

ICIS-Air EDT General Submission Questions

October 15, 2014

The following Questions and Answers describe each area of concern for ICIS-Air Electronic Data Transfer, the issues they may pose, and what can be done to mitigate any negative impacts.

OVERALL QUESTIONS

Question #1: I plan to maintain some of my data families in ICIS-Air using EDT but will be maintaining other data families using the ICIS-Air web application. Will this cause problems?

Answer: The following data families can be submitted electronically to ICIS-Air as discreet, independent records:

Air Facility, Air Program, Air Pollutant, Compliance Monitoring Strategy, Compliance Monitoring (including stack tests, PCEs, FCEs), TVACC, Formal Enforcement Action, Informal Enforcement Action, Enforcement Action Milestone (Formal EAs only), Case File, Compliance Monitoring Linkages (with other actions), Enforcement Action Linkages (with other actions), and Case File Linkages (with other actions).

ICIS-Air EDT allows you to maintain each of these data families as their own XML submission type. As long as you always maintain one or more data families via EDT and the other(s) using the ICIS-Air web application there will be no problem. For example: Submission of Air Facility data using EDT and manually entering enforcement actions into ICIS-Air will never cause a problem because they are considered to be two separate data families by ICIS-Air EDT.

Note that if you delete a record or linkage between records in ICIS-Air using the web application you will need to either delete the record or linkage from your air system too, or exclude it from the EDT extractions of your air data so your ICIS-Air plug-in does not create an XML containing a Replace transaction that will add the record or linkage back into ICIS-Air.

Question #2: I batch data to AFS but sometimes my Regional Air Coordinator logs into AFS and enters data into a field or two of my records. Will this be a problem when I start using ICIS-Air EDT?

Answer: Yes. Because ICIS-Air only allows Replace transactions, if you submit changes from your air system to a record that is currently storing data entered by your Regional Air Coordinator in ICIS-Air and your changes do not include the tag(s) for their data, that data will be blanked out in ICIS-Air by the EDT code. Your Regional Air Coordinator will either have to go into ICIS-Air and enter that data into the newly modified record again, or you will need to work out an agreement with your Regional Air Coordinator to have them provide you with that data and store it in your air system so it can be sent to ICIS-Air via EDT as part of your data each time.

If your Region enters the TV ACC Due and/or Received Dates under agreement between you and your Region, be sure to submit your data via EDT and either coordinate with your Region to enter their dates or consider using ICIS-Air web data entry for TV ACCs instead. Do not create a new PCE TV ACC record if you are in such an agreement with your Region.

If a Region enters a TVACC record via the Web with only a Planned End Date and you submit an update to that record that contains the Actual End Date but not the Planned End Date that the Region entered, ICIS-Air EDT will 'blank out' the Planned End Date entered by the Region. You should include the Planned End Date the Region

entered via the Web in your XML submission to avoid blanking it out, or coordinate with your Region to re-enter their date.

Question #3: I batch data to AFS monthly or less frequently, then use manual data entry to meet reporting deadlines every once in a while. Can I continue to do this for ICIS-Air?

Answer: As long as the manually entered ICIS-Air data gets stored in your air system before your next EDT submission of this data it will not be a problem. Otherwise, if the next EDT data transfer contains Replace transactions for the record(s) that were manually entered and the manually entered data is missing, that manually entered data will be blanked out and you will need to log into ICIS-Air and manually re-enter this data.

Question #4: The AFS batch process does not always work properly so I log into AFS and enter data that did not make it or was stored incorrectly. Can I continue to do this for ICIS-Air?

Answer: ICIS-Air EDT makes it easier to transfer your data to EPA automatically, and each piece of data is assigned to a tag or element specifically for it which cuts down on accidental misplacement of data typical of 80 column card files. As long as the data from your air system is mapped correctly into the ICIS-Air XML tags, substitutes the correct ICIS-Air reference table codes where appropriate, and is in the format required by the ICIS-Air XML element tags you should have no need to manually enter your data into ICIS-Air.

Question #5: I find that entering data into AFS is easier than submitting batches for some of my data. Will this be the case for ICIS-Air too?

