ELECTRONIC PERMIT SYSTEM (EPS) & RACT/BACT/LAER CLEARINGHOUSE (RBLC) DATA ENTRY MODULE USER GUIDE



Last Update: 09/30/25



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1.0 Introduction to the Electronic Permit System (EPS)

The main purpose of EPS is to provide a centralized platform to collect, and store, documents and data from permitting authorities (PA) and permit applicants, to allow EPA to provide permit review oversight and issue EPA permits. An additional objective of EPS is to provide permitting information to the public in accordance with the Clean Air Act (CAA). A PA is any State, Local, Tribal (SLT) agency with an approved/delegated permitting program to issue CAA permits; there are also EPA-issued CAA permits, where EPA is the PA. Some of these permits, and associated documents, are submitted to meet regulatory requirements associated with permitting programs, and others are submitted voluntarily. For each submittal, when applicable, EPS does additional tracking of where the permit is in the review process for EPA's Title V permitting regulatory 45-day review and the petition period that follows.

If you are new to the EPS application, you can follow the steps listed in the following user guide to register for access to the system.

2.0 Navigating the Permitting Authority Landing Page

The Permitting Authority Landing page (PAL) Air Permits table houses submitted (i.e., statuses of "Submitted" and <u>"Resubmitted"</u>) permit actions within a user's permitting authority, as well as pending permit actions (i.e., statuses of "Pending" or <u>"Revision in Progress"</u>), currently being worked on by Permitting Authority users. The table also allows users to (1) sort, (2) search, and (3) export data to an Excel .xlsx file (Figure 1).

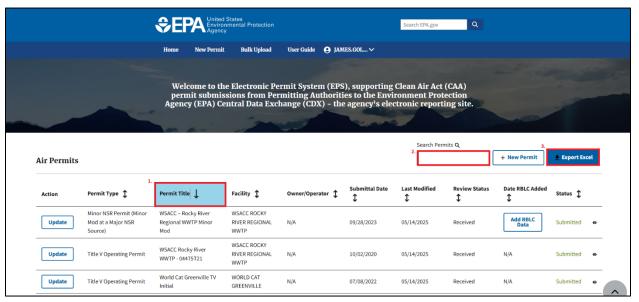


Figure 1

On the "Permits" table, you can click the "Permit Title" hyperlink for permit actions with a "Pending" or "Revision in Progress" status to be re-directed to the in-progress Permit Action form. There, you can finish data entry and submit your Permit Action form. You can click the eye icon for permit actions with



a "Submitted" or "Resubmitted" status to be redirected to the "Permit Review Page," which displays a summary of the Permit Action form in a read-only state (Figure 2).

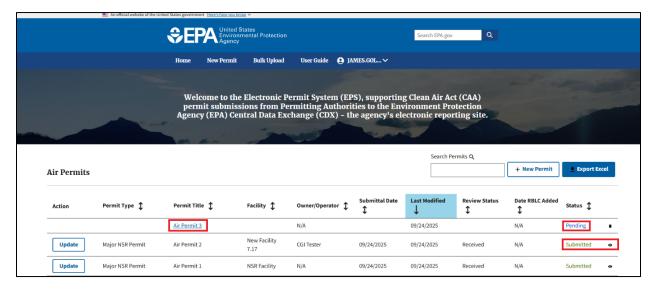


Figure 2

For permit actions with a "Pending" or "Revision in Progress" status, you can click the trash can icon (Figure 3), and click the "Continue" button in the confirmation modal, to delete in-progress permit actions (Figure 4). When a permit with "Revision in Progress" status is deleted, the table returns to the most recent submitted version of the Permit Package.

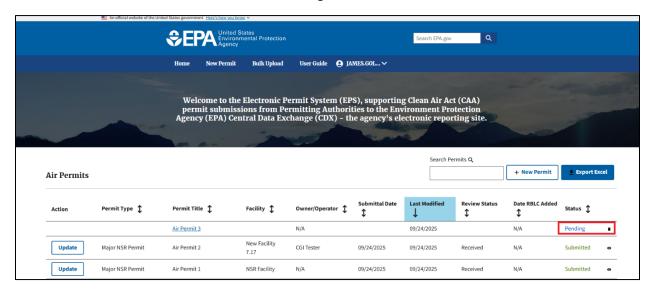


Figure 3



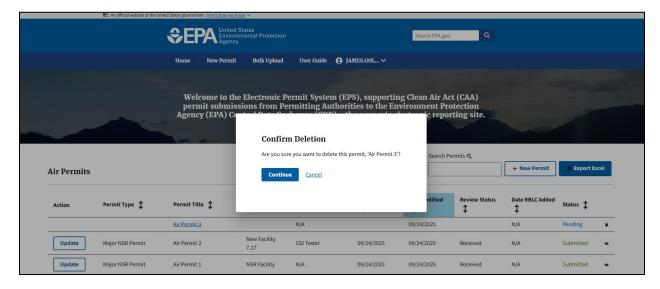


Figure 4

2.1 Features That are Not Yet Active

The "Bulk Upload" feature (Figure 5) is not operable. In the future, bulk upload will allow PA users to populate a spreadsheet with multiple facilities' permit action data. Users can then upload the spreadsheet, and relevant permit documentation, into the system.

