R&D PROJECT PLAN
09_CBI PROCEDURES STUDY

February 1, 2018

OVERVIEW

1. Participants

Participant Name (* = team leads)	Participant Organization	Participant Phone #	Participant email
Michael Burton*	Arizona DEQ	602-771-4562	burton.michael@azdeq.gov
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2. Project Description

Study of state, local and tribal (SLT) and EPA program business cases and practices for handling confidential business information (CBI) as it relates to emission reporting information and identification of issues and recommendations for handling CBI within the proposed common emissions form (CEF) approach under CAER.

3. Project Steps

A. A workgroup will study the phase 1 data model survey results in detail and follow-up with particular SLTs to define the practices and business cases for handling CBI.

B. For each SLT that handles CBI information in their emission inventory reports, collect the following information:

1. Language of rule/regulation that defines what constitutes confidential information
2. List of data items that can be classified as confidential
3. Are certain data items always considered confidential or do facilities need to specifically claim confidentiality?
4. SLT procedure for handling confidential data

   - Do they store confidential data separately? Or do they label/tag it as confidential?
   - When a public request is made for emissions data, how do they handle removing/redacting the confidential items?

C. Prepare summary report of collected information. This report should also include possible options and suggestions for procedures on how a common form approach could handle confidential information.

4. Prior Work

A. Federal Clean Air Act regulatory language pertaining to CBI (40 CFR 2.301)
B. Phase 1 Date Model Team survey results related to CBI questions.

C. Research and summary of CBI procedures prepared by Ross from Phase 1 Data Model team survey results and sample states.

5. Deliverables

A. A summary report of collected information.
B. Recommendations for draft procedures and options for how a common form could handle confidential information.

6. Resource Needs

The team anticipates the need for contractor support in collecting and pulling pertinent CBI information from program systems. This information will come from both SLT systems and EPA programs. Also, contractor support for final product development is anticipated to get to a product deliverable that can be distributed and oriented to multiple audiences and outreach options. Team will need to assess the specific support needed based on information already collected and summarized by Ross prior to the kick-off of the project team. This will likely be less than initially anticipated due to this pre-existing work.

7. Expected Workload

Team members should expect to participate in bi-weekly meetings, lasting 1 to 2hrs in length for a period roughly 4 to 6 months, depending on the length of the project. At the start of the project, team members will be expected to collect relevant CBI handling information from their programs to contribute to the compilation effort, if not all already represented in the compiled data or not adequately represented. Team members should be expected to spend time, beyond the meeting times, at key points in the first two months to review draft compilations of CBI procedures and provide input to multiple iterations of the draft compilation. Lastly, in preparation of final products, team members will be expected to provide input to the final product development and in supporting and participating in outreach opportunities (presenting results to PDT, CAER audiences, etc.).

Based on this expected workload, team members can expect to spend, on average, roughly 4 hours per week on the project. Some members may experience higher workload during the compilation steps, where data is being centrally pulled together.

DELIVERABLES & EXPECTED COMPLETION DATES

Below is a list of key deliverables and expected completion dates. Dates are estimates and may be affected by the extent and availability of resources. Also, note that the project team plans to update the PDT near the completion dates for major project steps shown below and the project team lead will contact the PDT co-chairs in advance of those dates to set an appropriate report out time and date with the PDT.

Deliverable	Expected Completion Date
A. Draft compilation of R&D team's starting point CBI procedures	January 29, 2018
B. Complete final workplan for team	February 1, 2018

C. Review and edits to draft summary report from background research of CBI procedures	February 8, 2018
D. Additional CBI procedures added to initial compilation through further team research and study	March 30, 2018
E. Final draft of compilation/summary of CBI procedures	April 13, 2018
F. Prepare draft recommendations for options for CBI procedures with a common form approach under CAER	May 25, 2018
G. Final draft summary report of all collected information and final recommendations for CBI handling procedures in common form and suggestions for next steps to integrate with common form development	June 15, 2018