Answer: If you will be using a Node plug-in for ICIS-Air, such as one being developed for the ENNode, OpenNode2 or Virtual Node, you only need to accurately map the fields in your air system to the fields in the staging tables once and the plug-in can handle the rest of your data extractions and submissions to ICIS-AIR for you from that point forward. If you choose to create your own XMLs, Microsoft's Excel software has a feature that can be purchased separately able to transform cells into an XML file. The resulting XML file will need to be modified into the format required by ICIS-Air before it can be manually upload using the Exchange Network Services Center web form. Both of these procedures should save you more time than logging into ICIS-Air and entering the data manually.

Question #6: My air system does not store one or more of the fields in AFS, so I batch the fields that we store then enter the unstored data manually into AFS. What will happen if I do this for ICIS-Air?

Answer: ICIS-Air uses replace transactions that will blank out any fields that are not provided in a submission. You have four options to avoid this problem:

- 1) Manually re-enter the data for the field(s) into ICIS-Air after an EDT submission that results in overwriting the affected record(s) has finished.
- 2) If it is a field that uses the same fixed value for all of your records in ICIS-Air, such as always using a zip code value of "00000" when the zip code is missing from your air system, then hardcode that fixed value into the SQLs or procedures that extract data out of your air system so it can place the data into your ICIS-Air plug-in staging tables.
- 3) Obtain funding and resources to store the missing field(s) to your air system
- 4) If this data is going to be rarely added to or maintained in ICIS-Air then consider always entering data for that particular data family into ICIS-Air manually instead of using EDT. For example: you may have Formal Enforcement Actions that have penalty data that you do not store in your system and your agency only has approximately 10 Formal administrative and judicial Enforcement Actions that need to be added

or changed in ICIS-Air each year. Use the ICIS-Air web form to manually enter and change all of your Formal Enforcement Actions, and never use EDT to do this.

AFS PLANT QUESTIONS

Question #7: I am unclear on how identifiers will be assigned to my AFS plant level records when they migrate to ICIS-Air, and how they will be provided to ICIS-Air via web data entry and EDT submissions. How will all of this be handled?

Answer:

AFS ID Migration Behavior

During the migration of AFS Plant records into ICIS-Air Air Facility records:

- ICIS-Air will assign an Air Facility Identifier for each AFS state, local, tribal or Federal plant record using a combination of the 2 character state postal code or Tribal code + ICIS-Air LCON code or '000' + '000'+ AFS FIPS State Code + AFS FIPS County Code + AFS CDS ID as a default (e.g., AK0000000200112345)
- OR
- If a state, local or tribal agency wants to migrate the record with their own identifier instead of allowing ICIS-Air to default it for them, they can provide their own 12 character identifiers in an AFS Plant Comment 750 record that will be appended to the end of the 2 character state postal code or Tribal code + ICIS-Air LCON code or '000' + '0' by the AFS migration code (e.g., AK0000ABCDEF123456). *If an identifier is less than 12 characters, it must be padded with zeroes at the front or end of the identifier to make the total length of the identifier 12 characters.*

ICIS-Air ID System Behavior

For Air Facility Identifiers of new records, agencies must enter or provide via EDT an alphanumeric Air Facility Identifier of their own choice that starts with their 2 character State postal or Tribal code followed by '000' or an LCON code, then a unique alphanumeric string can be up to 18 characters long in total length (e.g., AK0001234567890123).

Instructions on ICIS-Air Identifier assignments and populating AFS Plant Comment 750 are provided in PDF files attached to each AFS Migration Workgroup call invitation.

An identifier must be unique, or you risk having your ICIS-Air records overwritten with data from the wrong records out of your air system.

Also keep in mind that you must take extra steps when loading the staging tables of an OpenNode2 or enNode plug-in with data from ICIS-Air to remove all air facilities that belong to your Region so the plug-in does not create Mass Delete transactions to remove their air facility records from ICIS-Air.

Question #8: When one of my AFS plants has a name change I create an Action record to store the old name for historical purposes before changing the plant record to the new name. Can I do this in ICIS-Air EDT too?

Answer: No. You will need to submit a Replace transaction for the Air Facility with <FacilitySiteName> containing the new name of the Facility. ICIS-Air EDT will automatically store the previous name to the history table. Users don't populate or submit the history, and no extra work by the user is needed. So, the history of the site name is maintained in ICIS.

