



New Electronic Reporting Requirements for Combustion Turbines

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Before we dive in, a few quick housekeeping notes.



How can I ask questions?

Enter your questions in the Questions box at any time. We'll hold a live Q&A at the end.



Will I get a certificate of completion?

Yes. All attendees are automatically sent a certificate of completion later this afternoon.



Will I get a copy of the slides?

Yes. We'll post a recording and the slides on our website and email a link to all registrants tomorrow.

What Changed

On January 9, 2026, EPA finalized a new performance standard for combustion turbines and revised the existing turbine standards in the same rule.

1

New Subpart KKKKa

Applies to combustion turbines (CTs) that were constructed, modified, or reconstructed after December 13, 2024. It sets updated NOx limits and new source categories.

2

Revised GG and KKKK

The existing stationary gas turbine (GG) and combustion turbine (KKKK) standards were amended in the same action, so they align with the new requirements.

3

New electronic reporting

The change that matters most for compliance teams: test results, RATAs, and compliance reports now go to EPA electronically instead of on paper.

Important: Non-EGU turbines subject to above rules are also affected.

Source: EPA final rule (January 2026); 40 CFR Part 60 Subparts GG, KKKK, and KKKKa.

What is Now Required

Turbines subject to NSPS Subpart GG, KKKK, or KKKKa must now submit the following electronically through EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI):

Tests completed on or after March 16, 2026

1

Performance test reports

Initial and periodic (annual) NO_x performance test results.

2

RATAs

Relative Accuracy Test Audits for continuous emissions monitoring systems (CEMS).

3

Compliance reports

Semiannual and other periodic compliance reports.

Performance test and RATA results are prepared in EPA's Electronic Reporting Tool (ERT).

Compliance reports use the CEDRI templates. If a test method is not supported by the ERT, results are attached as a PDF within the ERT.



Compliance Reports

§ 60.4395 When must I submit my reports?

All reports required under § 60.7(c) must be electronically submitted via CEDRI by the 30th day following the end of each 6-month period.

§ 60.4375 What reports must I submit?

40 CFR 60.4375(f) You must submit to the Administrator semiannual reports of the following recorded information. Beginning on January 15, 2027, or once the report template for this subpart has been available on the Compliance and Emissions Data Reporting Interface (CEDRI) website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>) for one year, whichever date is later.



One RATA, Three Submittals

The same Relative Accuracy Test Audit (RATA) data can now be required in three separate systems, each with its own format, portal, and deadline.

PART 75

ECMPS 2.0

Acid Rain and CSAPR data, reported through EPA's ECMPS client tool.

NSPS §60.13

ERT to CEDRI

The new requirement under NSPS

STATE AGENCY

A separate copy

Many state air programs still require their own submittal of the report.

Same data. Three formats. Three deadlines. A mismatch between them is exactly the kind of discrepancy an agency notices.

Three Submittals, Three Sets of Rules

	PART 75	PART 60 NSPS	STATE
Platform	ECMPS 2.0	ERT / CEDRI	Various
File type	JSON	ERT (.acddb) or XML	PDF, EDR, etc.
Parameter	NOx-Diluent	NOx-Diluent	NOx, CO, NH3, etc.
Units	lb/MMBtu	ppmc or lb/MMBtu (ppm and O2)	Applicable emission limits
Data source	DAHS	Manual transcription	PDF report, manual

Same RATA, three translations. ALL4 builds the ERT submittal and reconciles it against the source report.

Why This Matters Now

1 EPA's purpose for the ERT

Built so agencies can review test plans and results, comment on them, and develop user-defined emission factors.

2 States are adopting it

EPA intends for states to use the ERT to receive electronic reports, widening the audience for every file.

3 Every test is a submittal

Each test and RATA is now a structured electronic file on a deadline tied to the test and fixed reporting cycles, not your bandwidth.

