make emissions estimates to help State and local agencies. The State and local agencies can then review the information collected by EPA rather than having to collect it themselves for the NEI. The EPA has worked with rail companies in past years and is aware of 7 rail companies that could participate. Thus, the number of rail companies used for the purposes of voluntary cost estimates for this ICR is 7.

12d.2 Labor Costs

For this ICR, labor rates were developed using the U.S. Department of Labor, Bureau of Labor Statistics (BLS) web site as of May 2024 as accessed in May 2025. Hence, the labor costs assessed in this report are in 2024 dollars.

For costs of owners/operators reporting to States, the EPA used the labor rates as summarized in Table 1a below, consistent with past AERR ICR renewals to use the rates for Environmental Engineers and their managers. In this table, the EPA has used the mean hourly wage rates that are appropriate for private industry. In addition, consistent with prior EPA ICRs, EPA applied an overhead rate of 110% (a factor of 2.1) to all rates to derive the fully loaded rates. While the BLS labor rates include the basic employee benefits packages, the additional 110% accounts for business costs of employing a worker

¹⁵ This smaller set of sources is referenced as "Type A" sources in the AERR.

beyond their wages and benefits, such as Social Security and Medicare contributions, unemployment insurance, and all the other business expenses associated with hiring, training, and equipping their employees.

TABLE 1A: LABOR RATES FOR OWNERS/OPERATORS REPORTING TO STATES

Employee Type	Employer	Mean Hourly Wage	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tabels.htm)
Environmental Engineer	Any	\$53.16	\$111.64	https://www.bls.gov/oes/special-requests/oesm24nat.zip
Architectural and Engineering Managers	Any	\$84.48	\$177.41	https://www.bls.gov/oes/special-requests/oesm24nat.zip

Based on comments received on the first notice for this ICR (as described in the RTC) document for this ICR, the EPA has revised the approach for State labor costs as compared with past ICRs in three ways in addition to using the more current rates: (a) incorporating a new labor category for “Environmental Scientists and Specialists, Including Health,” (b) weighting the labor rates to reflect different level of effort in each State resulting from different numbers of facilities and counties for each State, and (c) removing the distinction between private labor rates and State government rates because the State-specific labor rates used for weighting were not available by State and employer type.

This ICR includes State labor rates for estimating burden associated with reporting point source emissions and separate labor rates for estimating burden associated with nonpoint, mobile, and fires emissions sources. To create the labor rates for point sources, the EPA started with BLS State-specific labor rates as cited in the rightmost column of Table 1b below for the relevant employee types. The EPA weighted these rates based on the number of required “expected facilities” (as per EIS quality checks) to be reported by each State. The worksheet “Labor information” within the ICR workbook provides the weighting factors and calculations used, resulting in the final values in Table 1b below. As with the private sector wage rates, EPA adjusted the wages using the same 110% adjustment described above.

TABLE 1B WEIGHTED LABOR RATES FOR STATES REPORTING POINT SOURCES

Employee Type	Employer	Mean Hourly Wage	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tables.htm) + Calculations described below
Environmental Engineer	Any	\$51.70	\$108.57	https://www.bls.gov/oes/special-requests/oesm24st.zip
Environmental Scientists and Specialists, Including Health	Any	\$40.29	\$84.60	https://www.bls.gov/oes/special-requests/oesm24st.zip
Architectural and Engineering Managers	Any	\$80.05	\$168.10	https://www.bls.gov/oes/special-requests/oesm24st.zip
Network and Computer Systems Administrator	Any	\$46.04	\$96.68	https://www.bls.gov/oes/special-requests/oesm24st.zip

Table 1c below provides the labor rates for nonpoint, mobile, and fire sources. To create these estimates, the EPA started with the same BLS State-specific labor rates as used for point sources and then weighted these rates based on the number of counties to be reported by each State. As with the previous wage rates, EPA adjusted the wages using the same 110% adjustment described above. The worksheet “Labor information” within the ICR workbook provides the weighting factors and calculations used, resulting in the final values in Table 1c.

TABLE 1C: WEIGHTED LABOR RATES FOR STATES REPORTING NONPOINT, MOBILE, AND FIRE SOURCES

Employee Type	Employer	Mean Hourly Wage	Loaded Hourly Rate	Source (via https://www.bls.gov/oes/tables.htm) + Calculations described below
Environmental Engineer	Any	\$50.37	\$105.77	https://www.bls.gov/oes/special-requests/oesm24st.zip
Environmental Scientists and Specialists, Including Health	Any	\$39.52	\$82.99	https://www.bls.gov/oes/special-requests/oesm24st.zip
Architectural and Engineering Managers	Any	\$78.08	\$163.98	https://www.bls.gov/oes/special-requests/oesm24st.zip
Network and Computer Systems Administrator	Any	\$45.14	\$94.80	https://www.bls.gov/oes/special-requests/oesm24st.zip

12d.3 Burden and costs for State respondents

The State burden for complying with the AERR includes burden to meet both the annual and the 3-year (triennial) cycle reporting. Within the annual and triennial reporting requirements associated with the AERR, the EPA has estimated the burden separately for one-time activities, annual reporting, and triennial reporting. Burden for point source reporting in triennial years (2026 for the 3-year period of this ICR) is higher because more sources are required to be reported in triennial years as described previously.

The States reporting to EPA under the AERR maintain their own air quality management programs, which include permitting programs and annual emissions fee programs for their point sources. These fees help offset costs associated with running these emissions programs. Nevertheless, this ICR includes as part of the burden estimates, the States' efforts to collect and manage emissions inventory data for these purposes, much of which occur irrespective of the AERR. However, this ICR does not include certain efforts of States unrelated to requirements of the AERR or the associated burden on their owners/operators. Costs to owners/operators are not included in this ICR when they are associated with States collecting and reporting data to EPA that the State requires but the AERR does not require, such as HAP emissions or facilities smaller than the point source definition.

For AERR reporting, States can optionally choose to use CAERS to collect data from owners/operators prior to submitting for EPA to use in the NEI, via the EIS. A State's choice of whether and how to use CAERS can impact the costs of compliance with AERR. The EPA and States have envisioned four cases for how a State could interact with CAERS. Under CAERS cases 1 and 2, the State would choose to retain its data system but rely on some aspects of the CAERS system for data sharing with other emissions programs. States may also choose CAERS case 3, in which the State uses the CAERS user interface and retains its back-end database or CAERS case 4, where the State uses CAERS for both the collection and the storage of the point source emissions inventory data. For AERR burden assessment, CAERS cases 1 and 2 have the same costs as directly reporting to the EIS, whereas CAERS

cases 3 and 4 have lower burden than if an State has a separate data system. The assumptions included about lower costs are described further below with the cost tables.

Currently, 6 States, and 2 local agencies use CAERS to collect data from owners/operators and report it to EPA, and the EPA is working with one State to start using CAERS in calendar year 2026 for a total of 9 States/locals for reporting occurring during 2026 (for the 2025 data). Two of the States use case 3 and the other 7 use case 4. The EPA expects that over the period covered by the ICR, no additional States will adopt case 3, three additional States per year will adopt case 4 for calendar year 2027 and two more for calendar year 2028. These numbers give a total of 12 agencies in 2027 and 14 agencies in 2028. These assumptions are included in the "SLT NEI burden details" worksheet of the ICR workbook in cells Q29 through U33.

The tables below provide estimated hours burden for voluntary one-time activities per State respondent who adopts CAERS during the 3-year period of this ICR. Table 2 provides estimated burden in hours for States to do one-time activities to adopt CAERS cases 3 and 4. Note that the costs for case 3 implementation are included here even though the EPA does not expect any States to adopt CAERS during the 3-year period covered by the ICR. Table 3 provides a sum of the annualized burden per State and costs for these activities, based on the labor rates previously described for the "Architectural and Engineering Managers," "Environmental Scientists and Specialists, Including Health," and "Network and Computer Systems Administrators."

TABLE 2: STATE RESPONDENT BURDEN FOR ADDITIONAL VOLUNTARY BURDEN FOR ONE-TIME POINT SOURCE ACTIVITIES WHEN USING CAERS.

Activity	Hours Per Respondent			
	Engineering Managerial Hours	Scientist Technical Hours	IT Admin Hours	Total
CAERS Case 3 and Case 4				
1. Update and deliver training to owners/operators about new reporting approach	24	240		264
2. Curate list of facilities to remove duplicates	16	160		176
3. Other coordination activities including ensuring any CAERS customizations meet SLT requirements.	48	480		528
CAERS Case 3				
4. Modify SLT system to receive data from CAERS user interface.	104		1,040	1,144
Subtotal - Case 3	192	880	1,040	2,112
Subtotal - Case 4	88	880		968

TABLE 3: ANNUALIZED ONE-TIME BURDEN PER STATE RESPONDENT.

Activity	Manager Hrs/Yr @ \$168.10	Scientist Hrs/Yr @ \$84.60	IT Hrs/Yr @ \$96.68	Hours/ Yr	Labor Cost/ Year
Point Sources Optional Activities					
Transition Tasks for CAERS case 3	64	293	347	704	\$69,089
Transition Tasks for CAERS case 4	29	293	0	323	\$29,747

The AERR requires States to submit emissions data every year for annually reported point sources based on the AERR potential-to-emit thresholds for NO_x, CO, SO₂, VOC, PM₁₀, PM_{2.5} and NH₃, and the actual emissions reporting threshold for Pb (in triennial years only). As listed in Table 4, the key steps to perform the work to meet the AERR requirements are:

- Collect emissions data and other associated information;
- Quality-assure and quality-control emissions data and resolve errors and anomalies prior to submitting to the EIS electronic quality-assurance;
- Maintain records associated with data submitted by sources;
- Extract the necessary data from the State electronic data system;
- Convert any facility inventory data (*i.e.*, attributes of the facility including details about its units, processes, release points and controls) for new facilities into the XML submittal format;
- Convert the point emissions data into the XML submittal format;
- Run the automated quality-assurance checks provided in the EPA data system and resolve any critical errors;
- Submit the final file to EPA; and
- Respond to any follow-up inquiries and point source data reviews from EPA.

In addition, States may optionally include in their submissions additional data, including emissions for facilities that are not required to be reported annually as well as HAP and GHG emissions.

TABLE 4: STATE POINT SOURCE REPORTING BURDEN HOURS BY ACTIVITY

Activity	Hours Per Respondent			
	Engineering Managerial Hours	Scientist Technical Hours	Total	Applies to CAERS Cases?
Point sources - Annual (required and voluntary)				
1. Quality assurance of submitted data and revision support	2	24	26	3 @ 100%, 4 @ 50%
2. Extract data from the State data system		4	4	3
3. Convert data into the XML format – facility attributes information		8	8	3
4. Convert data into the XML format – annual emissions information		4	4	3
5. Run EIS quality-assurance checks and resolve critical errors	2	24	26	
6. Submit final file to the EPA via CDX		2	2	3, 4
7. Respond to follow-up inquiries from the EPA	2	4	6	3, 4

Activity	Hours Per Respondent			
	Engineering Managerial Hours	Scientist Technical Hours	Total	Applies to CAERS Cases?
Subtotal Annual Point Source Reporting via EIS	6	70	76	Hours Reduction
Subtotal Annual Point Source Reporting via CAERS Case 3	4	46	50	34%
Subtotal Annual Point Source Reporting via CAERS, Case 4	3	16	19	75%
Point sources - Triennial CAPs (required and voluntary), additional hours				
1. Quality assurance of submitted data and revision support	12	120	132	3 @ 100%, 4 @ 50%
2. Extract data from the State data system	0	4	4	3
3. Convert data into the XML format – facility attributes information	0	16	16	3
4. Convert data into the XML format – annual emissions information	0	8	8	3
5. Run EIS quality-assurance checks and resolve critical errors	12	120	132	
6. Submit final file to the EPA	1	2	3	3, 4
7. Respond to follow-up inquiries from the EPA	10	20	30	3, 4
Subtotal Triennial Point Source Reporting Increment via EIS – all point sources via EIS	35	290	325	Hours Reduction
Subtotal Triennial Point Sources Reporting Increment via CAERS Case 3	23	170	193	41%
Subtotal Triennial Point Source Reporting Increment via CAERS Case 4	16	80	96	70%

To account for States that we estimate will use the CAERS for the required annually reported sources in the 2026 through 2087 calendar years, we have considered the reduction in effort associated with the steps for reporting to EIS necessary only when a State maintains their own data system and thus needs to convert that data for submission to the EIS. As shown in Table 4, the rightmost column

shows which steps are necessary for agencies that use CAERS. In making these estimates, the Agency assumes that those agencies who have inefficient approaches currently would be more likely to migrate to the CAERS approach, which makes the burden reduction higher than it might for other States that have more sophisticated data collection approaches already in place.