Question #9: When one of my AFS plants has a new owner, operator or other contact how can I use ICIS-Air EDT submissions to make sure the old owner or operator remains in ICIS-Air?

Answer: Most of the time, an agency has their own air system that stores this information and only provides the most current owner, operator and/or contact by submitting a Replace transaction for the Air Facility containing one <Contact> tag for each person that needs to be stored in ICIS-Air under the parent <FacilityContact> tag. To keep older owners, operators and/or contacts in ICIS-Air you will need to submit each old owner, operator or contact with their own <Contact> tag along with the current owner, operator and/or contacts in their own <Contact> tag each time you send in a Replace transaction for that Air Facility.

AFS ACTION QUESTIONS

Question #10: I am unclear on how identifiers will be assigned to my AFS action records when they migrate to ICIS-Air. How will all of this be handled?

Answer:

AFS ID Migration Behavior

During the migration of AFS Action records into ICIS-Air Compliance Monitoring, Enforcement Action and Case File records:

- ICIS-Air will assign Compliance Monitoring and Case File identifiers for each AFS action record using a combination of the 2 character state postal code or Tribal code or Federal region number + ICIS-Air LCON code or '000' + 'A' for state, local or tribal agency or 'F' for Federal + AFS FIPS State Code + AFS FIPS County Code + '0000' + AFS CDS ID + AFS Action Number as a default (e.g., AK000A0000020011234512345)
- ICIS-Air will assign Enforcement Action identifiers for each AFS state, local or tribal agency action record using a combination of the 2 character state postal code or Tribal code + ICIS-Air LCON code or '000' + 'A' + '0000' + AFS FIPS State Code + AFS FIPS County Code + AFS CDS ID + AFS Action Number as a default (e.g., AK000A0000020011234512346)
- ICIS-Air will assign Enforcement Action identifiers for each AFS Federal action record using a combination of the Federal region number + '-' + Fiscal Year + '-A' + sequential number from 001 up to 999 as a default (e.g., 01-2014-A001)

OR

- If a state, local or tribal agency wants to migrate the record with their own identifier instead of allowing ICIS-Air to default it for them, they can provide their own 15 character identifiers into an AFS Plant Comment 752 record that will be appended to the end of the 2 character state postal code or Tribal code + ICIS-Air LCON code or '000' + 'A' + '0000' by the AFS migration code (e.g., AK000A0000123456789012345) *If an identifier is less than 15 characters, it must be padded with zeroes at the front or end of the identifier to make the total length of the identifier 15 characters.*

ICIS-Air ID System Behavior

For compliance monitoring, enforcement action and case file identifiers, agencies using the web to add new records currently cannot enter identifiers but must allow ICIS-Air to assign them. Agencies using EDT must provide their own alphanumeric Air Facility Identifier that starts with their 2 character State postal code or Tribal code followed by '000' or an LCON code + 'A', then a unique alphanumeric string that can be up to 25 characters long in total length (e.g., AK000A1234567890123456789).

Instructions on ICIS-Air Identifier assignments and populating AFS Plant Comment 752 are provided in PDF files attached to each AFS Migration Workgroup call invitation.

An identifier must be unique, or you risk having your ICIS-Air records overwritten with data from the wrong records out of your air system. This is especially true for Compliance Monitoring Identifiers, Enforcement Action Identifiers and Case File Identifiers which are stored in the same ICIS-Air “Activity” table. Because of this, EDT agencies may want to use a character in their record’s identifier to denote the record is for a stack test (AK000AS1234567890123456789), case file (AK000AC1234567890123456789), formal enforcement action (AK000AF1234567890123456789), information enforcement action (AK000AI1234567890123456789), TV ACC (AK000AT1234567890123456789), or other compliance monitoring activity such as PCE, FCE, etc.(AK000AM1234567890123456789).

Question #11: My air system does not use AFS Action Numbers so I have AFS or the Universal Interface generate them for me. Can I continue to do this for ICIS-Air?

Answer: ICIS-Air EDT does not generate Action Identifiers and will require you to provide unique identifiers for each air facility, compliance monitoring, enforcement action and case file record you need to have stored and maintained within ICIS-Air. See Question #10 for details regarding the assignment of these identifiers.