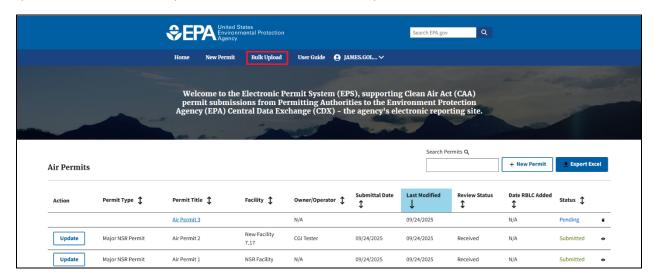


Figure 5

3.0 Creating a New Permit Action Form

Permitting Authority users wishing to create a new permit action can do so using this application. EPA users can create and submit permit actions. However, they create and submit those permit actions from a different EPS application that is solely for EPA users.



3.1 Starting a New Permit Action Form

Clicking the "+ New Permit" button on the top right corner of the "Permits" table or clicking the "New Permit" tool bar link redirects you to a new permit action form. From there, you can begin data entry (Figure 6).

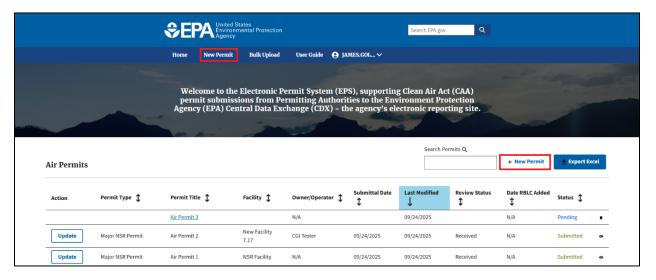


Figure 6

3.2 Permit Action Form Data Entry

Once you have initiated a new permit action form, you can add permit information to the following pages of the form (Figure 7):

- 1. Permit Title and Source
- 2. Source Information
- 3. Permit Action
- 4. Supporting Information



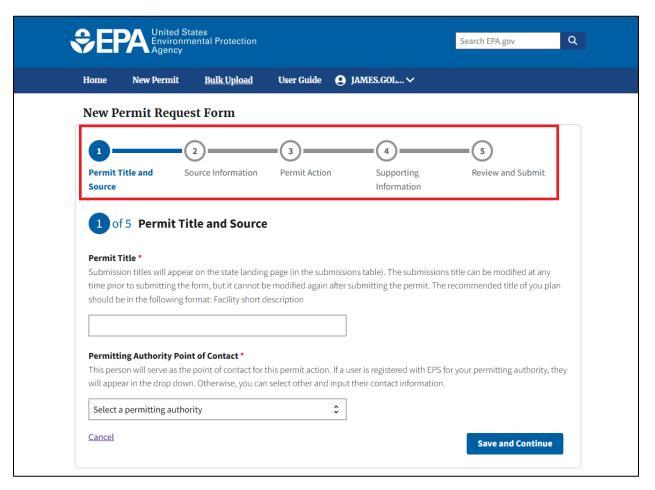


Figure 7

After you complete all required fields on page 1, click the "Save and Continue" button to navigate to the next page within the form (Figure 8). You cannot navigate throughout the form until page 1 is saved.



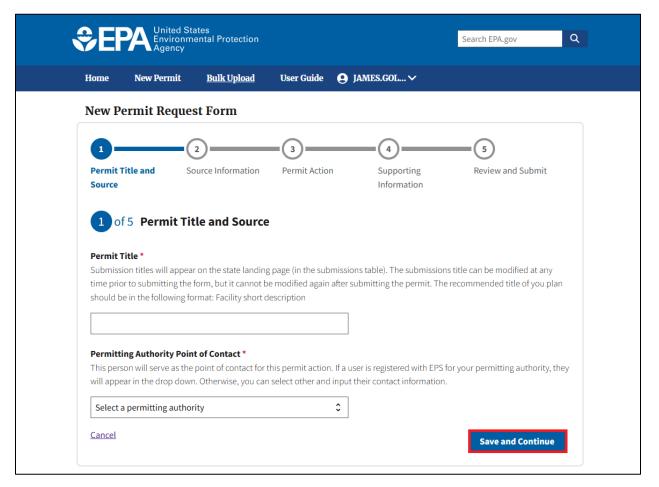


Figure 8

3.3 Linking Existing Facilities

After completing the fields on the first page, you will proceed to the "Source Information" page where you are able to link your permit action form to facilities that were previously used in the legacy EPS application (Figure 9).