In triennial reporting years, in addition to point source collection and reporting, the AERR includes additional triennial activities for States as listed in Table 5a (locals and Tribes are covered separately in Table 5c). In addition, Table 5b provides the calculations for estimating the hours needed for activities 1 and 2. For activity 1, we assume States use EPA nonpoint tools by providing inputs for some sectors and accept emissions for other sectors for any nonpoint category for which there is an EPA tool. This is the preferred option, and the cost assumes a mix of these two approaches as shown in the top part of Table 5b. The number of States included for each activity is based on EPA's experience with past NEI cycles. The average hours provided calculated as previously described for States.

TABLE 5A: STATE (NOT LOCAL OR TRIBAL) NONPOINT, MOBILE, AND OTHER SOURCES BURDEN HOURS BY ACTIVITY

Activity	State count	Hours Per Respondent		
		Engineering Managerial Hours	Scientist Technical Hours	Total
Required activities				
1. Report nonpoint emissions, report tool inputs, or review, comment and/or accept EPA data (for sources included in EPA tools)	54	84	1,679	1,763
2. Report nonpoint emissions for sources not included in EPA tools	18	12	240	252
3. Adjust nonpoint submissions for boundaries of Indian country	4	3	54	57
4.Report aircraft and ground support emissions or review, comment, and/or accept EPA airport activity data	54	2	40	42
5. Report rail yard emissions or review, comment, and/or accept EPA emissions estimates or EPA activity data	43	1	16	17

Activity	State count	Hours Per Respondent		
		Engineering Managerial Hours	Scientist Technical Hours	Total
6. Report commercial marine vessel (CMV) and locomotive emissions data or review, comment, and/or accept EPA emissions estimates.	42	4	80	84
7. For all States but California, report MOVES inputs	53	6	120	126
8. For California, report onroad and nonroad emissions	1	9	180	189
Average hours per State, required activities	54	96	1,915	2,011
Voluntary Activities				
9. Report documentation for nonpoint	13	14	280	294
10. Report documentation for aircraft, ground support equipment, and/or rail yards	5	2	40	42
11. Comment on prescribed fire and wildfire activity data, submit activity data, or submit emissions	20	8	160	168
12. Format and submit season-day emissions (includes point also)	9	1	10	11
Average hours per State, voluntary activities	20	18	357	375

TABLE 5B: ASSUMPTIONS AND CALCULATIONS FOR STATE NONPOINT TOOL SUBMISSIONS (ACTIVITIES 1 AND 2)

Review/Prepare/Submit inputs or emissions for sectors with EPA tools (Activity 1)	No. States	Basis	Average Submitted Templates or Sectors Per State	Average Hours/ Template or sector	Total for All States Performing Sub-task	Average Hours Across All States
Prepare/Submit Wagon Wheel Input templates	36	Per template	12	20	8,640	1,168
Review/accept Wagon Wheel Input templates	54	Per template	84	12	54,432	
Prepare/report O&G inputs	16	Per sector	1	40	640	17
Review/Accept O&G inputs	22	Per sector	1	12	264	
Review/comment/accept other tool inputs (except CMV)	54	Per sector	4	12	2,592	48

Review/Prepare/Submit inputs or emissions for sectors with EPA tools (Activity 1)	No. States	Basis	Average Submitted Templates or Sectors Per State	Average Hours/ Template or sector	Total for All States Performing Sub-task	Average Hours Across All States
Prepare/submit emissions for sectors with EPA tools (except O&G)	13	Per sector	11	80	11,440	212
Prepare/submit emissions for O&G	10	Per sector	1	120	1,200	22
Complete Nonpoint Survey (approach to accept EPA inputs/estimates)	54	all	1	2	11,440	212
Subtotal						1,679
Prepare/Submit emissions for sectors without EPA tools (Activity 2)	No. States	Basis	Average Submitted Templates or Sectors Per State	Average Hours/ Template or sector	Total for All States Performing Sub-task	Average Hours Across All States
Prepare/Submit emissions for sectors without EPA tools	18	Per sector	2	120	4,320	80

In addition to the estimated hours for States, the local and Tribal agencies perform similar activities, but we assume that the number of hours for local and Tribal agencies is 1/3 those of States because of the smaller number of counties (often a single county) and sectors that would be included in local and Tribal areas. Table 5c provides the estimated burden hours for nonpoint, mobile, and other sources. The average hours provided in the table are weighted averages of the rows above, with weighting for a row based on the number of local/Tribal entities listed for that row's activity.

TABLE 5c: LOCAL AND TRIBAL NONPOINT, MOBILE, AND OTHER SOURCES BURDEN HOURS BY ACTIVITY

Activity	Entity count	Hours Per Respondent		
		Engineering Managerial Hours	Scientist Technical Hours	Total
Required activities				
1. Report nonpoint emissions, report tool inputs, or review, comment and/or accept EPA data (for sources included in EPA tools)	5	26	504	530

Activity	Entity count	Hours Per Respondent		
		Engineering Managerial Hours	Scientist Technical Hours	Total
2. Report nonpoint emissions for sources not included in EPA tools	2	4	72	76
3. Adjust nonpoint submissions for boundaries of Indian country	0	0	0	0
4. Report aircraft and ground support emissions or review, comment, and/or accept EPA airport activity data	9	3	55	58
5. Report rail yard emissions or review, comment, and/or accept EPA emissions estimates or EPA activity data	9	2	40	42
6. Report CMV and locomotive emissions data or review, comment, and/or accept EPA emissions estimates. ^a	0	0	0	0
7. Report MOVES inputs	9	2	40	42
8. For local agencies, coordinate with State agencies to complete stationary nonpoint, nonroad mobile, and onroad mobile sources for all pollutants	9	4	80	84
Average hours per entity, required activities	9	24	511	535
Voluntary activities				
9. Report documentation for nonpoint and mobile (locals and Tribes)	7	5	84	89
10. Report documentation for aircraft, ground support equipment, and/or rail yards	7	2	40	42
11. Tribes report emissions other than point	5	7	122	129
Average hours per entity, voluntary activities	7	12	211	223

^a This activity is covered in Table 5a because no local agencies submit CMV or locomotive data.

To estimate annual cost burden per respondent, we have pulled together all of the hours from the tables in this section into Table 6a below and used the labor rates for managers and environmental scientists for point source reporting from Table 1b and for nonpoint/mobile/fire reporting from Table 1c. The values in Table 6a cover States reporting to EIS from their data systems and exclude burden and cost reductions associated with using CAERS cases 3 or 4, and Table 6b provides the CAERS cost reductions.

TABLE 6A: ANNUALIZED BURDEN OF NEI SUBMISSIONS PER STATE RESPONDENT FOR EIS APPROACH

Information Collection Activity	State, local, or tribal count	Manager Hrs/yr @ \$147.80/Hr	Scientist Hrs/yr @ \$96.54/Hr	Total Hours/ Year	Cost/Year
Annual Required Activities					
Submit annually reported point sources CAPs with EIS (see Table 4)	56	4	49	53	\$4,851
Point Source Triennial Required Activities					
Submit additional triennial point sources CAPs with EIS (see Table 4)	56	8.17	67.67	76	\$7,097
Average Burden per Entity, Required Point Source Activities	56	246	1,289	2,695	\$11,949
Other Triennial Required Activities					
States: submit triennial nonpoint; mobile sources/ MOVES inputs (see Table 5a)	54	32	638.33	670	\$58,222
Local agencies: nonpoint, mobile sources/ MOVES inputs (see Table 5c)	9	8	170.33	178	\$15,448
Average Burden per Entity, Required Other Triennial Activities	63	29	571	600	\$52,142
Voluntary Activities (Triennial hours from other tables divided by 3 to annualize)					
State annual and triennial voluntary point source HAP reporting with EIS (see Table 4)	56	5	50	55	\$5,121
State voluntary triennial data reporting activities (see Table 5a)	20	6	119	125	\$10,860
Local and tribal voluntary triennial data activities (see Table 5c)	7	4	70	74	\$6,493
Average Burden per Entity, Voluntary Activities	56	8	101	109	\$9,811

Table 6b provides the estimated average burden reduction per responded once a State or local has adopted CAERS, and these burden reduction values are difficult to estimate. The EPA received a

comment on this issue via the first ICR notice.¹⁶ Importantly, the EPA has considered in making these burden reduction estimates that the States/locals expected to onboard would probably not have an ideal process currently such that they would receive a larger burden reduction than other States who have already optimized their emissions reporting activities in other ways. For example, some of the States who are currently using CAERS had previously used paper reporting with manual data entry, and so they would have more burden reduction in hours for collecting, quality assuring, and submitting emissions under the AERR than States or locals with a robust emissions inventory system like CAERS. Another source of burden reduction in using CAERS is lower costs associated with maintaining an electronic system, which is described in Section 13. of this ICR. The burden reduction values in this table are included in the total burden estimates in later tables by mapping the number of States/locals using CAERS cases 3 and 4 to these burden reductions.

TABLE 6B: ANNUALIZED BURDEN CHANGES PER RESPONDENT OF NEI SUBMISSION FOR CAERS CASES 3 AND 4

Information Collection Activity	Manager Hrs/yr @ \$168.10/Hr	Scientist Hrs/yr @ \$84.60/Hr	Total Hours Change/ Year	Cost Change/ Year
CAERS Case 3 Burden Changes				
Annual point source CAP reporting (see Table 4b)	-1	-12.2	-13.2	-\$1,200
Triennial point source CAP reporting (see Table 6b)	-2.0	-22.3	-24.4	-\$2,231
State annual and triennial voluntary point source HAP reporting with CAERS Case 3	-3.0	-29.5	-32.4	-\$2,992
Subtotal Case 3	-6	-64	-70	-\$6,423
CAERS Case 4 Burden Changes				
Annual point source CAP reporting (see Table 6b)	-1.8	-36.2	-38.0	-\$3,365
Triennial point source CAP reporting (see Table 6b)	-3.9	-46.3	-50.2	-\$4,575
State annual and triennial voluntary point source HAP reporting with CAERS Case 4	-3.6	-41.5	-45.1	-\$4,119
Subtotal Case 4	-9	-124	-133	-\$12,059

¹⁶ See page 15 of the RTC document, first referenced in Section 8a above.

Finally, Table 7 provides the annual total State burden and cost by activity, excluding any operations and maintenance costs. Consistent with the information provided above, the table shows 56 SLTs reporting point sources via the EIS, 2 reporting via CAERS case 3, and an average over 3 years of 10 reporting via CAERS case 4. The 63 agencies that report required nonpoint, on-road, and nonroad mobile data in triennial years are shown under the EIS heading (since CAERS is not used to report these sources). For the one-time voluntary costs to adopt CAERS, no States are expected to adopt case 3 during the ICR period, and five States/locals are expected to adopt case 4. Finally, the annual and triennial voluntary costs are included on the final line (e.g., reporting additional facilities and reporting HAP). At the far right, Table 7 shows an annual average hours burden for reporting (i.e., excluding operations and maintenance) for mandatory activities of 45,617 hours and \$4 million in costs and 7,865 voluntary hours associated with about \$712K in costs.

TABLE 7: ANNUAL TOTAL SLT BURDEN AND COST BY ACTIVITY (EXCLUDING OPERATIONS AND MAINTENANCE)

	EIS			CAERS Case 3			CAERS Case 4			Total	
Information Collection Activity	No. of SLTs	Total Hours / Year	Total Cost/ Year	No. of SLTs	Total Hours/ Year	Total Cost/ Year	No. of SLTs	Total Hours/ Year	Total Cost/ Year	Hours/ Year	Costs/ Year
Annual Required, Point Sources	56	2,979	\$271,682	2	80	\$7,302	10	152	\$14,863	3,211	\$293,848
Triennial Required, Point Sources	56	4,247	\$397,459	2	103	\$9,733	10	256	\$25,221	4,606	\$432,412
Triennial Required, Other Sources ^a	63	37,800	\$3,284,946							37,800	\$3,284,946
Labor Subtotal (Required)		45,026	\$3,954,088		183	\$17,035		408	\$40,084	45,617	\$4,011,207
One-Time Voluntary: CAERS	0	0	\$0	0	0	\$0	5	1,613	\$148,736	1,613	\$148,736
Annual and Triennial Voluntary	56	6,104	\$549,416	2	46	\$4,259	10	102	\$10,021	6,252	\$563,696
Total Voluntary		6,104	\$549,416		46	\$4,259		1,715	\$158,757	7,865	\$712,432

^a Costs associated with this activity are not broken out by CAERS cases. All costs are included with the group for EIS.

12d.4 Burden and costs for industry respondents

The burden for owners/operators to comply with the AERR includes those activities associated with mandatory requirements on the State and local agencies for emissions reporting. This burden is for owners/operators to report criteria pollutants and precursors and facility attributes to State and local agencies so that these agencies can comply with the final AERR requirements for annual and triennial reporting requirements. The burden does not include, nor do ICR requirements suggest that EPA should include the additional burden on owners/operators who report to the State when they are smaller than the AERR requirements for point sources.

While different burdens exist for owners/operators reporting to a given State collection approach versus the approach from another State, the EPA is unable to reflect those distinctions in this ICR because data are not available about burden from each of those systems. Similarly, we do not try to quantify the difference in facility burden for those States or local agencies who have adopted CAERS as their collection approach. For voluntary collections, owner/operator burden also includes voluntary activities by rail companies to provide rail yard data directly to the EPA.