4 Part of the public record

Once submitted through CEDRI, reports become part of a public, searchable federal record in EPA's WebFIRE database.

5 Higher stakes for errors

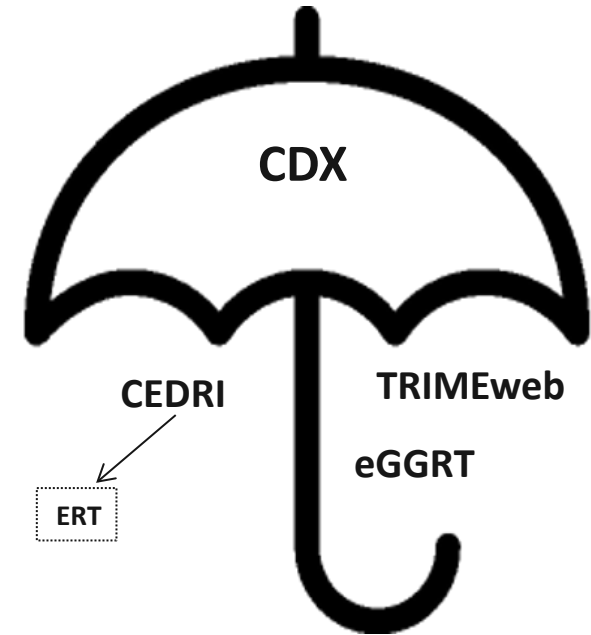
A larger audience means a flawed or late submittal carries more risk; corrections consume senior hours and invite closer agency review.

6 Errors are easy - and public

Hundreds of hand-entered values and late ERT validation failures drive errors - and on a public record, a correction does not stay between you and your agency.

What is ERT?

- ❑ E-Reporting using U.S. EPA's Compliance and Emissions Data Reporting Interface (**CEDRI**)
- ❑ Evolution
 - 2006 - 2011 - Voluntary Adoption - Limited Capability
 - 2012 - 2016 - Mandatory for new/updated NESHAPS/NSPS
 - 2016 - Present – Comprehensive, update WebFIRE and rule-making
- ❑ Current: Version 7.0, revised a few times
- ❑ CEDRI is located on U.S. EPA's Central Data Exchange (**CDX**)
- ❑ Some reports must be compiled using the Electronic Reporting Tool (**ERT**) before being uploaded to CEDRI
 - *Two separate entities*
 - *Stack test results are first compiled via ERT and then uploaded to CEDRI*



Using ERT - Installation

- ❑ Access the U.S. EPA ERT landing page here: <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>
- ❑ Install the latest version of ERT on your computer desktop
 - Version 7: Released 3/12/2024, last updated 9/2/2025
 - Must enable macros
- ❑ This webpage serves as a source of other useful downloads, for example:
 - Point data spreadsheet templates
 - U.S. EPA ERT User Guide



Installation, Program Files and User's Guide

ERT version 7.0 Released March 12, 2024; Updated 6/23/25

[ERT Version 7 Program Files - June 23, 2025 \(10 MB\)](#). **NOTE: ERT Application and data file must be located on a local computer and not the network or thumb drive to work consistently.** Because there are issues with executable file download, a zip file is located by the link. This version of the program requires either MS Access 2010, MS Access 2013, MS Access 2016, MSAccess 2019, MSAccess 365 or MS Access Runtime. Download the zip file to your hard drive, open and unzip the file will give access to the manual and the database to a folder that you select. **If you do not have MS Access 2010, 2013 or 2016, 2019 or 365 download and install the version of MS Access Runtime for the version of Office that you have installed on your computer. MS Access 365 Runtime will work with Office 365 and Office 2019.** Running the ERT application (ERT7.accdb) will open the program with MS Access.