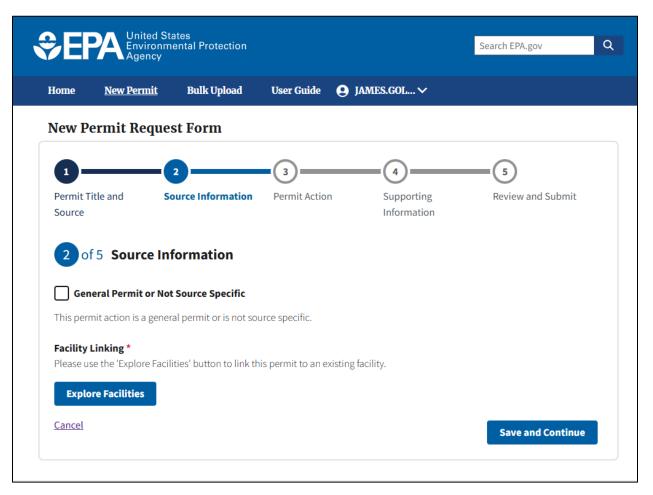


Figure 9

Click the "Explore Facilities" button (Figure 10) under the "Facility Linking" header to open the "Explore Facilities" pop-up modal. You can search for existing facilities via Zone Improvement Plan (ZIP) code. Additionally, if you are searching for an existing "Mobile" or "Offshore" facility, you can do so using the corresponding buttons (Figure 11).



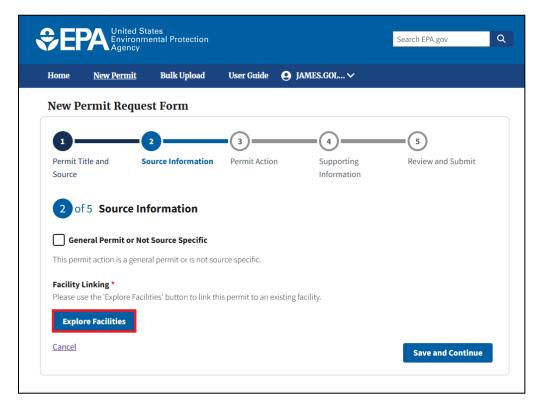


Figure 10

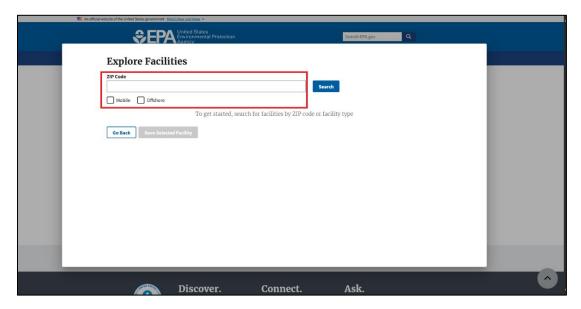


Figure 11

Once you enter the needed ZIP code or select one of the "Mobile" or "Offshore" options, click the "Search" button to return facilities based on your entered search parameters (Figure 12). You can select



the appropriate facility and then click the "Save Selected Facility" button to link the facility to your permit action form (Figure 13).

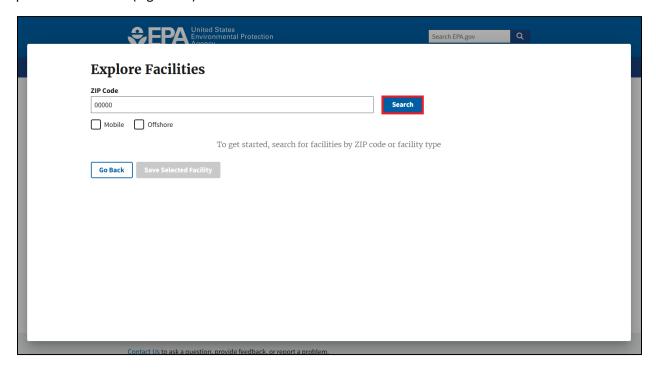


Figure 12

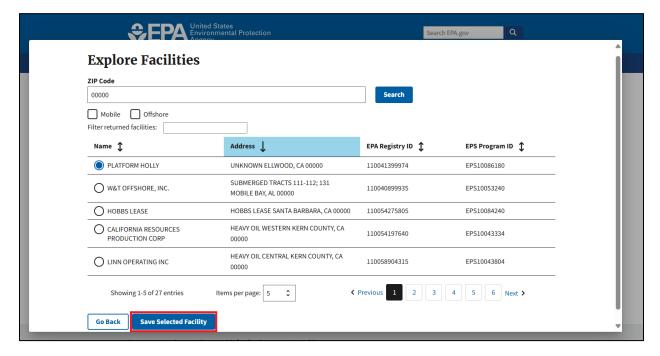


Figure 13



After clicking the "Save Selected Facility" button, you are taken back to the "Source Information" page where the selected facility's associated data is now prepopulated (Figure 14).