When AFS action data is migrated to ICIS-Air, linkages between a State Case File record and a Federal enforcement action are being created for certain situations. After ICIS-Air goes into production, Federal users may create linkages between State Case File, Compliance Monitoring, TVACC and Enforcement Action Records and Federal Case File, Compliance Monitoring, TVACC or Enforcement Action records using the online web application.

In order to maintain data in ICIS-Air that was migrated from AFS data and created by entering new records into ICIS-Air using direct data entry via the ICIS-Air web pages with linkages to Federal activities, EDT agencies need to use mappings of their agency record identifiers into ICIS-Air identifiers to submit to ICIS-Air EDT that can be properly found and updated as needed.

ICIS-Air EDT agencies without mappings to provide ICIS-Air Compliance Monitoring, Enforcement Action and Case File Identifiers run the risk of having their migrated data deleted from ICIS-Air, or having duplicate compliance and enforcement data reside in ICIS-Air depending upon whether they are using an OpenNode2 or enNode plug-in with change detection capability or not.

The plug-in with change detection capability compares the data within the two sets of staging tables using the agency data as the master source to create Mass Delete transactions for ICIS-Air records that do not exist in the agency data and replace transactions for agency data that does not exist in ICIS-Air. By not having mapping to provide the agency staging tables with the ICIS-Air IDs, the plug-in will delete all of the agency’s migrated data out of ICIS-Air, then reload ICIS-Air with agency data containing the state identifiers only.

The plug-in or customized code that does not use change detection capability will simply load all of the state data into ICIS-Air with much of it already having been migrated from AFS still sitting in ICIS-Air, resulting in duplications.

There are three proposed solutions for handling state and local agencies without mappings of state identifiers into ICIS-Air identifiers.

Solution #1

Agency does not use EDT to maintain AFS migrated and any pre-EDT web entered ICIS-Air data.

1. Agency does not pre-load ICIS-Air staging tables for their plug-in but only loads the data from their agency air database into the staging tables that is new as of the date they plan to start EDT or has been changed but was created after the date they plan to start EDT.
2. Agency uses the ICIS-Air data entry web pages to change data that was migrated from AFS and data that was entered into ICIS-Air before they started providing EDT submissions.

Solution #2

Agency creates mappings of their agency record identifiers into ICIS-Air Compliance Monitoring, Enforcement Action and Case File Identifiers for AFS and ICIS-Air web entered data using a time period determined by their Region with HQ EPA approval.

1. EPA provides agency with methodology used for identifying AFS records that were migrated into ICIS-Air compliance monitoring, enforcement action and case file records.
2. Agency uses identifying information plus AFS pollutant code, action type and date achieved to compare against the data in their state system and create mappings.
3. Agency uses ICIS-Air Business Objects to extract identifiers for ICIS-Air compliance monitoring, enforcement action and case file records that were entered into ICIS-Air after their AFS data was migrated and before they start their EDT submissions to add to the mappings. (Contact ICIS Customer Support for assistance with Business Objects reports).
4. Agency starts using EDT by utilizing the mappings of AFS migrated data and data that was entered into ICIS-Air before they started providing EDT submissions to provide the appropriate ICIS-Air identifiers for maintaining this data in ICIS-Air.

Solution #3

Agency only creates mappings for ICIS-Air activities that are linked to Federal activities and uses it to restore linkages.

1. Agency extracts migrated and pre-EDT data from ICIS-Air that are linked to one or more Federal activity.
2. Agency uses identifying information plus pollutant code, action type and date achieved to compare against the data in their agency system and create mappings.
3. Agency allows plug-in to create delete transactions for migrated and pre-EDT activities in ICISAir.
4. Agency reloads activities with their own Identifiers into ICIS-Air.
5. Agency uses the mapping to re-link their activities to the appropriate Federal activity/activities.

Question #12: I let AFS assign identifiers for my records because my air system does not have identifiers. Should I match up my identifiers, and if so, how can I match up the records in my air system with the appropriate AFS records so I can begin storing the correct AFS identifier and maintain my data in ICIS-Air after it has been migrated?