CEDRI - Overview

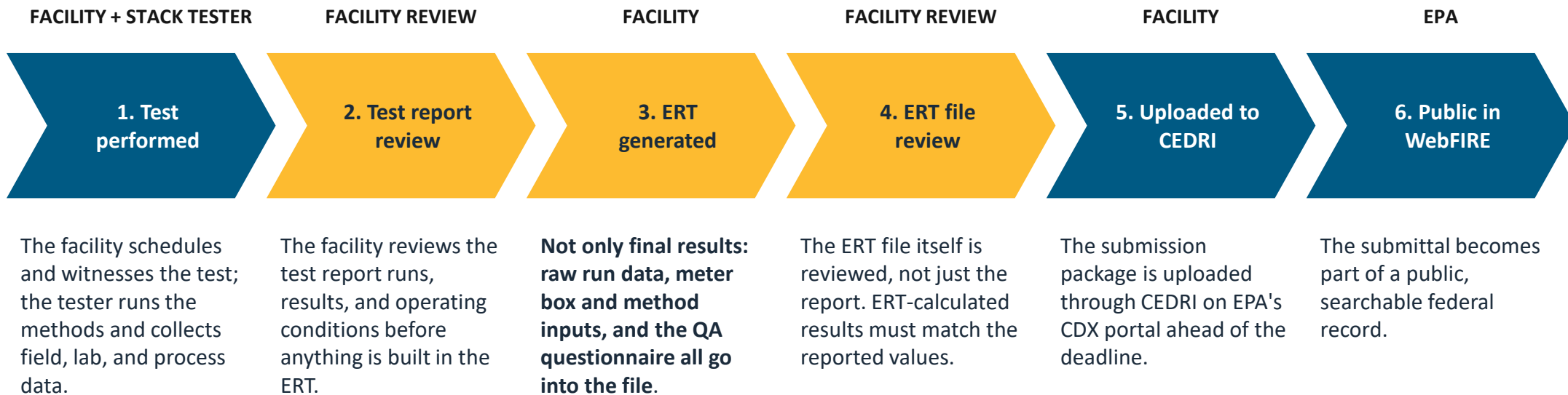
- Performance Test/RATA Reports
 - Upload and submit “.zip” file compiled in ERT
- Register with CDX/login.gov
 - <https://cdx.epa.gov/>
 - May have an existing CDX account for EASEY, GHG reporting or TRI
 - Add CEDRI as a program if not already included by clicking “Add Program Service” on home page
 - Select Role (Certifier/Preparer)

The top screenshot shows the EPA CDX Central Data Exchange interface. It features a navigation bar with links: Home, About, Recent Announcements, Terms and Conditions, and FAQ. Below this is a sub-navigation bar with: MyCDX, Inbox, My Profile, Submission History, and Payment History. The main content area is titled 'Services' and contains a table with columns: Status, Program Service Name, and Role. The table lists three services: CEDRI: Compliance and Emissions Data Reporting Interface (Role: Preparer), e-GGRT: Electronic Greenhouse Gas Reporting Tool, and TRIMEweb: Toxics Release Inventory Made Easy Web (Role: TRI-MEweb (Preparer)). Below the table are two buttons: 'Add Program Service' and 'Manage Your Program Services'. The bottom screenshot shows the EPA CEDRI (Compliance and Emissions Data Reporting Interface) home page. It has a navigation bar with: MyCEDRI, My Reports, and CEDRI History. Below this is a section titled 'What would you like to do?' with four buttons: 'Create a Report' (Create a new report.), 'Complete Reports Under Development' (View and edit reports in progress.), 'View Submitted Reports' (View, Revise, or Withdraw previously submitted reports.), and 'Manage Facilities' (Add, edit, or delete your facilities.).

Status	Program Service Name	Role
	CEDRI: Compliance and Emissions Data Reporting Interface	Preparer
	e-GGRT: Electronic Greenhouse Gas Reporting Tool	
	TRIMEweb: Toxics Release Inventory Made Easy Web	TRI-MEweb (Preparer)

What would you like to do?
Create a Report Create a new report.
Complete Reports Under Development View and edit reports in progress.
View Submitted Reports View, Revise, or Withdraw previously submitted reports.
Manage Facilities Add, edit, or delete your facilities.