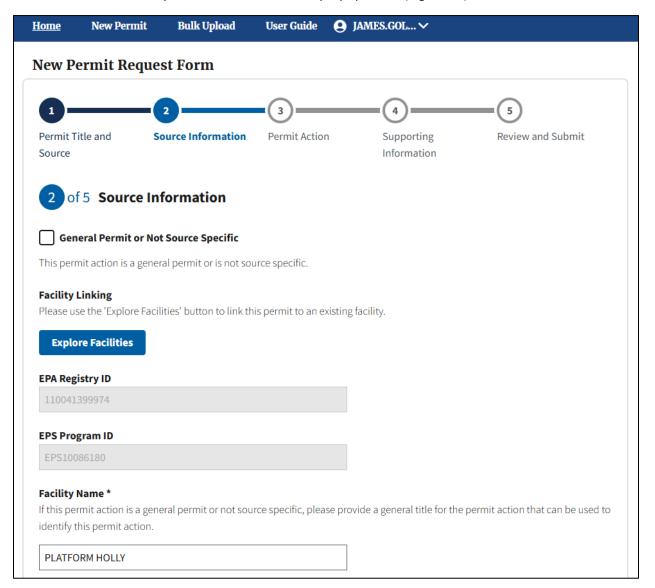


Figure 14

You can make any necessary changes to the associated facility data on this page. Once the permit is submitted, any updates to the facility are then applied to that facility's record and will show on future permit action forms that use the same facility. Permit action forms associated with that facility that were submitted prior to your updates will maintain the same facility data that was associated with the facility at the time of their submission.

If you cannot find your facility or need to create a new facility, click the "Search" button and then click "here" at the bottom of the screen, to complete manual data entry of the facility related fields on the



"Source Information" page of the permit form (Figure 15). Once submitted, any newly created facility is available to search via ZIP code for any future user that needs to submit on behalf of the facility.



Figure 15

3.4 Uploading Supporting Documentation

After completing all fields on the first three pages, you can proceed to the "Supporting Information" page where you can upload all supporting documentation related to the submission. These documents help EPA review the permit. A list of the types of supporting documents is provided on this page. You can either drag and drop one .ZIP file (including all documentation) or click the "Choose File" button to choose the .ZIP file from your local hard drive. You are required to assign a document category to the file that helps EPA better determine what each attachment is. You can also add a description to each file, if further details are needed (Figure 16).



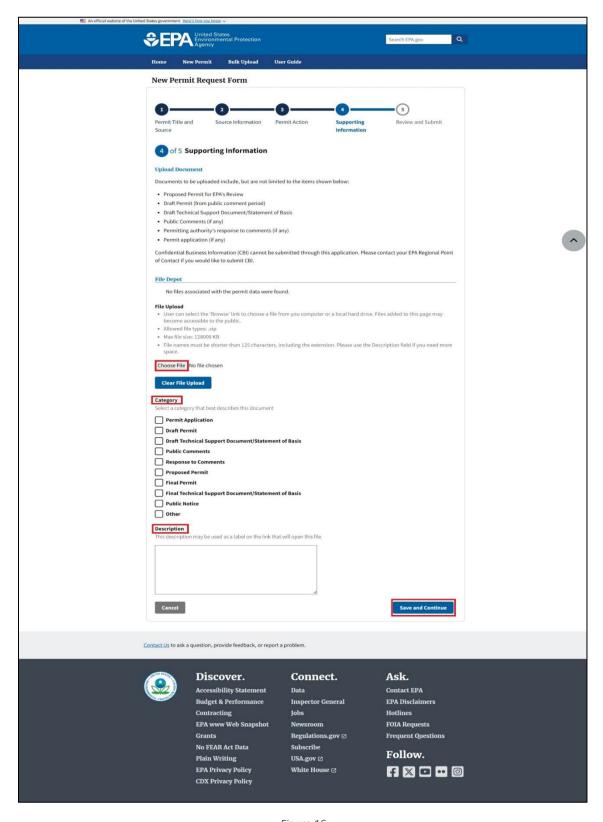


Figure 16



3.5 Submitting a Permit Action Form

Once all the required fields have been populated on the first four pages, proceed to page 5, "Review and Submit." You can review key permit information within the "Permit Details" section as well as all files associated to the submission within the "File Depot." If you see any data you would like to edit, you are able to click on the text in the progress tracker (at the top of the form) of the respective page, to navigate to that page and make the necessary edits. Click the "Save and Continue" button on any pages that received edits. Once you verify the data is accurate on page 5, click the "Submit Now" button on the bottom of the page (Figure 17) to submit. You will then receive the confirmation submission banner at the top of the page (Figure 18). When navigating back to the "Permits" table, the submission displays as "Submitted" in the "Status" column.