Table 8 below provides the estimated number of facilities (from Section 12d.1) and number of hours for each facility to respond to the data collection by a State. Although some owners/operators who operate multiple facilities may report those data centrally and have efficiencies that reduce the burden, these estimates assume that all facilities report individually.

TABLE 8: ANNUAL BURDEN PER FACILITY FOR OWNERS/OPERATOR REPORTING

Activity	Facility Count for 1 Year	Ave. Facility Count Over 3 Years	Hours per Facility in 1 year			Total Cost/ Year
			Manager Hrs/yr @ \$177.41/Hr	Engineer Hrs/yr @ \$111.64/Hr	Total Hrs/yr	
Required activities						
1. Report annual CAPs by facility to States for use in triennial (2026) AERR report	12,379	5,800	1	24	25	\$2,857
2. Report annual CAPs by facility to States for use in 2025 and 2027 AERR reports	2,510		1	24	25	\$2,857
Required One-Time Activities						
Sub-total weighted average per year for required activities:	12,379	5,800	1.0	24.0	25.0	\$2,857
Voluntary activities for triennial inventory years						
3. Provide rail yard data to the EPA for 2026 (in 2027)	7	n/a	2	10	12	\$1,471

For items 1 and 2 in Table 8, these hours cover reporting CAPs to States for those facilities that the AERR requires be reported by States. Any time taken for HAP reporting for the 2026-2028 inventory years result from State requirements and are not driven by AERR requirements. The number of hours included in Table 8 are for reporting emissions data only and includes the time that staff at facilities may need to spend to answer follow-up questions from the States. The time taken by facilities to collect necessary data (e.g., throughput, source testing) to comply with the reporting requirements is assumed to be a part of State permitting, compliance, and other requirements, which go beyond the scope of this ICR. Since most facilities reporting during the period covered by this ICR have been reporting emissions data for many years, this ICR does not include the additional hours associated with collecting facility attributes.

Item 3 in Table 8 includes the hours for rail companies to provide, voluntarily, the EPA the activity data about rail yards. This work was previously described in Section 12d.1.

Table 9 below provides the annual total owner/operator burden of hours and costs for the activities listed in Table 8. The annual burden across the 3-year average of 5,800 facilities is about 145,000 hours per year with a cost of about \$16.6M per year.

TABLE 9: ANNUAL TOTAL OWNER/OPERATOR RESPONDENT BURDEN AND COST BY ACTIVITY

Information Collection Activity	Number of Facilities/year	Total Hours/Year	Total Cost/Year
Required activities			
1. Report annual CAPs by facility to States for use in triennial (2026) AERR report	5,800	144,993	\$16,567,945
2. Report annual CAPs by facility to States for use in 2025 and 2027 AERR reports			
Voluntary activities for triennial inventory years			
3. Provide rail yard data to the EPA for 2026 (in 2027)	7	84	\$10,298

13. RESPONDENT CAPITAL AND O&M COSTS:

Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Table 10 below summarizes the average hour burden estimates for operation and maintenance (O&M) of the SLT data systems for collecting point source data from owners/operators in the States. The table includes 50% of a full-time employee (FTE) for information technology (IT) administration and additional hours for a technical environmental scientist to provide guidance to IT administration and making minor annual updates to the data system such as new data codes and emission factors. The table additionally includes another 50% of a scientist FTE and associated management hours for user support. Engineering managerial hours have been estimated as 10% of the scientist and IT administrative hours associated with each activity. The table includes estimates of O&M adjusted for estimated reductions in labor associated with CAERS cases 3 and 4.

TABLE 10: SLT DATA SYSTEM OPERATION AND MAINTENANCE HOURS FOR NEI COLLECTION FROM OWNERS/OPERATORS

Activity	Hours Per Respondent				Applies to CAERS Cases?
	Engineering Managerial Hours	Scientist Technical Hours	IT Admin Hours	Total	
1. Collection system operation & maintenance (O&M)	112	80	1,040	1,232	Case 3 @ 80%
2. Update collection system with new codes, emission factors, and other new information for reporting year	12	40	80	132	Case 3 @ 80%
3. User support and training for point source emissions data reporting	110	1,052	40	1,202	Case 3 @ 50%, case 4 @ 50%
Subtotal for System O&M EIS	234	1,172	1,160	2,566	Hours Reduction
Subtotal for System O&M with CAERS Case 3	154	622	916	1,692	34%
Subtotal for System O&M with CAERS Case 4	55	526	20	601	77%

During the period of this ICR, the EPA assumes some State and local agencies would use CAERS to collect data from their owners/operators. This includes the including the 9 that currently use CAERS

(two for case 3 and seven case 4) and 5 additional State/local agencies joining during the 3-year period. These assumptions provide an average over the 3-year period of two agencies using CAERS case 3 and 10 agencies using CAERS case 4. The EPA further assumes that only those State and local agencies with less efficient systems currently would adopt CAERS, and thus the burden reduction associated with CAERS use is higher than for States with highly evolved custom emissions collection systems.

For States that choose CAERS case 3, the EPA estimates that the burden of activities 1 and 2 are reduced by about 20% because the State would no longer need to maintain the public-facing user interface for their collection system. Activities 1 and 2 are eliminated for CAERS case 4, since the State would no longer operator or maintain their own collection system. In both CAERS cases 3 and 4, the EPA also assumes that user support is reduced by 50% based on the streamlined processes put in place. The user support reduction would be averaged over the course of the 3-year period and would not be realized until the second and third years of CAERS implementation. Further, the EPA has attempted to include only those hours associated with the sources and pollutants that the EPA requires to be collected for reporting under the AERR. In other words, if States incur additional burden (e.g., more help desk requests) associated with collecting emissions data from facilities that the State chooses to collect (but are not required by the AERR), this ICR does not cover that burden. Based on this information, EPA estimates that the overall estimated O&M burden reduction for States, on average and based on previously stated assumptions, will be a 34% reduction for CAERS case 3 and an 77% reduction for case 4.

Table 11 below provides the annual average cost of State/local data system operations and maintenance (an average of about \$220K) per agency. This cost had not been included in previous ICRs for the AERR but has been occurring under the AERR; therefore, these costs are attributable only to revisions in the ICR approach. The number of agencies (10) listed for CAERS case 4 is an average over the three years (7, 10, and 12). For these operations and maintenance costs, EPA attempted to verify the costs of State data collection systems via feedback from States. One State said that their collection system costs ranged from \$10K/year to \$80K/ year, with an average of \$55K per year. In addition,

another State indicated that their current O&M costs were about \$200K per year. Based on this feedback, the annual average estimated costs shown in Table 11 of about \$220K may be a high estimate but would, therefore, be conservative for purposes of this ICR.

TABLE 11: AGENCY AVERAGE BURDEN OF DATA SYSTEM OPERATION AND MAINTENANCE COSTS FOR NEI COLLECTION FROM OWNERS/OPERATORS

Point source data collection system operations and maintenance for...	Ave. State, local, or tribal count	Manager Hrs/yr @ \$168.10/Hr	Scientist Hrs/yr @ \$84.60/Hr	IT Hrs/yr @ \$96.68/Hr	Total Hours/ Year	Cost/ Year
EIS reporting	56	234	1,172	1,160	2,566	\$250,632
CAERS Case 3	2	154	622	916	1,692	\$167,098
CAERS Case 4	10	55	526	20	601	\$55,679
Total and Weighted Average	68	205.3	1060.8	985.2	2251.3	\$219,506

This ICR also includes estimated annualized capital costs associated with workstations needed for States to submit data required or voluntarily submitted based on the AERR requirements. The EPA assumes that each agency will require 5 workstations to comply with the reporting provisions of the AERR (1 for point sources, 1 for nonpoint sources, 1 for onroad and nonroad mobile, 1 for wildfires and prescribed fires, and 1 for managerial/coordination activities). The number of workstations has been assumed to be unaffected when States participate in CAERS because although data system maintenance is reduced or eliminated, agency staff still need a workstation to access CAERS to perform their data oversight and submission functions.

The cost for replacing a workstation including new basic software and peripherals, when replacement becomes necessary, is assumed to be approximately \$1,500 per agency. For this ICR, it is assumed that 20 percent of the workstations will be replaced each year. Thus, the costs of replacement per agency is estimated to be:

$5 \text{ workstations/agency} \times 20\% \text{ replacement/year} \times \$1,500/\text{workstation} = \$1,500/\text{agency/year}$

Cost of workstation replacement for all agencies equals: $\$1,500/\text{replacement costs/year} \times 68 \text{ agencies/year} = \$102,000/\text{year}$.

Workstation maintenance costs are attributed to the normal maintenance of the workstations used to submit the required annual and triennial reports to EPA. This includes annual software costs, service costs, and warranty costs. It is assumed that the total cost of ownership over 5 years is four times the original purchase price, or \$6,000. Thus, the annual maintenance costs are \$6,000 minus the \$1,500 capital cost divided by 5, or $\$4,500/5$, which is \$900/year per workstation. We conservatively assume (that is, more likely to overstate than understate) that one-third of the workstation annual maintenance cost can be attributed to the AERR. The resulting estimated costs associated with AERR are estimated to be approximately \$300 per workstation per year, which is \$1,500 per agency per year. Total maintenance costs for the respondents are estimated to be:

$\$1,500/\text{agency/year} \times 68 \text{ agencies} = \$102,000/\text{year}$.

As a result, the total capital and maintenance costs per year are \$3000/agency/year.

Table 12 below provides the total estimated annual operations and maintenance hours and cost burdens separately for point data collection systems for EIS (affecting an average of 56 agencies per year), CAERS Case 3 (affecting 2 agencies), and CAERS Case 4 (affecting an average of 10 agencies per year). It also includes the annual capital and equipment maintenance costs for all 68 agencies included. Aggregated, the operations and maintenance burden sums to about 153,000 hours and \$15.1 million.

TABLE 12: ANNUAL O&M BURDEN FOR SLT DATA SYSTEMS

Information Collection Activity	Ave. No. of SLTs	Total Hours/Year	Total Cost/Year
Point Data Collection System O&M - EIS	56	143,696	\$14,035,411
Point Data Collection System O&M - CAERS Case 3	2	3,384	\$334,197
Point Data Collection System O&M - CAERS Case 4	10	6,010	\$556,792

Capital and Maintenance	68	0	\$204,000
Total		153,090	\$15,130,399

14. AGENCY COSTS:

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

The EPA activities associated with the AERR include:

- Maintaining a database of emissions factors (e.g., WebFIRE) for use by States and the point sources regulated by State agencies;
- Developing guidance and training materials for States for each emissions inventory reporting cycle and maintaining communication through EPA's website and other methods, including providing in-person, webinar-based, and self-guided online training;
- Evaluating the adequacy of existing emissions estimation methods and models, developing method and model revisions, and publishing updated methods and models as appropriate;
- Preparing nonpoint emissions data for review and possible use by State agencies;
- Preparing onroad and nonroad mobile model inputs for review and possible use by State agencies;
- Preparing data for review of participating agencies, including landing and takeoff data at airports and fire activity data and emissions;
- Receiving, reviewing, and storing emission inventory data submitted by each State agency;
- Processing and updating data submitted by State agencies, including performing quality assurance of data and coordinating efforts to resolve errors and anomalies;
- Fulfilling technical assistance and information requests;
- Developing technical documentation of the resulting emissions inventories created from compiling the collected data;
- Maintaining the EIS and associated electronic reporting approaches;
- Developing, operating, and maintaining the CAERS; and
- Maintaining reporting codes to use in emissions inventory databases to identify various aspects of emissions inventories such as emissions unit types, release point types, source category classifications, and geopolitical entities.

14b. Agency Burden and Labor Cost

The EPA's costs that relate to this collection can be grouped into 7 areas:

- 1) Maintaining a database of emissions factors for use by States and the point sources regulated by States;
- 2) EIS annual operation and maintenance costs;
- 3) CAERS annual development, operation, and maintenance costs;
- 4) Preparing and providing guidance, plans, and training to State agencies;
- 5) Revising emissions estimation methods and models to reflect the best available science, including mobile model updates related solely to support of AERR implementation;
- 6) Preparing draft nonpoint emissions and mobile-source model inputs;
- 7) Review, documentation, and publication of data; and
- 8) Information requests.

EPA labor needs for this collection are broken out as follows:

- 2 FTE: maintain emissions factors in support of the NEI program
- 3 FTE: maintain the data systems (2 FTE for EIS and 1 FTE for CAERS)
- 1 FTE: prepare and provide emissions reporting guidance, plans, and training to State agencies
- 2 FTE: Revise emissions estimation methods and models to reflect the best available science for support of nonpoint emissions methods.
- 1 FTE: point sources quality review and coordination with States
- 1.3 FTE: mobile sources overseeing contractors, quality assuring results, developing documentation, distributing and communicating about draft data.
- 3 FTE: nonpoint sources and fires overseeing contractors, quality assuring results, developing documentation, distributing and communicating about draft data.
- 1 FTE: respond to information requests from States, other government agencies, and the public
- 1 FTE: Across 10 regional offices, coordinate State/local efforts in making their submissions, quality reviews, outreach, and communication on behalf of the program.