How an ERT Submittal Gets Made



What We Find in ERT Files

01

Significant

- Invalid or zero-valued runs left in the average, understating the reported compliance value.
- Process and operating data carried over from a different test - day, fuel, or load.
- Spurious extra results from data entered as runs that were never runs.

02

Report is right but ERT is wrong

- Right values in the wrong field or basis - the tool converts twice and the output is off by tens of percent.
- Calibration and analyzer settings that don't match the report
- Run and parent-child links, pairing results with the wrong flow, moisture, and diluent.

03

Wrong message

- Supporting documentation not attached though the checkboxes claim it is; QA questionnaire unanswered.
- Limits stated with no computed result against them - the submission demonstrates nothing.
- Prior projects surviving in the file - other clients' names and paths, another unit's data, placeholders.

None of these are visible in a quick look at the file. Requires deep expertise or hours going through each data point.

Why the ERT Is Hard to Get Right

01

A legacy desktop tool

The ERT is a Microsoft Access database that runs locally. Install issues, security warnings, and freezes while building the submission package are routine.

02

Hundreds of fields, entered by hand

Data is hand-entered or imported field by field. One value in the wrong place is silently carried through every calculation.

03

It calculates for you

The ERT converts, corrects, and computes results. Wrong settings produce a wrong answer that still looks complete.

04

A moving target

Version 7 brought all test methods into the tool, and EPA continues to update the software, schema, and guidance.

05

Submission is a second system

Files go to EPA through CDX and CEDRI, with its own registration, roles, certification, and error messages to work through.

ALL4 ERT Process

1

Review test report

Field sheets, lab data, CEMS exports, and the test report are reconciled.

Expert: applicability confirmed and source-report inconsistencies flagged before any entry.

2

Build and transcribe

Hundreds of values in the ERT, with runs, methods, and units checked for representativeness.

Expert: ambiguous runs resolved on judgment, not copied across.

3

Completeness checks

Structured internal checklist catch gaps before submission.

Expert: each flag interpreted, file reconciled with test report.

4

Senior expert review

The file is reviewed end to end, findings documented, and delivered submission-ready.

Expert: a senior reviewer signs off and carries findings forward.

ALL4 Expert Team

Hundreds

of ERT packages prepared

Thousands of hours

of hands-on ERT practice

Plugged into EPA

in regular contact with EPA's ERT team
- current on tool updates, bugs, and
workarounds

Every stage

engaged from test report review
through senior sign-off

A New Dedicated ERT Capability

ALL4 is rolling out a dedicated ERT reporting capability built to produce accurate, validation-ready submittals at scale, so your GG, KKKK, and KKKKa reporting stays on time and holds up to scrutiny.

1

Accuracy first

A senior ERT expert stands behind every file before it reaches you.

2

Faster, predictable turnaround

Submission-ready ERT files on a committed schedule. The reporting clock becomes a planning input, not a threat.

3

Consistency at any volume

One turbine or a multi-facility fleet, every file comes out of the same process at the same standard.

Same Process, More Efficient

TRADITIONAL PROCESS WITH EXPERT REVIEW

6 to 12 hours

per file, depending on the preparer's experience,
assembled manually.

ALL4 ERT CAPABILITY

About 50% faster

with same expert review at a lower cost.

How we get there

Domain expertise

Thousands of hours of ERT practice



Dedicated ERT team

One team, one method, every file



Technology

Eliminate manual work

Same standards. We eliminate the time-consuming manual work - transcription, formatting, and rework, while every file still gets the same depth of expert review and senior sign-off.