Answer:

There are three proposed solutions for State, Tribal and Local agencies that do not currently store the same identifiers that ICIS-Air has for their records:

Solution #1

Agency does not use EDT to maintain AFS migrated and any pre-EDT web entered ICIS-Air data.

1. Agency does not pre-load ICIS-Air staging tables for their plug-in but only loads the data from their agency air database into the staging tables that is new as of the date they plan to start EDT or has been changed but was created after the date they plan to start EDT.
2. Agency uses the ICIS-Air data entry web pages to change data that was migrated from AFS and data that was entered into ICIS-Air before they started providing EDT submissions.

Solution #2

Agency creates mappings of their agency record identifiers into ICIS-Air Compliance Monitoring, Enforcement Action and Case File Identifiers for AFS and ICIS-Air web entered data using a time period determined by their Region with HQ EPA approval.

1. EPA Region provides agency with methodology used for identifying AFS records that were migrated into ICIS-Air compliance monitoring, enforcement action and case file records.
2. Agency uses identifying information plus AFS pollutant code, action type and date achieved to compare against the data in their state system and create mappings.
3. Agency uses ICIS-Air Business Objects to extract identifiers for ICIS-Air compliance monitoring, enforcement action and case file records that were entered into ICIS-Air after their AFS data was migrated and before they start their EDT submissions to add to the mappings.
4. Agency starts using EDT by utilizing the mappings of AFS migrated data and data that was entered into ICIS-Air before they started providing EDT submissions to provide the appropriate ICIS-Air identifiers for maintaining this data in ICIS-Air.

Solution #3

Agency only creates mappings for ICIS-Air activities that are linked to Federal activities and uses it to restore linkages.

1. Agency extracts migrated and pre-EDT data from ICIS-Air that are linked to one or more Federal activity.
2. Agency uses identifying information plus pollutant code, action type and date achieved to compare against the data in their agency system and create mappings.
3. Agency allows plug-in to create delete transactions for migrated and pre-EDT activities in ICISAir.
4. Agency reloads activities with their own Identifiers into ICIS-Air.
5. Agency uses the mapping to re-link their activities to the appropriate Federal activity/activities.

Question #13: I need the ICIS-Air identifiers that were migrated from AFS or entered into the ICIS-Air web application to be changed to match the identifiers in my State, Tribal or Local Agency's air system. How do I do this?

Answer:

For the AFS data migrated into our ICIS-Air production system, you may want some or all of your padded zeroes removed from your ICIS-Air Facility identifiers. If you tell ICIS Customer Support how many zeroes to strip out and where they are located in the string, we can do a "data fix" to strip them out for you, but you will need to provide ICIS Customer Support with a spreadsheet of your ICIS-Air IDs to be changed so we do not accidentally strip zeroes off your EPA Region's air facility IDs because they also start with "SC000".

Example #1 - Facility Identifier

- ICIS-Air Facility ID that was migrated = **SC0000004500512300**
- You tell ICIS Customer Support to remove 3 zeroes at the beginning of your IDs

- We cannot remove the first 5 because they are used by ICIS-Air for checking your WAM ID roles to see if you can change data for “SC” and LCON “000”, so I ask our contractor to remove 3 zeroes starting at position 6
- Newly revised ICIS-Air Facility ID = **SC0004500512300**

Example #2 - Facility Identifier

- ICIS-Air Facility ID that was migrated = **SC0000004500512300**
- You tell ICIS Customer Support to remove 1 zero at the beginning of your IDs and two zeroes at the end of your IDs
- We cannot remove the first 5 because they are used by ICIS-Air for checking your WAM ID roles to see if you can change data for “SC” and LCON “000”, so I ask our contractor to remove the zero at position 6 and the two zeroes at the end
- Newly revised ICIS-Air Facility ID = **SC0000045005123**

For the AFS data migrated into our ICIS-Air production system, you may want some or all of your padded zeroes removed from your ICIS-Air activity identifiers. If you tell ICIS Customer Support how many zeroes to strip out and where they are located in the string, we can do a “data fix” to strip them out for you, but you will need to provide ICIS Customer Support with a spreadsheet of your ICIS-Air Compliance Monitoring, Enforcement Action and/or Case File IDs to be changed so we do not accidentally strip zeroes off your EPA Region’s air facility IDs because they also start with “SC000”.