Thus, the total number of EPA FTEs is 15.3. Since most of the FTEs for this estimate work in Research Triangle Park, North Carolina, we used the pay rates from the General Services Administration (GSA) with locality adjustment for the Raleigh-Durham-Chapel Hill area. We conservatively estimated that the average EPA worker for these purposes is a GS-13, step 7 with a salary rate of \$132,057 per year. In addition, a 26% increase in this amount was included to adjust for benefits paid by the government. The resulting annual FTE cost assumed is rounded to the nearest thousand dollars to \$166,000. Thus, the total resulting EPA annual impact for 15.3 FTE is 31,824 hours and \$2,539,800.

14c. Agency Non-Labor Costs

Starting in FY26, the EIS annual operation and maintenance costs are estimated to be \$1.3M for an information technology contractor and \$303,000 in Working Capital Funds. For CAERS, these costs are estimated to be \$325K for IT contracting support and an additional \$100,000 in Working Capital Funds. The EPA also incurs a \$800,000 annual cost to have environmental engineering contractors assist with developing emissions methods, building data tools, and keeping input data current.

14d. Agency Total Costs

Table 13 below summarizes the government costs along with the respondent costs from the previous sections. The annual capital costs for EPA sum together to \$403,000 in total for EIS and CAERS, and with the operation and maintenance and labor costs, the total EPA costs amount to about \$5.4 million.

TABLE 13: TOTAL ESTIMATED ANNUAL RESPONDENT AND EPA BURDEN AND COST SUMMARY FOR 2026 THROUGH 2028

Burden Element/Cost	SLTs	Owners/ Operators	EPA	Total
Number of Respondents Per Year	68	5,807		5,875
Total Hours Per year (including voluntary)	53,482	145,077	31,824	230,383
Annual Capital Cost	\$102,000	\$0	\$403,000	\$505,000
Annual O&M Cost	\$15,028,399	\$0	\$2,425,000	\$17,453,399

Total Annual Capital and O&M Costs	\$15,130,399	\$0	\$2,828,000	\$17,958,399
Labor Cost Per Year (including voluntary)	\$4,723,639	\$16,578,243	\$2,539,800	\$23,841,682
Total Cost Per Year	\$19,854,038	\$16,578,243	\$5,367,800	\$41,800,081

15. CHANGE IN BURDEN:

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

Table 14 below provides a comparison from the summary information of Table 13 with the previous ICR for the AERR. All costs reflect more current 2024 labor rates than the 2020 rates used in the previous ICR. Further, the SLT labor rates now include weighted average labor rates starting with State-specific BLS rates and they use different labor categories, in response to comments received in the first notice for this ICR. EPA labor rates have been updated based on the 2025 OMB pay scales as previously described.

As compared to the previous ICR for the AERR, this ICR covers more activities. First, this ICR has been modified to include the costs of emissions data systems that the States will likely run irrespective of this rule (to collect permit fees). Second, this ICR includes the burden on owners/operators for reporting data to the States so that States can report to EPA. These additions make the ICR more complete but are not adding real-world burden to States or owners/operators when compared to activities they are already doing. These additions are simply covering gaps in the previously approved AERR ICR. These types of costs would continue to occur regardless of this rule, by way of complying with other existing Federal and State laws and regulations.

For States, the number of respondents has been revised downward based on the most recent inventory years where fewer local and Tribal agencies are now reporting. The annual respondent burden has increased because of methodological differences from the previous ICR. For SLTs, the primary changes from the previous ICR are as follows:

- Improved assessment of point source annual burden from 50 hours/year in the previous ICR to 53 hours/year;
- Improved assessment of point source triennial burden from 97 hours/year in the previous ICR to 129 hours/year;
- Better understanding of CAERS point source reporting burden, with higher burden than the 8 hours assumed in the previous ICR;
- Improved assessment of other triennial burden activities from 609 hours for States and 333 for local agencies to 670 hours for States and 178 hours for local agencies. In addition to these new values, this ICR includes additional hours for voluntary activities that have been separately estimated, adding 55 hours for 56 States, 125 hours for 20 States, and 74 hours for 7 local and Tribal agencies.

Despite overall increases in hours per respondent, the decrease from 80 to 68 respondents and the expected change in agencies using CAERS from 8 in the previous ICR to 12 in this ICR results in very little change in the expected labor costs for SLTs. The previous ICR labor cost was about \$4.7M (total required and voluntary) whereas this ICR has about \$4M for required labor costs and \$700K for voluntary costs including additional CAERS adoption (see Table 7). Thus, the overall labor costs for SLTs remains about \$4.7M. The large increase shown in Table 14 below can, therefore, be attributed to the newly included costs of data system operation and maintenance of about \$15M (from Table 13).

Other EPA costs have changed since the previous ICR as well. These changes are fewer FTEs for maintaining data systems (from 5.7 to 3) and different contractor costs (\$1.3M for EIS rather than \$625K and \$325K for CAERS rather than \$1.2M). These changes result in a net expected \$221K reduction in Agency costs per year.

TABLE 14: BURDEN CHANGE

	Currently Approved ICR	Change	Total Requested
SLTs			

	Currently Approved ICR	Change	Total Requested
Annual Responses	85	39	124
Annual Respondent Hour Burden	48,702	+4,780	53,482
Annual Respondent Cost Burden	\$4,960,908	\$14,893,130	\$19,854,038
Owners/Operators			
Annual Responses	0	+5,807	5,807
Annual Respondent Hour Burden	0	+145,077	145,077
Annual Respondent Cost Burden	\$0	\$16,578,243	\$16,578,243
EPA			
All EPA Costs	\$5,589,000	-\$221,200	\$5,367,800

16. PUBLICATION OF DATA:

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This ICR quantifies the costs of collecting data for the NEI, from which the EPA publishes point source emissions data on an annual basis, with full inventory updates (including nonpoint, mobile, and events) every 3 years. After States submit the data, the EPA quality assures the point source data, resolves quality issues with the data submitters, and publishes the point source emissions in the EIS within 6-9 months. The remainder of the NEI data are published in the EIS and on EPA's website within 15 months. The NEI is used in numerous EPA activities that are described in the latest NEI Technical Support Document available on EPA's NEI website.¹⁷

17. DISPLAY OF OMB CONTROL NUMBER AND EXPIRATION DATE ON INSTRUMENTS:

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Data under this action will be collected through electronic systems. Given that the expiration date of an ICR can change based on monthly extensions near the end of an ICR approval, the EPA

¹⁷ <https://www.epa.gov/air-emissions-inventories/national-emissions-inventory-nei>.

requests that the expiration date not be required to be displayed on the EIS and CAERS data collection systems. The expiration date will be included in the user guides for both CAERS and use of CDX to submit to EIS.

18. CERTIFICATION STATEMENT:

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.

Appendix A: Information collected

The AERR collects numerous data elements as describes by the following three tables. Point source data are collected annually. Table A -15 provides the data elements for the point source facility characteristics (called the “facility inventory”) and Table A -16 provides the data elements for the annual emissions collection. For both point-source tables, data elements are repeated in multiple sections when they are used to connect the contents of different tables in the data submission. The tables are indicated with shaded rows in the table followed by an indentation before all the data elements listed in the tables. Table A -17 provides the data elements for nonpoint and mobile sources.

Table A -18 and A-5 provide the data elements for the voluntary reporting of fires data for broadcast burning and pile burns, respectively. Tables A-6 provides the format for the draft fire emissions data that the EPA provides for States to review and provide comment.

TABLE A-15: POINT SOURCE FACILITY INVENTORY DATA ELEMENTS AND THEIR DESCRIPTIONS

Table/Data Element		Required	Data Type	Definition
DocumentHeader				Identification information regarding the submission file.
	Author Name	Yes	Character (20)	Your name, not your user ID
	Organization Name	Yes	Character (20)	The name of the organization which you are representing
	Document Title	Yes	Character (3)	Must be "EIS"
	Keywords	No	Character (100)	Words that best describe the payload. Multiple keywords should be separated by commas. This is for transaction categorization and searching.
	Comment	No	Character (400)	Additional comments for processors
	Data Flow Name	Yes	Character (20)	Must be "CERS_v2"
	Property-Submission Type	Yes	Character (20)	Either "QA" or "Production"
	Property-Data Category	Yes	Character (20)	Must be "FacilityInventory" for Facility Inventory submittals.
	Property-NCD Data File	(Yes)	Character (20)	The name of the NCD zipped file which is being attached. Not applicable to Facility Inventory submittals.
	UserIdentifier	Yes	Character (20)	User ID currently valid and recognized by EIS.
	ProgramSystemCode	Yes	Character (20)	The Program System Code for the Agency to whom the user id is a member with write privileges in EIS.
	EmissionsYear	Yes	Integer (4)	The 4-digit year of the submitted emissions - required even for Facility Inventory submittals.
	Model	No	Character (80)	The name of the model or the conversion tool used for generating the emissions data.

Table/Data Element		Required	Data Type	Definition
	ModelVersion	No	Character (20)	The version of the model or conversion tool.
	EmissionsCreationDate	No	Date (YYYY-MM-DD)	Date that the data being submitted were created, or the date when the model generating the data was run.
	SubmittalComment	No	Character (400)	Any comments regarding the file submission.
FacilitySite		Yes		Information on the facility site, including the facility category code, company name, NAICS code, and operating status.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Facility Site Identifier
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective. Must be between 1900-01-01 and 2050-12-31.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable. Must be between 1900-01-01 and 2050-12-31.
	OrganizationFormalName	No	Character (100)	Name of the organization.
	AffiliationTypeCode	No	Character (20)	Identifies the function that an organization or individual serves, or the relationship between an individual or organization and the facility site. Must be a valid code.
	FacilityCategoryCode	No	Character (20)	Code that identifies the Clean Air Act Stationary Source designation. Must be a valid code.
	FacilitySiteName	Yes	Character (80)	The name assigned to the facility site by the reporter.
	FacilitySiteDescription	No	Character (100)	Supplemental text that describes the facility site.
	FacilitySiteStatusCode	Yes	Character (20)	Code that identifies the operating status of the facility site.
	FacilitySiteStatusCodeYear	(Yes)	Integer (4)	The year in which the operating status became applicable. Required if facility site status is other than "OP"- operating. Must be between 1900 - 2050
	FacilitySourceTypeCode	#	Character (20)	Code designating the facility's general category (Airport, landfill, etc.)
	HAPFacilityCategoryCode	#	Character (20)	Code designating the Hazardous Air Pollutant categorization of the site. Must be a valid code.
	CoordinateTolerance	#	Decimal (5,3)	Numeric value defining the difference release point coordinate value can deviate from the facility

Table/Data Element	Required	Data Type	Definition
			coordinate values.
FacilitySiteComment	No	Character (400)	Any comments regarding the facility site.
NAICSCode	Yes	Character (6)	The code that represents a subdivision of an industry that accommodates user needs in the United States.
NAICSType	No	Character (20)	Code defining the role of the NAICS code for the facility. Must be "PRIMARY" if reported in this table.
LocationAddressText	Yes	Character (100)	The physical location of a facility site or organization.
SupplementalLocationText	No	Character (50)	The text that provides additional information about a place, including a building name with its secondary unit and number, an industrial park name, an installation name, or descriptive text where no formal address is available.
LocalityName	Yes	Character (60)	The name of the city, town, village, or other locality.
LocationAddressStateCode	Yes	Character (5)	The alphabetic codes that represent the name of the principal administrative subdivision of the United States, Canada, or Mexico.
LocationAddressCountry Code	No	Character (20)	A code used to identify a primary geopolitical unit of the world. ONLY USED FOR CANADA AND MEXICO
LocationAddressPostalCode	Yes	Character (10)	The code that represents a U.S. ZIP code or International postal code.
AddressComment	No	Character (400)	Any comments regarding the address information.
LatitudeMeasure	Yes	Decimal (8,5)	The measure of the angular distance on a meridian north or south of the equator.
LongitudeMeasure	Yes	Decimal (8,5)	The measure of the angular distance on a meridian east or west of the prime meridian.
SourceMapScaleNumber	No	Integer (6)	The number that represents the proportional distance on the ground for one unit of measure on the map or photo.
HorizontalAccuracyMeasure	No	Integer (6)	The horizontal measure, in meters, of the relative accuracy of the latitude and longitude coordinates.
HorizontalAccuracyUnitof Measure	(Yes)	Character (20)	The horizontal accuracy unit of measure. Required if reporting Horizontal Accuracy Measure
HorizontalCollectionMethod Code	No	Character (3)	The code that identifies the method used to determine the latitude and longitude coordinates for a point on the earth.
HorizontalReferenceDatum Code	Yes	Character (3)	The code that represents the reference datum used in determining latitude and longitude coordinates.
GeographicReferencePoint Code	No	Character (3)	The code that represents the place for which geographic coordinates were established.
DataCollectionDate	No	Date (YYYY-MM-DD)	The calendar date when data were collected.
GeographicComment	No	Character (200)	The text that provides additional information about the geographic coordinates.
VerticalMeasure	No	Integer (6)	The measure of elevation (i.e., the altitude), above or below a reference datum.
VerticalUnitofMeasureCode	(Yes)	Character (20)	The vertical unit of measure. Required if reporting vertical measure
VerticalCollectionMethod Code	No	Character (3)	The code that identifies the method used to collect the vertical measure (i.e., the altitude) of a reference point.