Human – AI Systems Approach

Human leads, AI enhances

Governance + guardrails at every stage

Scope & define

HUMAN

Sets direction, constraints

AI

Research, brainstorm, explore

Plan & gather

HUMAN

Prioritizes, spots gaps

AI

Structure, find precedent

Build & draft

HUMAN

Steers approach, adds context

AI

First drafts, data analysis

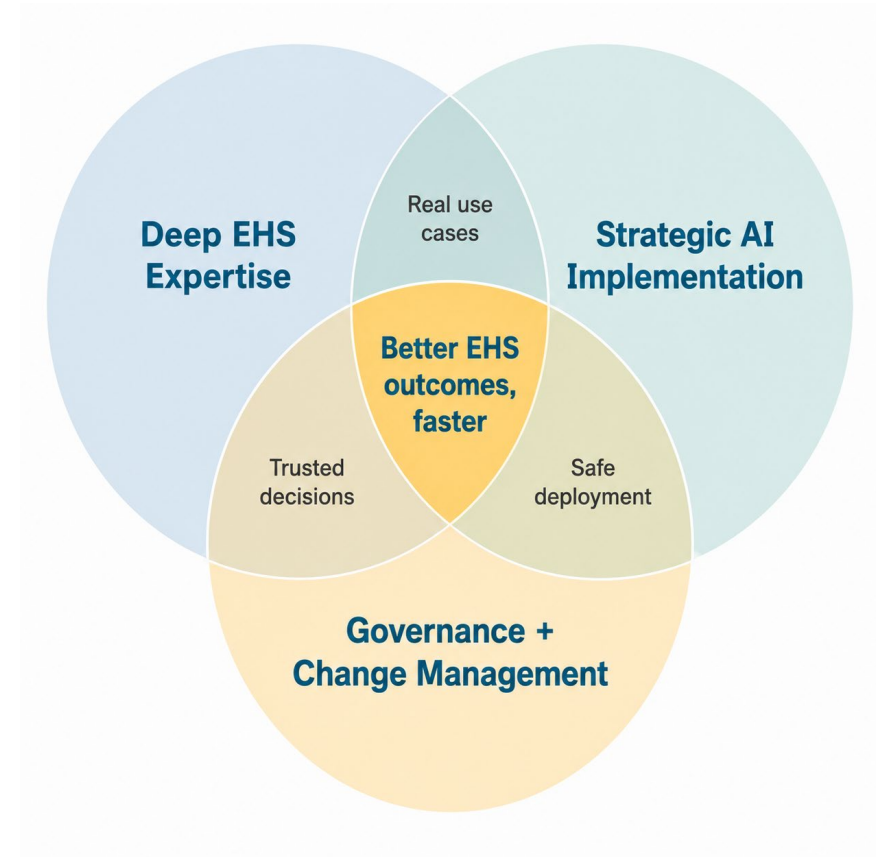
Review & finalize

HUMAN

Verifies, owns quality

AI

QA checks, flag gaps





Considerations

1 Know what was submitted

Do you know what information has already been submitted via ERT for your facility - and whether it is correct?

2 Review your ERT files

Do you review the ERT file itself, not just the test report, before it is certified and submitted?

3 Build in review time

Have you engaged your ERT developer to deliver files and reports with ample time for a complete review?

4 Agree on your approach

Have you discussed your philosophy for reporting and classifying data, and standard language explaining the purpose and use of the data?



How Can ALL4 Help?

01

End-to-End ERT Development and Review

We build or rebuild the file, validate it against the test report, and hand it back submission-ready with a senior expert sign-off.

Fastest path

one team owns it end to end

Lowest risk

errors caught before submission

No learning curve

no tool, no training, no rework

02

ERT Hands-On Training

- Site-specific
- Real ERT file preparation
- Post-training support may be included

03

As-Needed Support and Troubleshooting

- ERT rebuild
- Review ERT against test report
- CEDRI/ERT login and submission

Let's plan your ERT submittals!

Reach out to:
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610-422-1139



www.all4inc.com

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