Example #1 - Compliance Monitoring Identifier

- ICIS-Air Compliance Monitoring ID that was migrated = **SC000A0000450120046512300**
- You tell ICIS Customer Support to remove 4 zeroes at the beginning of your IDs
- We cannot remove the first 6 because they are used by ICIS-Air for checking your WAM ID roles to see if you can change data for “SC” and LCON “000” and “A” for delegated agency, so I ask our contractor to remove 4 zeroes starting at position 7
- Newly revised ICIS-Air Facility ID = **SC000A450120046512300**

Example #2 – Case File Identifier

- ICIS-Air Case File ID that was migrated = **SC000A0000450120046512300**
- You tell ICIS Customer Support to remove 4 zeroes at the beginning and the 3 zeroes at the end of your IDs
- We cannot remove the first 6 because they are used by ICIS-Air for checking your WAM ID roles to see if you can change data for “SC” and LCON “000” and “A” for delegated agency, so I ask our contractor to remove 4 zeroes starting at position 7 and to remove the last 2 zeroes
- Newly revised ICIS-Air Facility ID = **SC000A4501200465123**

IMPORTANT NOTE: The above instructions work only for removing the same padded zeroes from all identifiers (e.g., remove the 4 padded zeroes starting at position 7, or remove 2 padded zeroes from the end).

To change digits and/or remove zeroes from varying locations within an identifier, you will need to give ICIS Customer Support a spreadsheet (one for air facility ids and one for activity ids) that lists your ICIS-Air web generated IDs in the first column and the IDs you want them changed to in the second column, like this:

ICIS-AIR FACILITY ID

SOUTH CAROLINA DESIRED ID

SC0000004500512300	SC00020120046512
SC0000004500512301	SC00012450051230

<u>ICIS-AIR ACTIVITY ID</u>	<u>SOUTH CAROLINA DESIRED ID</u>
SC000A0000004500512400000	SC000A45012004651230
SC000A0411500512300678901	SC000A124500512300

ICIS-Air Web Data Entry Activity Identifier Changes

If you enter data into ICIS-Air after October 27th by using the web data entry screens, you can enter your Air Facility IDs as you need them, but ICIS-Air will auto-assign your activity identifiers (Compliance Monitoring, Enforcement Action and Case File) in a format that does not pad with zeroes but starts with “1”, then increments by 1 (SC000A1, SC000A2, SC000A3, etc.).

To change these identifiers for EDT, you will need to give ICIS Customer Support a spreadsheet that lists your ICIS-Air web generated Activity IDs in the first column and the IDs you want them changed to in the second column, like this:

<u>ICIS-AIR WEB ACTIVITY ID</u>	<u>SOUTH CAROLINA DESIRED ID</u>
SC000A1	SC000A45012004651230
SC000A2	SC000A4512176
SC000A3	SC000A450026677

AFS HPV and FRV Questions

Question #14: I manually enter and link my HPVs and/or FRVs in AFS but am wondering if I should use EDT in ICIS-Air to do this. How does ICIS-Air EDT handle this?

Answer: ICIS-Air stores what used to be HPV and FRV related AFS Actions into two different ICIS-Air EDT data families: Case File and Case File Linkage. The Case File EDT XML submission is designed to allow you to add, change or delete one case file record containing pathway, advisement, and sensitive comment data along with one or more air violations including HPVs and FRVs. The Case File Linkage EDT XML submission is designed to simply link/unlink one existing Case File record with/from one other existing Case File record, or one other existing Formal Enforcement Action Record, or one other Informal Enforcement Action Record, or one other Compliance Monitoring record in ICIS-Air.

You would want to use the Case File Linkage XML if opting to do your HPV and FRV linking with EDT, or you could use EDT to submit your Case File and its associated Compliance Monitoring, TV ACC, Formal Enforcement Action or Informal Enforcement Action record(s) then use the ICIS-Air web application to manually link the case file to the record(s).

If you are decide to provide other pathway activities that are not related to Compliance Monitoring, TV ACC, Formal Enforcement Action or Informal Enforcement Action record(s) (e.g., Non-Enforcement Resolutions), that

data would be provided in the “OtherPathwayActivityData” parent tag within the Case File submission. The “OtherPathwayCategoryCode,” “OtherPathwayTypeCode,” and “OtherPathwayDate” tags are used to report the Discovery Action, Addressing Action, and/or Resolving Action when they are reported on the Case File directly and not as linked activities.