Table/Data Element		Required	Data Type	Definition
	VerticalReferenceDatum Code	No	Character (3)	The code that represents the reference datum used to determine the vertical measure (i.e., the altitude).
	VerificationMethodCode	No	Character (3)	The code that represents the process used to verify the latitude and longitude coordinates.
	CoordinateDataSourceCode	No	Character (3)	The code that represents the party responsible for providing the latitude and longitude coordinates.
	GeometricTypeCode	No	Character (3)	The code that represents the geometric entity represented by one point or a sequence of latitude and longitude points.
	FacilityIdentifierIsReadOnly	#	Integer (1)	Indicator if the Facility Identifier is to be marked as "Read Only" for all users
	FacilityNameIsReadOnly	#	Integer (1)	Indicator if the Facility Name is to be marked as "Read Only" for all users
	LocationIsReadOnly	#	Integer (1)	Indicator if the Location is to be marked as "Read Only" for all users
	PrimaryNAICSIsReadOnly	#	Integer (1)	Indicator that the Primary NAICS code information cannot be changed.
	LocationAddressIsReadOnly	#	Integer (1)	Indicator preventing the value of the site location address from being modified.
	LocalityIsReadOnly	#	Integer (1)	Indicator that the locality information cannot be changed.
	PostalCodeIsReadOnly	#	Integer (1)	Indicator that the postal code information cannot be changed.
	GeographicCoordinates ReadOnly	#	Integer (1)	The text that provides additional information about the geographic coordinates.
FacilityNaics		No		Identifies the secondary and tertiary code(s) that represents a subdivision of an industry that accommodates user needs in the United States.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	NAICSCode	Yes	Character (6)	The code that represents a subdivision of an industry that accommodates user needs in the United States.

Table/Data Element		Required	Data Type	Definition
	NAICSType	Yes	Character (20)	Code defining the role of the NAICS code for the facility. Must be "SECONDARY" or "TERTIARY" in this table.
AlternativeFacilityName		No		Identifies any alternative names by which the facility site is known or has been known.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	AlternativeName	Yes	Character (80)	An alternative, historic, or program-specific name for the facility site. Required if reporting AlternativeFacilityName component.
	AlternativeNameProgram SystemCode	Yes	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeFacilityName component.
	AlternativeNameTypeText	Yes	Character (20)	The type of alternative, historical, or program-specific name for the facility site (e.g., primary, legal, historical, local). Required if reporting Alternative Facility Name component.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative name was first known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
AlternativeFacilityIdentification		No		Identifies any alternative identifiers by which the facility site is known or has been known.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of

Table/Data Element		Required	Data Type	Definition
				the United States. Required if reporting agency is State.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	AlternativeAgencyIdentifier	Yes	Character (80)	An identifier by which the facility site is or was known in a system.
	AlternativeFacilitySiteProgramSystemCode	Yes	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeFacilityIdentification table.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative identifier was first known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative Identifier was last known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
EmissionsUnit		Yes		Identifies an activity, stationary article, process equipment, machine, or other device from which air pollutants emanate or are emitted either directly or indirectly into the environment at the facility site.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	UnitIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in

Table/Data Element		Required	Data Type	Definition
				another system. Not required if reporting the EIS Unit Identifier.
	UnitProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISEmissionsUnitIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	UnitDescription	No	Character (100)	Text description of the emissions unit.
	UnitTypeCode	Yes	Character (20)	Code that identifies the type of emissions unit activity.
	UnitDesignCapacity	No	Float (3)	The measure of the size of the unit based on the maximum continuous throughput capacity of the unit.
	UnitDesignCapacityUnitofMeasureCode	(Yes)	Character (2)	Unit of measure for the design capacity of the emissions unit. Required if reporting Design Capacity.
	UnitStatusCode	Yes	Character (20)	Code that identifies the operating status of the emissions unit.
	UnitStatusCodeYear	(Yes)	Integer (4)	The year in which the unit status became applicable. Required if Unit Status Code is anything other than "OP" - operating. Must be between 1900-2050.
	UnitOperationDate	No	Date (YYYY-MM-DD)	The date on which unit activity became operational. Must be between 1900-01-01 and 2050-12-31
	PermitStatusCode	#	Character (20)	The operation status of a permit that applies to an emissions unit.
	PermitBeginYear	#	Integer (4)	The beginning year of a permit that applies to an emissions unit.
	PermitEndYear	#	Integer (4)	The ending year of a permit that applies to an emissions unit.
	UnitComment	No	Character (200)	Any comments regarding the emissions unit activity.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
	UnitIsReadOnly	#	Integer (1)	An indicator defining that no data for the unit may be changed
	DesignCapacityIsReadOnly	#	Integer (1)	Indicator defining that the design capacity information for a unit cannot be changed.
AlternativeUnitIdentification		No		Identifies any alternative identifiers by which the emissions unit is known or has been known.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the

Table/Data Element		Required	Data Type	Definition
				identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	UnitIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
	UnitProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISEmissionsUnitIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	AlternativeUnitIdentifier	(Yes)	Character (80)	An identifier by which the unit was previously known in a system.
	AlternativeUnitProgram SystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeUnitIdentification table.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative identifier was first known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative Identifier was last known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
Regulation		No		Identifies regulatory programs that are applicable to an emissions unit activity or process.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.

Table/Data Element		Required	Data Type	Definition
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	UnitIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
	UnitProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
	EmissionsProcessIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
	ProcessProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISEmissionUnitIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	EISEmissionsProcessIdentifier	No	Character (20)	An identifier by which the process is referred to by the EIS
	RegulatoryCode	Yes	Character (20)	The code that describes the regulation applicable to the emissions unit activity or process. Required if reporting the Regulatory component.
	AgencyCodeText	(Yes)	Character (100)	Text describing the non-federal regulation applicable to the emissions unit or process. Required if regulatory code indicates it is a non-Federal or a State program.
	RegulatoryStartYear	No	Integer (4)	The year in which the emissions unit or process became subject to the regulation. Format of YYYY between 1900-2050.
	RegulationComment	No	Character (400)	Comments regarding the regulation.
	RegulationIsReadOnly	#	Integer (1)	An indicator defining that no data for the regulation may be changed.
EmissionsProcess		Yes		Identifies the specific operational activities that produce emissions either directly or indirectly.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State

Table/Data Element	Required	Data Type	Definition
			or Local.
TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
UnitIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
UnitProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
EmissionsProcessIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
ProcessProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process Identifier.
EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
EISEmissionUnitIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
EISEmissionsProcessIdentifier	No	Character (20)	An identifier by which the process is referred to by the EIS
EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective.
EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable.
SourceClassificationCode	Yes	Character (20)	EPA Source Classification Code that identifies an emissions process.
AircraftEngineTypeCode	(Yes)	Character (20)	Identifies the combination of aircraft and engine type for airport emissions. Required if reporting airport emissions.
ProcessDescription	No	Character (200)	A text description of the emissions process.
ProcessStatusCode	Yes	Character (20)	Code that identifies the operating status of the emissions process.
ProcessStatusCodeYear	(Yes)	Integer (4)	The year in which the Process status became applicable. Required if Process Status Code is anything other than "OP" - operating. Must be between 1900-2050.
ProcessComment	No	Character (400)	Any comments regarding the emissions process.
IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
ProcessIsReadOnly	#	Integer (1)	Indicator that the process information cannot be changed.
AlternativeProcessIdentification	No		Identifies any alternative identifiers by which the emissions process is known or has been known.
FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a

Table/Data Element	Required	Data Type	Definition
			system. Not required if reporting the EIS Facility Identifier.
FacilitySiteProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
UnitIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
UnitProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
EmissionsProcessIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
ProcessProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process Identifier.
EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
EISEmissionUnitIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
EISEmissionsProcessIdentifier	No	Character (20)	An identifier by which the process is referred to by the EIS
AlternativeProcessIdentifier	(Yes)	Character (80)	An identifier by which the process was previously known in a system.
AlternativeProcessProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeProcessIdentification table.
EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective.
EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable.
IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
ReleasePoint	Yes		Identifies the point at which emissions are released into

Table/Data Element		Required	Data Type	Definition
				the environment, via a stack or fugitive release.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	ReleasePointIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Release point Identifier.
	ReleasePointProgram SystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Release Point Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISReleasePointIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable.
	ReleasePointTypeCode	Yes	Character (20)	Code that identifies the type of release point.
	ReleasePointDescription	No	Character (100)	Text description of release point.
	ReleasePointStackHeight Measure	(Yes)	Decimal (6,1)	The height of the stack from the ground measured in feet. Required if Release PointType is "Stack." Must be between 1 and 1300 inclusive.
	ReleasePointStackHeight UnitofMeasureCode	(Yes)	Character (20)	The stack height unit of measure. Required if Release Point Stack Height Measure is reported. Must be "FT".
	ReleasePointStackDiameter Measure	(Yes)	Decimal (5,1)	The internal diameter of the stack measured in feet at the release height. Required if Release Point Type is "Stack". Must be between 0.001 and 300 inclusive.
	ReleasePointStackDiameter UnitofMeasureCode	(Yes)	Character (20)	The stack diameter unit of measure. Required if Release Point Stack Diameter Measure is reported. Must be "FT".
	ReleasePointWidthMeasure	No	Integer (6)	The width measured in feet of a fugitive release in the East-West direction as if the angle is zero degrees; or the Width of a rectangular stack type release point. Must be between 1 and 10,000 inclusive for fugitive

Table/Data Element	Required	Data Type	Definition
			Width or between 0.1 and 100 inclusive for rectangular stack Width.
ReleasePointWidthUnitofMeasureCode	(Yes)	Character (20)	The width unit of measure code. Required if reporting Release Point Width Measure. Must be "FT".
ReleasePointLengthMeasure	No	Integer (6)	The length measured in feet of a fugitive release in the North-South direction as if the angle is zero degrees; or the Length of a rectangular stack type release point. Must be between 1 and 10,000 inclusive for fugitive Length or between 0.1 and 100 inclusive for rectangular stack Length.
ReleasePointLengthUnitofMeasureCode	(Yes)	Character (20)	The length unit of measure code. Required if reporting Release Point Length Measure. Must be "FT".
ReleasePointExitGasVelocityMeasure	(Yes)	Decimal (7,1)	The velocity of an exit gas stream. If Release Point Type is "Stack" then either Exit Gas Velocity Measure or Exit Gas Flow Rate is required. For stack type release, must be 0.001 to 1500, inclusive, if in FPS or 0.060 to 90,000 if in FPM. For fugitive type release, must be 0 to 400, inclusive, if in FPS or 0 to 24,000 if in FPM.
ReleasePointExitGasVelocityUnitofMeasureCode	(Yes)	Character (20)	The unit of measure for the velocity of an exit gas stream value. Required if Exit Gas Velocity Measure is reported. Must be either "FPM" or FPS".
ReleasePointExitGasFlowRateMeasure	(Yes)	Decimal (10,1)	The value of the stack gas flow rate. If Release Point Type Code is "Stack" then either Exit Gas Velocity Measure or Exit Gas Flow Rate is required. For either stack or fugitive type release, must be 0.00000001 to 200,000 ACFS, inclusive, if in ACFS or 0.00000001 to 12,000,000 if in ACFM.
ReleasePointExitGasFlowRateUnitofMeasureCode	(Yes)	Character (20)	The unit of measure for the stack gas flow rate value. Required if Release Point Exit Gas Flow Rate Measure is reported. Must be either "ACFM" or ACFS".
ReleasePointExitGasTemperatureMeasure	(Yes)	Integer (4)	The temperature of an exit gas stream (measured in degrees Fahrenheit). Required if Release Point Type is "Stack". Must be between -30 and 4000.
ReleasePointFenceLineDistanceMeasure.	No	Integer (6)	The measure of the horizontal distance measured in feet to the nearest fence line of a property within which the release point is located. Must be between 0 and 99,999, inclusive.
ReleasePointFenceLineDistanceUnitofMeasureCode	(Yes)	Character (20)	The fence line distance unit of measure. Required if reporting Release Point Fence Line Distance Measure. Must be "FT".
ReleasePointFugitiveHeightMeasure	No	Integer (3)	Fugitive Only. The fugitive release height measured in feet above terrain of fugitive emissions. Must be between 0 and 500 inclusive.
ReleasePointFugitiveHeightUnitofMeasureCode	(Yes)	Character (20)	Fugitive Only. The fugitive release height unit of measure. Must be "FT".
ReleasePointFugitiveAngleMeasure	No	Integer (3)	Fugitive Only. The orientation angle for the area in degrees from North, measured positive in the clockwise direction. Must be between 0 and 89 inclusive.