If the final permit that you have submitted is eligible for RBLC Data Entry, please navigate to the Navigating to the RBLC Data Entry Module section of the user guide.



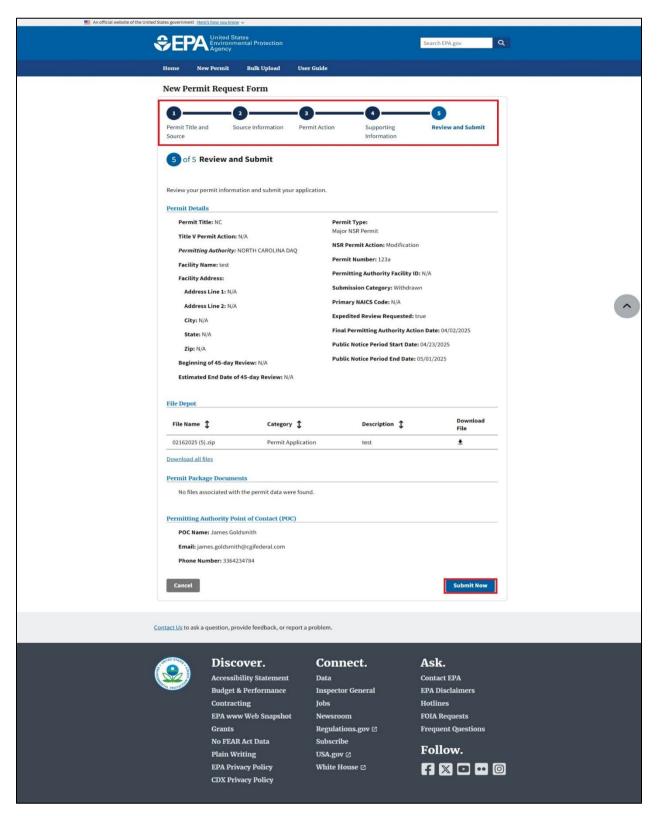


Figure 17



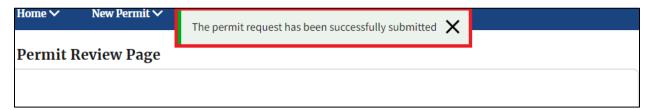


Figure 18

3.6 Resubmitting a Permit Action Form

If you need to resubmit a permit action (e.g., to update a permit action from proposed to final), click "Update" in the action column of the "Permits" table to begin the resubmission process for permits with a status of "Submitted" or "Resubmitted" (Figure 19), then click the "Continue" button on the confirmation modal (Figure 20).

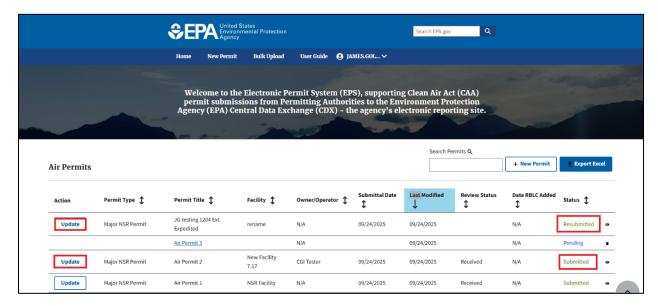


Figure 19



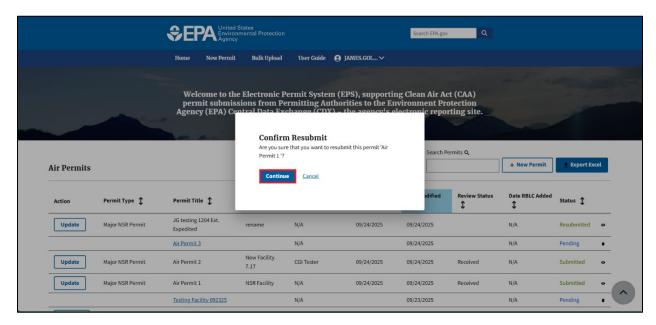


Figure 20

This reopens the previously submitted permit action form for editing (Figure 21). All data on pages 1-3 will be retained but you are still able to make edits. You can update any of the fields as needed (e.g., change 'Submission Category' to "Final" on page 3, if adding the final permit).