For example, if a violation was disclosed by a facility during an enforcement conference there is no compliance monitoring (FCE, PCE, stack test or TV ACC (receipt or review)) to report but the discovery action is still required if the violation is determined to be an HPV. So, you use a list of “other” options that are reported directly on the Case File. The “other” types of discovery actions include:

GNV	Corporate-Wide Negotiation
SFD	Self-Disclosure
CCT	Citizen Complaint
CNF	Conference with Facility
EAM	Enforcement Action Monitoring
ALC	Accepted Lead Change

Each tag you identified will be used to report the pathway milestone. For example to report a Self-Disclosure as the Discovery Action, the Pathway Category Code is **DSCV**, the Pathway Type Code is **SFD** and the PathwayDate is the date associated with the disclosure. The list of codes corresponding to the list of other addressing actions and resolving actions are found in the reference table called REF_PATHWAY_TYPE. The Pathway Category code for an “other” type of addressing action is **ADDR**. The Pathway Category code for an “other” type of resolving action is **RSLV**.

Question #15: The MDRs requires air programs on both the Air Facility and activity records including violations. In addition, the MDRs require at least one pollutant on an Air Facility and in some instances on a violation record. Some of my Air Facility records do not have an air program and never will. How can I get around this using ICIS-Air EDT?

Answer: For the Air Facility programs and pollutants, to get around this use **CAAFENF** for “AirProgramCode”, a description for “OtherProgramDescriptionText” and **FACIL** or **ADMIN** for the “AirPollutantCode”.

These same values can be used for activity reporting as well. For example, you can submit all future Case Files, where a pollutant is required on violations to be reported, for this facility using the Case File XML submission with “ProgramCode” containing **CAAFENF** and “OtherProgramDescriptionText” containing a state or local regulatory citation, and “AirPollutantCode” containing **FACIL** or **ADMIN**.

Case File violations also require a program in “AirViolationProgramCode” and some violations require a pollutant in “AirViolationPollutantCode”. The system does not enforce a relationship between the programs and pollutants on the facility and the program and pollutants on the activity or violation records. The user can enter either one of the programs or pollutants listed above in these tags.

Air Facility records are not systematically required to have Air Programs (i.e., ICIS will not force entry of Air Programs for an Air Facility), although they are programmatically required (MDRs). There are three new programs added to assist Delegated Agencies in providing the Air Programs:

PROGRAM_CODE	PROGRAM_DESC
CAAFESOP	Federally Enforceable State Operating Permit - Non Title V (FESOP)
CAANFRP	Non-Federally Enforceable Program
CAAFENF	Federally-Enforceable Requirement

If **CAAFENF** is submitted for the Facility, “OtherProgramDescriptionText” will be required as well.

Case File violations also require a program in <AirViolationProgramCode>. The system does not enforce a relationship between the programs on the Facility <AirProgramCode> and the program on the Violation <AirViolationProgramCode>, so the user can enter either one of the programs listed above on the Air Violation or a specific program if one is applicable. If CAAFENF is entered for <AirViolationProgramCode>, <AirViolationProgramDescriptionText> will also be required.

Question #16: ICIS-Air will be requiring a subpart for the NESHAP, MACT and NSPS programs. Some of my Air Facility records do not have any air programs, or have one or more air programs but none of them have a subpart and never will. How can I get around this using ICIS-Air EDT?

Answer: The requirement is enforced on a program basis. The system will require a subpart in your Air Program XML submissions if **CAAMACT**, **CAANSPS**, or **CAANESH** are reported as the “AirProgramCode”. You can submit **CAANSPSM** or **CAAGACTM** as the “AirProgramCode” for the non-major facilities and a subpart will not be required.

The following are the Air Programs that require Sub Parts and their Minor equivalents:

Program Code	Program Description
CAAMACT	MACT Standards (40 CFR Part 63)
CAAGACTM	40 CFR Part 63 Area Sources
CAANSPS	New Source Performance Standards
CAANSPSM	New Source Performance Standards (NonMajor)