Table/Data Element	Required	Data Type	Definition
ReleasePointComment	No	Character (400)	Any comments regarding the release point.
ReleasePointStatusCode	Yes	Character (20)	Code that identifies the operating status of the release point.
ReleasePointStatusCode Year	(Yes)	Integer (4)	The year in which the release point status became applicable. Required if Release Point Status Code is anything other than "OP"- operating. Must be between 1900 - 2050
LatitudeMeasure	(Yes)	Decimal (8,5)	Required if release point coordinates are reported. The measure of the angular distance on a meridian north or south of the equator.
LongitudeMeasure	(Yes)	Decimal (8,5)	Required if release point coordinates are reported. The measure of the angular distance on a meridian east or west of the prime meridian.
MidPoint2LatitudeMeasure	(Yes)	Decimal (8,5)	Required if release point type is 2-D Fugitive. The measure of the angular distance on a meridian north or south of the equator.
MidPoint2Longitude Measure	(Yes)	Decimal (8,5)	Required if release point type is 2-D Fugitive. The measure of the angular distance on a meridian east or west of the prime meridian.
SourceMapScaleNumber	No	Integer (6)	The number that represents the proportional distance on the ground for one unit of measure on the map or photo.
HorizontalAccuracyMeasure	No	Integer (6)	The horizontal measure, in meters, of the relative accuracy of the latitude and longitude coordinates.
HorizontalAccuracyUnitof Measure	(Yes)	Character (20)	The horizontal accuracy unit of measure. Required if reporting Horizontal Accuracy Measure
HorizontalCollectionMethod Code	No	Character (3)	The code that identifies the method used to determine the latitude and longitude coordinates for a point on the earth.
HorizontalReferenceDatum Code	No	Character (3)	The code that represents the reference datum used in determining latitude and longitude coordinates.
GeographicReferencePoint Code	No	Character (3)	The code that represents the place for which geographic coordinates were established.
DataCollectionDate	No	Date (YYYY-MM-DD)	The calendar date when data were collected.
GeographicComment	No	Character (200)	The text that provides additional information about the geographic coordinates.
VerticalMeasure	No	Integer (6)	The measure of elevation (i.e., the altitude), above or below a reference datum.
VerticalUnitofMeasureCode	(Yes)	Character (20)	The vertical unit of measure. Required if reporting vertical measure
VerticalCollectionMethod Code	No	Character (3)	The code that identifies the method used to collect the vertical measure (i.e., the altitude) of a reference point.
VerticalReferenceDatum Code	No	Character (3)	The code that represents the reference datum used to determine the vertical measure (i.e., the altitude).
VerificationMethodCode	No	Character (3)	The code that represents the process used to verify the latitude and longitude coordinates.
CoordinateDataSourceCode	No	Character (3)	The code that represents the party responsible for providing the latitude and longitude coordinates.

Table/Data Element		Required	Data Type	Definition
	GeometricTypeCode	No	Character (3)	The code that represents the geometric entity represented by one point or a sequence of latitude and longitude points.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
	ReleasePointIsReadOnly	#	Integer (1)	Indicator that the release point information cannot be changed.
	StackHeightIsReadOnly	#	Integer (1)	Indicator that the stack height information cannot be changed.
	StackDiameterIsReadOnly	#	Integer (1)	Indicator that the release point stack diameter information cannot be changed.
	WidthIsReadOnly	#	Integer (1)	Indicator that the release point width information cannot be changed.
	LengthIsReadOnly	#	Integer (1)	Indicator that the release point length information cannot be changed.
	ExitGasVelocityIsReadOnly	#	Integer (1)	Indicator that the exit gas velocity information cannot be changed.
	ExitGasFlowRateIsReadOnly	#	Integer (1)	Indicator that the exit gas flow rate information cannot be changed.
	ExitGasTemperatureIsReadOnly	#	Integer (1)	Indicator that the exit gas temperature information cannot be changed.
	GeographicCoordinatesReadOnly	#	Integer (1)	The text that provides additional information about the geographic coordinates.
AlternativeReleasePoint Identification		No		Identifies any alternative identifiers by which the release point is known or has been known.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	ReleasePointIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Release Point Identifier.
	ReleasePointProgram SystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Release Point Identifier.

Table/Data Element		Required	Data Type	Definition
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISReleasePointIdentifier	No	Character (20)	An identifier by which the release point is referred to by the EIS.
	AlternativeReleasePointIdentifier	(Yes)	Character (80)	An identifier by which the release point was previously known in a system.
	AlternativeReleasePointProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeReleasePointIdentification table.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative identifier was first known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative Identifier was last known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
ReleasePointApportionment		Yes		The percent of emissions for an emissions process that are vented through the emissions release point.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	ReleasePointIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Release Point Identifier.
	ReleasePointProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Release Point Identifier.
	UnitIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit

Table/Data Element	Required	Data Type	Definition
			Identifier.
UnitProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
EmissionsProcessIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emissions Process Identifier.
ProcessProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Emission Process Identifier.
ReleasePointApportionment PathIdentifier	(Yes)	Character (20)	An identifier by which a path element is referred to in another system.
ReleasePointApportionment PathProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system.
EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
EISEmissionUnitIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
EISEmissionsProcess Identifier	No	Character (20)	An identifier by which the process is referred to by the EIS
EISReleasePointIdentifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
EISFacilitySitePathIdentifier	No	Character (20)	EIS Identifier for the facility site path as defined by the EIS System
AveragePercentEmissions	Yes	Decimal (5,2)	The average annual percent of an emissions process that is vented through a release point.
ReleasePointApportionment IsUncontrolled	No	Integer (1)	Indicator as to whether the release point apportionment is uncontrolled. Must be "Y" or "N" if reported.
ReleasePointApportionment Comment	No	Character (400)	Comment regarding the average apportionment of emissions vented through a release point.
PathDefinition	No		Identifies an activity, stationary article, process equipment, machine, or other device from which air pollutants emanate or are emitted either directly or indirectly into the environment at the facility site.
FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Facility Site Identifier
StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is

Table/Data Element		Required	Data Type	Definition
				Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (20)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	FacilitySiteControlPath Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControlPath Identifier.
	FacilitySiteControlPath ProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControlPath Identifier.
	ControlPathDefinition ControlIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS ControlPathDefinitionControl Identifier.
	ControlPathDefinition ControlProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the ControlPathDefinitionControlIdentifier.
	ControlPathDefinitionPath Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS ControlPathDefinitionPath Identifier.
	ControlPathDefinitionPath ProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the ControlPathDefinitionPathIdentifier.
	EISFacilitySiteIdentifier	No	Character (20)	EIS Identifier for the facility as defined by the EIS System.
	EISFacilitySiteControlPath Identifier	No	Character (20)	EIS Identifier for the facility site control as defined by the EIS System
	EISControlPathDefinition ControlIdentifier	No	Character (20)	EIS Identifier for the control path definition facility site control as defined by the EIS System.
	EISControlPathDefinition PathIdentifier	No	Character (20)	EIS Identifier for the control path definition facility site control path as defined by the EIS System.
	SequenceNumber	Yes	Integer (2)	Defines the order in which items are listed, for example: flow order for controls in the respective path.
	AveragePercent Apportionment	Yes	Decimal (5,2)	The average percent of an emissions flow that is vented through a control device (or control path).
SiteControl		No		Identifies an activity, stationary article, process equipment, machine, or other device from which air pollutants emanate or are emitted either directly or indirectly into the environment at the facility site.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked

Table/Data Element	Required	Data Type	Definition
			or interrelated information management system. Required if reporting Facility Site Identifier
StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
StateAndCountryFIPSCode	(Yes)	Character (20)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
FacilitySiteControlIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControl Identifier.
FacilitySiteControlProgram SystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControl Identifier.
EISFacilitySiteIdentifier	No	Character (20)	EIS Identifier for the facility as defined by the EIS System.
EISFacilitySiteControl Identifier	No	Character (20)	EIS Identifier for the facility site control as defined by the EIS System.
EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective.
EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable.
ControlMeasureCode	Yes	Character (20)	Code that identifies the piece of equipment or practice that is used to reduce one or more pollutants. Must be a valid code from the EIS Control Measure Code lookup table.
ControlDescription	No	Character (200)	Description of the control device used at a facility.
PercentControlEffectiveness	No	Decimal (6,3)	An estimate of portion of rep perd's activity which overall cntl sys (including both capture and control measures) were operating as designed (regardless of whether measure is due to rule or voluntary).
ControlUpgradeDate	No	Date (YYYY-MM-DD)	The date on which the control device was most recently updated.
ControlUpgradeDescription	No	Character (500)	Description of the control update performed for the control at a facility.
ControlStatusCode	Yes	Character (20)	Code that identifies the operating status of the facility site.
ControlStatusCodeYear	(Yes)	Integer (4)	The year in which the operating status became applicable. Required if control status is other than "OP".
ControlNumberOperating Months	No	Integer (2)	The number of months per year the control operates. Must be between 1 and 12 inclusive.
ControlStartDate	No	Date (YYYY-MM-DD)	Day the control was made effective.

Table/Data Element		Required	Data Type	Definition
	ControlEndDate	No	Date (YYYY-MM-DD)	Day the control was no longer used.
	ControlComment	No	Character (400)	Additional information about the control.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
	ControlsReadOnly	#	Integer (1)	Indicator defining that the control description information may not be altered.
AlternativeFacilitySiteControl Identification		No		Identifies any alternative identifiers by which the facility sitecontrol identification is known or has been known.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Facility Site Identifier
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	FacilitySiteControlIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControl Identifier.
	FacilitySiteControlProgram SystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControl Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISFacilitySiteControl Identifier	No	Character (20)	An identifier by which the FacilitySiteControl is referred to by the EIS.
	AlternativeFacilitySite ControlIdentifier	(Yes)	Character (80)	An identifier by which the FacilitySiteControl was previously known in a system.
	AlternativeFacilitySite ControlProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeFacilitySiteControlIdentification table.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative identifier was first known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	EndDate	No	Date (YYYY-	The date on which the corresponding alternative

Table/Data Element		Required	Data Type	Definition
			MM-DD)	Identifier was last known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
SiteControlPath		No		Identifies an activity, stationary article, process equipment, machine, or other device from which air pollutants emanate or are emitted either directly or indirectly into the environment at the facility site.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Facility Site Identifier
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (20)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	FacilitySiteControlPath Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControlPath Identifier.
	FacilitySiteControlPath ProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControlPath Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	EIS Identifier for the facility as defined by the EIS System.
	EISFacilitySiteControlPath Identifier	No	Character (20)	EIS Identifier for the facility site control path as defined by the EIS System.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the identifier became effective.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the identifier is no longer applicable.
	PathName	Yes	Character (20)	Common name given for a facility site path.
	PercentPathEffectiveness	No	Decimal (6,3)	Percent path effectiveness (ijn percentage format)
	PathDescription	No	Character (200)	Description of a collection of control devices.
	IdentifierIsReadOnly	#	Character	Indicator preventing the value of an alternate identifier from being modified.
	PathsIsReadOnly	#	Character	Indicator that the control path information cannot be changed.

Table/Data Element		Required	Data Type	Definition
AlternativeFacilitySiteControlPathIdentification		No		Identifies any alternative identifiers by which the facility site control path is known or has been known.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	FacilitySiteProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	FacilitySiteControlPathIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControlPath Identifier.
	FacilitySiteControlPathProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControlPath Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EISFacilitySiteControlPathIdentifier	No	Character (20)	An identifier by which the FacilitySiteControlPath is referred to by the EIS.
	AlternativeFacilitySiteControlPathIdentifier	(Yes)	Character (80)	An identifier by which the FacilitySiteControlPath was previously known in a system.
	AlternativeFacilitySiteControlPathProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting AlternativeFacilitySiteControlPathIdentification table.
	EffectiveDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative identifier was first known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	EndDate	No	Date (YYYY-MM-DD)	The date on which the corresponding alternative Identifier was last known or used in the context of the data or system. Must be between 1900-01-01 and 2050-12-31.
	IdentifierIsReadOnly	#	Integer (1)	Indicator preventing the value of an alternate identifier from being modified.
SiteControlPathPollutant		No		Identifies an activity, stationary article, process

Table/Data Element		Required	Data Type	Definition
				equipment, machine, or other device from which air pollutants emanate or are emitted either directly or indirectly into the environment at the facility site.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Facility Site Identifier
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	StateAndCountryFIPSCode	(Yes)	Character (20)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	FacilitySiteControlPath Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControlPath Identifier.
	FacilitySiteControlPath ProgramSystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControlPath Identifier.
	EISFacilitySiteIdentifier	No	Character (20)	EIS Identifier for the facility as defined by the EIS System.
	EISFacilitySiteControlPathIdentifier	No	Character (20)	EIS Identifier for the facility site control path as defined by the EIS System.
	PollutantCode	Yes	Character (20)	Code identifying the pollutant for which emissions are reported. Must be an active code in the EIS Pollutant Code lookup table.
	PercentControlMeasureReductionEfficiency	Yes	Decimal (6,3)	The percent reduction achieved for the pollutant when all control measures are operating as designed.
SiteControlPollutant		No		Identifies an activity, stationary article, process equipment, machine, or other device from which air pollutants emanate or are emitted either directly or indirectly into the environment at the facility site.
	FacilitySiteIdentifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required IF reporting the EIS Facility Site Identifier.
	FacilitySiteProgramSystem Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting Facility Site Identifier
	StateAndCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the

Table/Data Element	Required	Data Type	Definition
			identification of the Counties and County equivalents of the United States. Required if reporting agency is State or Local.
TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
StateAndCountryFIPSCode	(Yes)	Character (20)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
FacilitySiteControlIdentifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS FacilitySiteControl Identifier.
FacilitySiteControlProgram SystemCode	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the FacilitySiteControl Identifier.
EISFacilitySiteIdentifier	No	Character (20)	EIS Identifier for the facility as defined by the EIS System.
EISFacilitySiteControl Identifier	No	Character (20)	EIS Identifier for the facility site control as defined by the EIS System.
PollutantCode	Yes	Character (20)	Code identifying the pollutant for which emissions are reported. Must be an active code in the EIS Pollutant Code lookup table.
PercentControlMeasure ReductionEfficiency	Yes	Decimal (6,3)	The percent reduction achieved for the pollutant when all control measures are operating as designed.