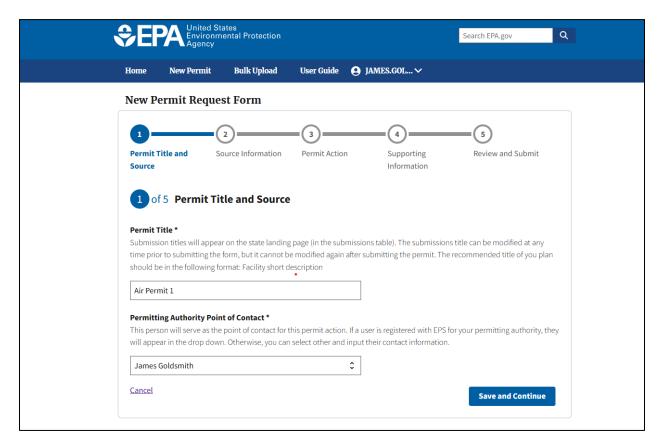


Figure 21

Documentation uploaded in the previous permit action will <u>not</u> be retained from the previous submission, although it is still linked to the previous submission. You may upload any new attachments (e.g., the final permit) on page 4 (Figure 22), following the steps provided in <u>section 3.4</u>.



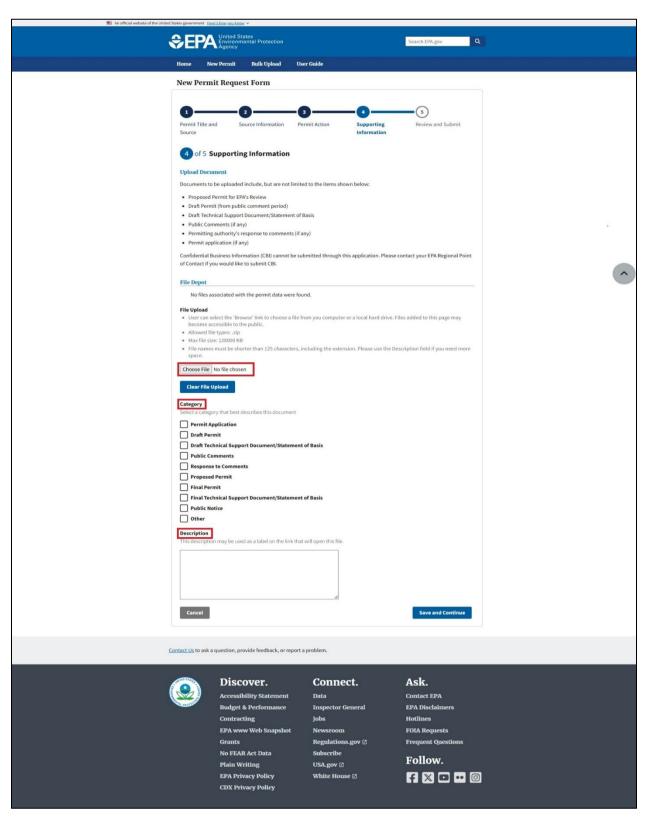


Figure 22



If at any point while editing the resubmitted permit you need to review the "Permit Review Page" of a previous submission, click the "Home" link on the top toolbar (Figure 23) to be redirected to the "Permits" table. The permit action displays a status of "Revision in Progress" on the "Air Permits" table. Clicking the "Review Previous" button in the "Action" column of the table (Figure 24) redirects you to the most recent submission's "Permit Review Page" in a new window.

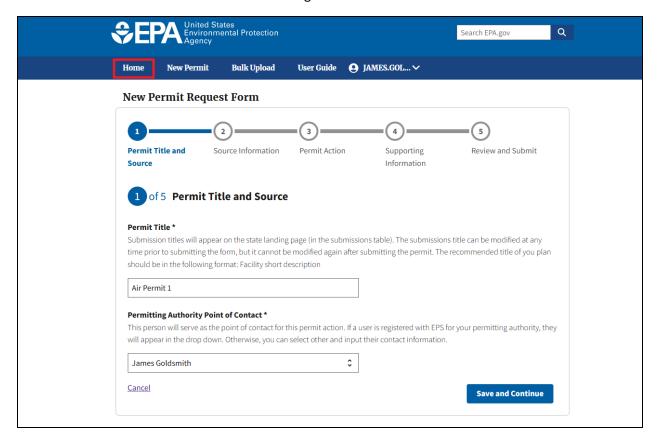


Figure 23



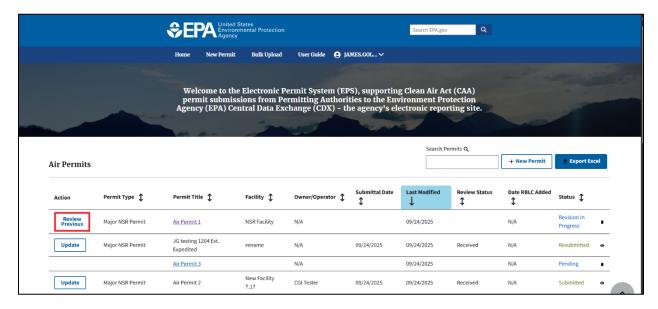


Figure 24

Once all the required fields have been populated on the first four pages, you can proceed to page 5, "Review and Submit." You can: (1) review key permit information within the "Permit Details" section (2) review all files associated to the current resubmission within the "File Depot" section, and (3) view all documentation associated to previous versions of the permit the user is updating, in the "Permit Package Documents" table. If you see any data you would like to edit, click the text on the progress tracker of the respective page to navigate to that page and make the necessary edits. Click the "Save and Continue" button on any pages that received edits. Once you verify your data is accurate on page 5, (4) click the "Submit Now" button on the bottom of the page (Figure 25). You will then receive the confirmation of submission banner at the top of the page. Once you have updated your permit action form and completed the resubmission process, both the resubmitted and original permit become part of a "Permit Package." You can update and re-submit a permit action multiple times, and there is no limit to the number of resubmissions for a given action. Every resubmission made during the permit's lifecycle are linked together as a part of the same "Permit Package".