TABLE A-16: POINT SOURCE ANNUAL EMISSIONS DATA ELEMENTS AND THEIR DESCRIPTIONS

Table/Data Element	Required	Data Type in EIS	Definition
DocumentHeader	Yes		Identification information regarding the submission file.
Author Name	Yes	Character (20)	Your name, not your user ID
Organization Name	Yes	Character (20)	The name of the organization which you are representing
Document Title	Yes	Character (3)	Must be "EIS"
Keywords	No	Character (100)	Words that best describe the payload. Multiple keywords should be separated by commas. This is for transaction categorization and searching.
Comment	No	Character (400)	Additional comments for processors
Data Flow Name	Yes	Character (20)	Must be "CERS_v2"
Property-Submission Type	Yes	Character (20)	Either "QA" or "Production"
Property-Data Category	Yes	Character (20)	Must be "Point" for point emissions submittals
Property-NCD Data File	No	Character (20)	The name of the NCD zipped file which is being attached. Not applicable to point emissions submittals.
UserIdentifier	Yes	Character (20)	User ID currently valid and recognized by EIS.

Table/Data Element		Required	Data Type in EIS	Definition
	ProgramSystemCode	Yes	Character (20)	The Program System Code for the Agency to whom the user id is a member with write privileges in EIS.
	EmissionsYear	Yes	Integer (4)	The 4-digit year of the submitted emissions.
	Model	No	Character (80)	The name of the model or the conversion tool used for generating the emissions data.
	ModelVersion	No	Character (20)	The version of the model or conversion tool.
	EmissionsCreationDate	No	Date (YYYY-MM-DD)	Date that the data being submitted were created, or the date when the model generating the data was run.
	SubmittalComment	No	Character (400)	Any comments regarding the file submission.
ReportingPeriod		Yes		Identifies the reporting period for which emissions and related activity data are submitted. Required when reporting Point Emissions
	Facility Site Identifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	Facility Site Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	State And County FIPS Code	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State.
	Tribal Code	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	State And Country FIPS Code	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	Unit Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
	Unit Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
	Emissions Process Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
	Process Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process Identifier.
	EIS Facility Site Identifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EIS Emission Unit Identifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	EIS Emissions Process Identifier	No	Character (20)	An identifier by which the process is referred to by the EIS
	Reporting Period Type Code	Yes	Character (20)	The time period type for which emissions are reported.

Table/Data Element		Required	Data Type in EIS	Definition
Emission Operating Type Code		Yes	Character (20)	Code identifying the operating state for the emissions being reported.
Start Date		(Yes)	Date (YYYYMMDD)	The date on which the reporting period began. Applies to the reporting of episodic only. Required if reporting episodic.
End Date		(Yes)	Date (YYYYMMDD)	The date on which the reporting period ended. Applies to the reporting of episodic only. Required if reporting episodic.
Calculation Parameter Type Code		(Yes)	Character (20)	Code indicating whether the material measured is an input to the process, an output of the process or a static count (not a throughput). Required if Calculation Parameter Value is reported.
Calculation Parameter Value		No	Float (10)	Activity or throughput of the process for a given time period. Maximum of 10 significant digits.
Calculation Parameter Unit of Measure		(Yes)	Character (20)	Code for the unit of measure for calculation parameter value. Required if Calculation Parameter Value is reported.
Calculation Material Code		(Yes)	Character (20)	Code for material or fuel processed. Required if Calculation Parameter Value is reported.
Calculation Data Year		No	Integer (4)	The actual year represented by the data if it is different from the emissions year. Format - YYYY. Must be between 1900 and 2050.
Calculation Data Source		No	Character (100)	The source of the data used.
Reporting Period Comment		No	Character (400)	Any comments regarding the reporting period.
OperatingDetails		No		Identifies the typical operating schedule for the process during the reporting period.
Facility Site Identifier		(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
Facility Site Program System Code		(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
State And County FIPS Code		(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State.
Tribal Code		(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
State And Country FIPS Code		(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
Unit Identifier		(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
Unit Program System Code		(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system.

Table/Data Element		Required	Data Type in EIS	Definition
				Required if reporting the Unit Identifier.
	Emissions Process Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
	Process Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process Identifier.
	EIS Facility Site Identifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EIS Emission Unit Identifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	EIS Emissions Process Identifier	No	Character (20)	An identifier by which the process is referred to by the EIS
	Reporting Period Type Code	Yes	Character (20)	The time period type for which emissions are reported.
	Emission Operating Type Code	Yes	Character (20)	Code identifying the operating state for the emissions being reported.
	Actual Hours Per Period	No	Integer (4)	Actual number of hours the process is active or operating during for the reporting period. Not to exceed 8784.
	Average Days Per Week	No	Decimal (4,1)	The average number of days per week that the emissions process is active within the reporting period. Not to exceed 7.
	Average Hours Per Day	No	Decimal (3, 1)	The average number of hours per day that the emissions process is active within the reporting period. Not to exceed 24.
	Average Weeks Per Period	No	Integer (2)	The average number of weeks that the emissions process is active within the reporting period. Not to exceed 52.
	Percent Winter Activity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the Winter months (December, January, February).
	Percent Spring Activity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the Spring months (March, April, May).
	Percent Summer Activity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the summer months (June, July, August).
	Percent Fall Activity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the Fall months (September, October, November).
SupplementalParameter		No		Identifies additional emissions calculation input parameters that are used for calculating emissions. SupplementalCalculationParameter must be associated with a fuel combustion SCC
	Facility Site Identifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	Facility Site Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.

Table/Data Element	Required	Data Type in EIS	Definition
State And County FIPS Code	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State.
Tribal Code	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
State And Country FIPS Code	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
Unit Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
Unit Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
Emissions Process Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
Process Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process Identifier.
EIS Facility Site Identifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
EIS Emission Unit Identifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
EIS Emissions Process Identifier	No	Character (20)	An identifier by which the process is referred to by the EIS
Reporting Period Type Code	Yes	Character (20)	The time period type for which emissions are reported.
Emission Operating Type Code	Yes	Character (20)	Code identifying the operating state for the emissions being reported.
Supplemental Calculation Parameter Type	Yes	Character (25)	Name of the parameter that describes the type of activity, throughput or input used in the calculation. Required if reporting the Supplemental Calculation Parameter component. Must be Heat Content, Percent Sulfur Content, or Percent Ash Content.
Supplemental Calculation Parameter Value	Yes	Float (5)	The value of the parameter. Required if reporting the Supplemental Calculation Parameter component.
Supplemental Calculation Parameter Numerator Unit of Measure Code	Yes	Character (20)	The numerator unit of measure for the parameter. Required if reporting Supplemental Calculation Parameter Value. If reporting Heat Content, numerator must be BTU or E6BTU
Supplemental Calculation Parameter Denominator Unit of Measure Code	No	Character (20)	The denominator unit of measure for the parameter.
Supplemental Calculation Parameter Data Year	No	Integer (4)	The year represented by the supplemental data if it is different from the emissions year. Format - YYYY. Must be between 1900 and 2050.

Table/Data Element		Required	Data Type in EIS	Definition
	Supplemental Calculation Parameter Data Source	No	Character (100)	The source of the supplemental parameter data used.
	Supplemental Calculation Parameter Comment	No	Character (400)	Any comments regarding the parameter.
Emissions		Yes		Identifies all pollutants being reported for the process and reporting period.
	Facility Site Identifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
	Facility Site Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
	State And County FIPS Code	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State.
	Tribal Code	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	State And Country FIPS Code	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
	Unit Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
	Unit Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
	Emissions Process Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
	Process Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process.
	EIS Facility Site Identifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
	EIS Emission Unit Identifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.
	EIS Emissions Process Identifier	No	Character (20)	An identifier by which the process is referred to by the EIS
	Reporting Period Type Code	Yes	Character (20)	The time period type for which emissions are reported.
	Emission Operating Type Code	Yes	Character (20)	Code identifying the operating state for the emissions being reported.
	Pollutant Code	Yes	Character (20)	Code identifying the pollutant for which emissions are reported.
	Total Emissions	Yes	Float (4)	Total calculated or estimated amount of the pollutant.
	Emissions Unit of Measure	Yes	Character (20)	Unit of measure for reported emissions.

Table/Data Element	Required	Data Type in EIS	Definition
Code			
Emission Factor	No	Float (4)	The emission factor used for the emissions value if a calculated value was provided.
Emission Factor Numerator Unit of Measure Code	(Yes)	Character (20)	The numerator for the unit of measure of the reported emission factor. Required if emission factor is reported.
Emission Factor Denominator Unit of Measure Code	(Yes)	Character (20)	The denominator for the unit of measure of the reported emission factor. Required if emission factor is reported.
Emission Factor Text	No	Character (100)	Explanation for emission factor.
Emission Calculation Method Code	Yes	Character (20)	Code that defines the method used to calculate emissions.
Emissions Comment	No	Character (400)	Any comments regarding the emissions, method of calculation, or emission factor.
DeleteReportingPeriod	No		
Facility Site Identifier	(Yes)	Character (20)	An identifier by which the facility site is referred to by a system. Not required if reporting the EIS Facility Identifier.
Facility Site Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Facility Site Identifier.
State And County FIPS Code	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State.
Tribal Code	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
State And Country FIPS Code	(Yes)	Character (5)	The code that represents a State and Country for States in Mexico and Provinces in Canada. Required if reporting agency is Mexico or Canada.
Unit Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Unit Identifier.
Unit Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Unit Identifier.
Emissions Process Identifier	(Yes)	Character (20)	An identifier by which an element is referred to in another system. Not required if reporting the EIS Emission Process.
Process Program System Code	(Yes)	Character (20)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system. Required if reporting the Emission Process.
EIS Facility Site Identifier	No	Character (20)	An identifier by which the facility is referred to by the EIS.
EIS Emission Unit Identifier	No	Character (20)	An identifier by which the unit is referred to by the EIS.

Table/Data Element		Required	Data Type in EIS	Definition
	EIS Emissions Process Identifier	No	Character (20)	An identifier by which the process is referred to by the EIS
	Reporting Period Type Code	Yes	Character (20)	The time period type for which emissions are reported.
	Emission Operating Type Code	Yes	Character (20)	Code identifying the operating state for the emissions being reported.

TABLE A-17: NONPOINT AND MOBILE SOURCE DATA ELEMENTS AND THEIR DESCRIPTIONS

Table/Data Element		Required	Data Type in EIS	Definition
DocumentHeader		Yes		Identification information regarding the submission file.
	Author Name	Yes	Character (20)	Your name, not your user ID
	Organization Name	Yes	Character (20)	The name of the organization which you are representing
	Document Title	Yes	Character (3)	Must be "EIS"
	Keywords	No	Character (100)	Words that best describe the payload. Multiple keywords should be separated by commas. This is for transaction categorization and searching.
	Comment	No	Character (400)	Additional comments for processors
	Data Flow Name	Yes	Character (20)	Must be "CERS_v2"
	Property-Submission Type	Yes	Character (20)	Either "QA" or "Production"
	Property-Data Category	Yes	Character (20)	Must be "Nonpoint" or "Onroad" or "Nonroad"
	Property-NCD Data File	No	Character (20)	The name of the NCD zipped file which is being attached. For mobile source reporting of MOVES inputs.
	UserIdentifier	Yes	Character (20)	User ID currently valid and recognized by EIS.
	ProgramSystemCode	Yes	Character (20)	The Program System Code for the Agency to whom the user id is a member with write privileges in EIS.
	EmissionsYear	Yes	Integer (4)	The 4-digit year of the submitted emissions.
	Model	No	Character (80)	The name of the model or the conversion tool used for generating the emissions data.
	ModelVersion	No	Character (20)	The version of the model or conversion tool.
	EmissionsCreationDate	No	Date (YYYY-MM-DD)	Date that the data being submitted were created, or the date when the model generating the data was run.
	SubmittalComment	No	Character (400)	Any comments regarding the file submission.
Location		Yes		Identifies the state/county, tribe, or shape for which the data is being reported
	StateandCountyFIPSCode	(Yes)	Character (5)	The list is from FIPS Counties codes used for the identification of the Counties and County equivalents of the United States. Required if reporting agency is State.
	TribalCode	(Yes)	Character (3)	The code that represents the American Indian Tribe or Alaskan Native entity. Required if reporting agency is Tribal.
	ShapeIdentifier	(Yes)	Character (20)	The shape file identifier issued by EPA for a predefined geospatial shape.

Table/Data Element		Required	Data Type in EIS	Definition
	LocationComment	No	Character (400)	Any comments regarding the location
LocationEmissionsProcess		Yes		Identifies the specific operational activities that produce emissions either directly or indirectly.
	SourceClassificationCode	Yes	Character (20)	EPA Source Classification Code that identifies an emissions process.
	EmissionsTypeCode	(Yes)	Integer	Defines the type of emissions produced by Onroad and Nonroad sources. Used for Mobile sources only. Examples include exhaust, evaporative and tire wear. Required when reporting the process component for nonroad.
	ProcessComment	No	Character (400)	Any comments regarding the emissions process.
ProcessRegulation		No		
	RegulatoryCode	No	Integer	The code that describes the regulation applicable to the emissions unit activity or process.
	AgencyCodeText	No	Character (100)	Text describing the non-federal regulation applicable to the emissions unit or process.
	RegulationComment	No	Character (400)	Comments regarding the regulation.
ProcessControlApproach		No		
	ControlApproachDescription	No	Character (200)	Identifies the overall control system or approach, including capture effectiveness, where applied at an emissions unit activity or process to reduce the amount of pollutants released into the environment.
	PercentControlApproach CaptureEfficiency	No	Float (5.1)	An estimate of that portion of an affected emission stream that is collected and routed to the control measures when the capture or collection system is operating as designed, reported as a percent.
	PercentControlApproach Effectiveness	No	Float (5.1)	An estimate of the portion of the reporting period's activity for which the overall control system or approach (including both capture and control measures) were operating as designed (regardless of whether the control measure is due to rule or voluntary).
	PercentControlApproach Penetration	No	Float (5.1)	An estimate of the percent value of the nonpoint activity throughput that is affected by a rule or voluntary approach for the given location. (Nonpoint only.)
	ControlApproachComment	No	Character (400)	Comments regarding the control approach
ControlMeasure		No		
	ControlMeasureCode	Yes	Character (20)	Identifies the specific control devices or practices that are applied to an emission stream after capture and routing.

Table/Data Element		Required	Data Type in EIS	Definition
ControlPollutant		(Yes)		Required if have ControlMeasure
	PollutantCode	Yes	Character (20)	Code identifying the pollutant for which emissions are reported.
	PercentControlMeasure ReductionEfficiency	Yes	Float (5.1)	The code that represents the information management system which has responsibility for the data in a linked or interrelated information management system
ReportingPeriod		Yes		
	ReportingPeriodTypeCode	Yes	Character (20)	The time period type for which emissions are reported.
	EmissionsOperatingType Code	Yes	Character (20)	Code identifying the operating state for the emissions being reported.
	StartDate	(Yes)	Date (YYYYMMDD)	The date on which the identifier begins.
	EndDate	(Yes)	Date (YYYYMMDD)	The date on which the identifier is no longer applicable.
	CalculationParameterType Code	(Yes)	Integer	Code indicating whether the material measured is an input to the process, an output of the process or a static count (not a throughput).
	CalculationParameterValue	No	Float (6)	Activity or throughput of the process for a given time period.
	CalculationParameterUnitof Measure	(Yes)	Integer	Code for the unit of measure for calculation parameter value.
	CalculationMaterialCode	(Yes)	Integer	Code for material or fuel processed.
	CalculationDataYear	No	Integer	The actual year represented by the data if it is different from the emissions year.
	CalculationDataSource	No	Character (100)	The source of the data used
	ReportingPeriodComment	No	Character (400)	A comment regarding the reporting period.
OperatingDetails		No		
	PercentWinterActivity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the Winter months (December, January, February).
	PercentSpringActivity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the Spring months (March, April, May).
	PercentSummerActivity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the summer months (June, July, August).
	PercentFallActivity	No	Decimal (5,1)	The percentage of the annual activity that occurred during the Fall months (September, October, November).
SupplementalCalculation Parameter		(Yes)		Required if any supplemental calculations
	SupplementalCalculation ParameterType	Yes	Character (25)	Name of the parameter that describes the type of activity, throughput or input used in the calculation.

Table/Data Element		Required	Data Type in EIS	Definition
	SupplementalCalculationParameterValue	Yes	Float (5)	The value of the parameter.
	SupplementalCalculationParameterNumeratorUnitofMeasureCode	Yes	Character (20)	The numerator unit of measure for the parameter.
	SupplementalCalculationParameterDenominatorUnitofMeasureCode	No	Character (20)	The denominator unit of measure for the parameter.
	SupplementalCalculationParameterDataYear	No	Integer (4)	The year represented by the supplemental data if it is different from the emissions year.
	SupplementalCalculationParameterDataSource	No	Character (100)	The source of the supplemental parameter data used.
	SupplementalCalculationParameterComment	No	Character (400)	Any comments regarding the parameter.
ReportingPeriodEmissions		Yes		
	TotalEmissions	Yes	Float (4)	Total calculated or estimated amount of the pollutant.
	EmissionsUnitofMeasureCode	Yes	Character (20)	Unit of measure for reported emissions.
	EmissionFactor	No	Float (4)	The emission factor used for the emissions value if a calculated value was provided.
	EmissionFactorNumeratorUnitofMeasureCode	(Yes)	Character (20)	The numerator for the unit of measure of the reported emission factor.
	EmissionFactorDenominatorUnitofMeasureCode	(Yes)	Character (20)	The denominator for the unit of measure of the reported emission factor.
	EmissionFactorText	No	Character (100)	Explanation for emission factor.
	EmissionCalculationMethodCode	Yes	Character (20)	Code that defines the method used to calculate emissions.
	EmissionsComment	No	Character (400)	Any comments regarding the emissions, method of calculation, or emission factor.

TABLE A-18: LIST OF DATA ELEMENTS FOR PROVIDING WILDLAND FIRE DATA

Data Element ^a	Units	Required? ^b	Description
Latitude	Decimal	Y	Best estimate of latitude location
Longitude	Decimal	Y	Best estimate of longitude location
Area	Acres	Y	Final size of fire, preferably "blackened" acres
Start Date	MM/DD/YYYY	Y	First detection date of fire
End Date	MM/DD/YYYY	Y	Last date fire was active
Type	n/a	Y	Primary fire type. Enter WF for wildfire, RX for prescribed fire, and AG for crops-related burning
Centroid used Y/N	n/a	N	Enter Y if county centroid was used for the location and N if it was not
FCCS	n/a	N	Enter the standard fuel characteristics

			classification system (FCCS) number, available at: https://landfire.gov/sites/default/files/CSV/LF2020/LF20_FCCS_220.csv
Duff depth	Inches	N	Depth of the fuels below the ground surface
Fuel moisture	Percent	N	The moisture content of the fuel consumed by the fire

^a If perimeter information is available for wildland fires, we would prefer polygon input as Geographic Information System (GIS) Shapefiles in place of comma separated value (CSV) files.

^b The wildfire data are not required by the AERR, but if provided, the data elements marked “required” in this table are necessary so that the EPA can use the data.

TABLE A-5: LIST OF DATA ELEMENTS FOR PROVIDING PILE BURN DATA

Data Element ^a	Units	Required? ^b	Description
Latitude	Decimal	Y	Best estimate of latitude location
Longitude	Decimal	Y	Best estimate of longitude location
Start Date	MM/DD/YYYY	Y	First detection date of fire
End Date	MM/DD/YYYY	Y	Last date fire was active
Type	n/a	Y	Primary fire type. Enter RX for prescribed fire, and AG for crops-related burning
Centroid used Y/N	n/a	N	Enter Y if county centroid was used for the location and N if it was not
FCCS	n/a	N	Enter the standard fuel characteristics classification system (FCCS) number, available at: https://landfire.gov/sites/default/files/CSV/LF2020/LF20_FCCS_220.csv
Area	Acres	(Y) ^a	The area from which the fuel was collected that was used to create the pile
Geometry/Shape of the Pile(s)	n/a	(Y) ^a	Description of the shape of the pile using any units of measure, for example, length/width/height or diameter
Tons consumed	Tons	(Y) ^a	Tons of fuel consumed by burning the piles
Number of piles	n/a	(Y) ^a	Number of piles burned in the burning event
Tons per pile	Tons	(Y) ^a	When number of piles provided, the average weight of fuel per pile
Type of pile	n/a	(Y) ^a	When number of piles provided, whether the pile(s) were created with a bulldozer, other machine, or by hand
Fuel moisture	Percent	N	The moisture content of the fuel consumed by the fire

^a For the data to be used, provide either (a) the area or (b) the total tons consumed, (c) the number of piles and tons per pile, or (d) the number of piles, average pile geometry or volume, and optionally the type of pile.

^b The wildfire data are not required by the AERR, but if provided, the data elements marked “required” in this table are necessary so that the EPA can use the data.

TABLE A-6: EXAMPLE DATA PROVIDED TO STATES FOR VOLUNTARY REVIEW AND COMMENT

Data Element	Description
date	Date of fire in YYYYMMDD format
id	Fire ID used for tracking in fire processing
event_id	Event ID used for tracking in Bluesky Pipeline
event_name	Fire name (this name can be inaccurate for large fires that use many different activity sources when reconciling)
latitude	Degrees North in decimal format
longitude	Degrees West in decimal format
type	WF = Wildfires, RX=prescribed burn (broadcast), PB=Pile burn
area	acres burned
fips	State and county Federal Information Processing Standards (FIPS) Code
state	State name
county	County name
scc	Source Category Code: note acres will the same for flaming and smoldering SCCs so be careful when totalling acres/area
consumption_flaming	Consumption in tons during flaming phase
consumption_smoldering	Consumption in tons during smoldering phase during flaming phase
consumption_residual	Consumption in tons during smoldering phase AFTER flaming phase
heat	Heat flux used in plume rise in <units>
fccs_number	FCCS fuel ID number (see https://landfire.gov/sites/default/files/CSV/LF2020/LF20_FCCS_220.csv)
fuelbed_fractions	FCCS fuel bed fractions which should add up to 1.0 (e.g. 25 0.5; 78 0.5 = FCCS fuel #25 50% + FCCS fuel #78 50% of the fuels burned)
PM2.5	PM2.5 Emissions (tons)
PM10	PM10 Emissions (tons)
CO	CO Emissions (tons)
CO2	CO2 Emissions (tons)
CH4	CH4 Emissions (tons)
NOX	NOX Emissions (tons)
NH3	NH3 Emissions (tons)
SO2	SO2 Emissions (tons)
VOC	VOC Emissions (tons)
100425	Styrene Emissions (tons)
106990	1,3-Butadiene Emissions (tons)
107028	Acrolein Emissions (tons)
108883	Toluene Emissions (tons)
110543	Hexane Emissions (tons)
120127	Anthracene Emissions (tons)
129000	Pyrene Emissions (tons)
1330207	Xylenes (Mixed Isomers) Emissions (tons)
191242	Benzo[g,h,i]Perylene Emissions (tons)

192972	Benzo[e]Pyrene Emissions (tons)
193395	Indeno[1,2,3-c,d]Pyrene Emissions (tons)
195197	Benzo(c)phenanthrene Emissions (tons)
203338	Benzo(a)Fluoranthene Emissions (tons)
206440	Fluoranthene Emissions (tons)
207089	Benzo[k]Fluoranthene Emissions (tons)
218019	Chrysene Emissions (tons)
26914181	Methylanthracene Emissions (tons)
41637905	Methylchrysene Emissions (tons)
463581	Carbonyl Sulfide Emissions (tons)
50000	Formaldehyde Emissions (tons)
50328	Benzo[a]Pyrene Emissions (tons)
56553	Benz[a]Anthracene Emissions (tons)
56832736	Benzo(a)fluoranthene Emissions (tons)
65357699	Methylbenzopyrene Emissions (tons)
67561	Methanol Emissions (tons)
71432	Benzene Emissions (tons)
74873	Methyl Chloride Emissions (tons)
75058	Acetonitrile Emissions (tons)
75070	Acetaldehyde Emissions (tons)
79107	Acrylic Acid Emissions (tons)
85018	Phenanthrene Emissions (tons)
91203	Naphthalene Emissions (tons)
95476	o-Xylene Emissions (tons)
sources	Activity sources reconciled that make up this specific fire for specific day
scc_description	SCC description