When navigating back to the "Air Permits" table, the submission displays as "Resubmitted" in the "Status" column (Figure 26). Once a permit action form is resubmitted, only the most recent permit in the package is displayed on the "Air Permits" table.



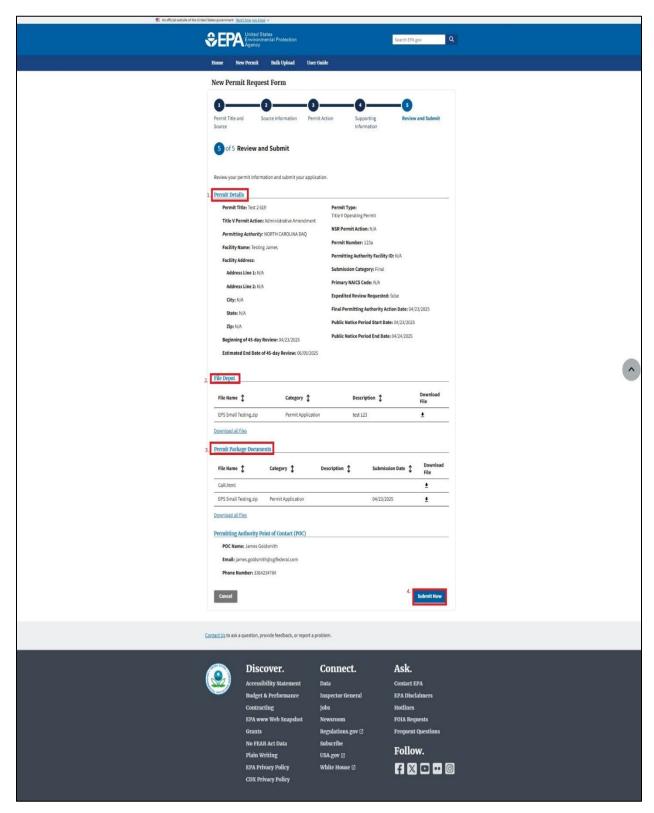


Figure 25



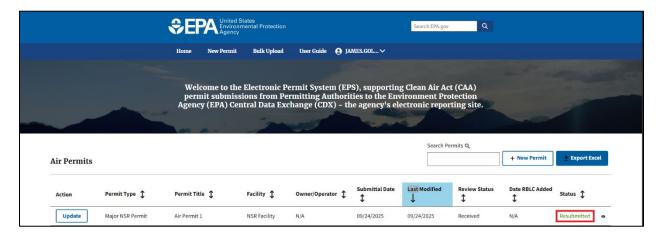


Figure 26

4.0 Accessing Permit Reviews

Click the eye icon (Figure 27) in the "Permits" table for a specific permit submission to navigate to that permit's "Permit Review Page." This option is only be available for permits with a status of "Submitted" or "Resubmitted."

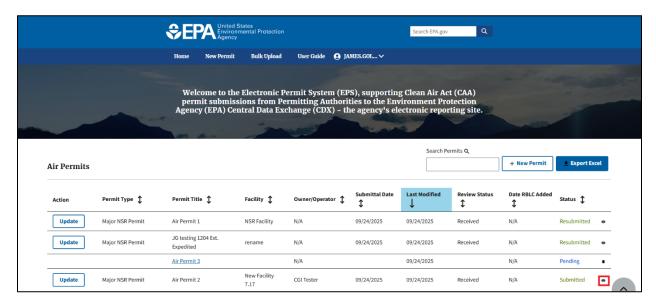


Figure 27

For permits with a status of "Submitted," you can view the permit details, permit review status, comments from EPA, the date EPA completed the review of the permit, the EPA Point of Contact (EPA PoC), and any documentation provided from EPA in the "EPA Shared Files" table. You can also access to



the "Permit Package Documents" table to download any associated files related to your submission as well as the Copy of Record (CoR) (Figure 28).



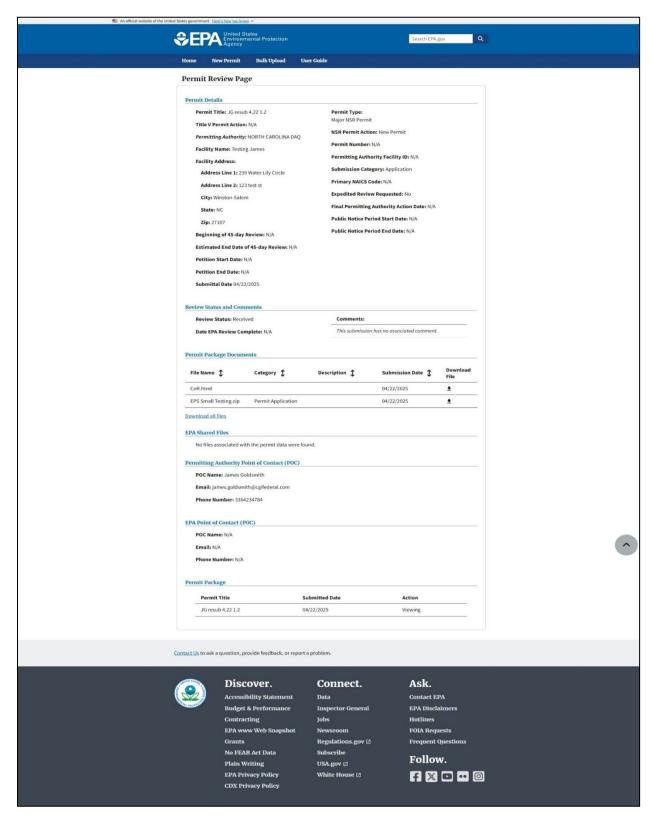


Figure 28



4.1 Accessing Resubmitted Permit Reviews

For permits with a status of "Resubmitted," clicking the eye icon in the "Permits" table takes you to that permit's "Permit Review Page" (Figure 29). You can review all permits included in the package at an individual level. You can do this by navigating to the "Permits table on the bottom of the "Permit Review Page" and clicking the "View" link for the permit you would like to review (Figure 30).

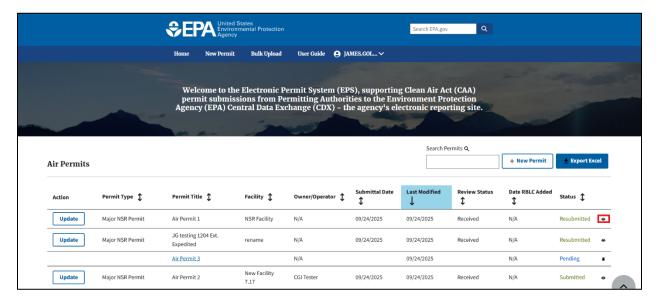


Figure 29



Electronic Permit System (EPS)

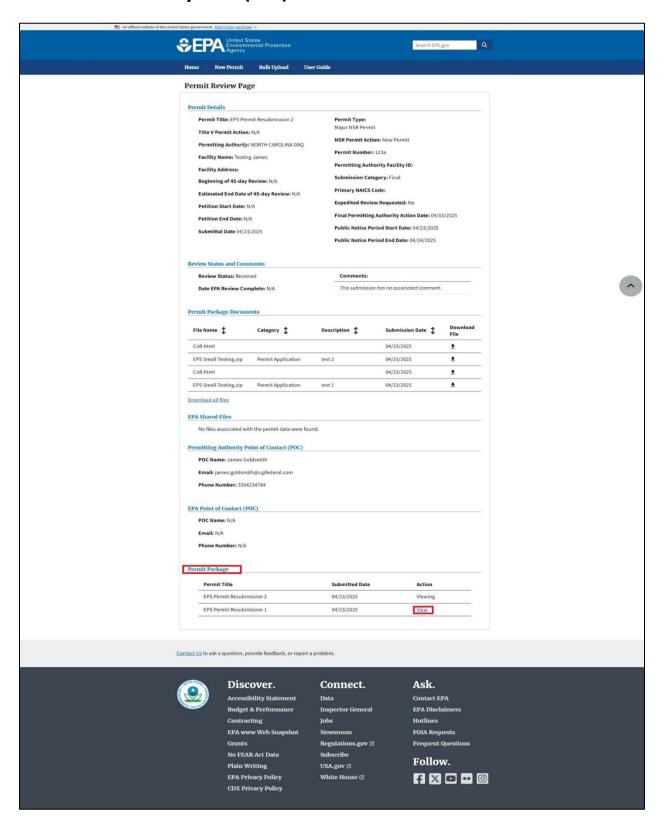


Figure 30



For permits with a status of "Resubmitted," the (1) Review Status and (2) Date EPA Review Complete values are specific to the permit you are viewing. (3) Comments provided by EPA, documentation included in the (4) "Permit Package Documents" table, files shared to the PA by EPA in the (5) "EPA Shared Files" table, and the (6) EPA PoC value displays identically regardless of which permit in the package is being viewed. These fields are cumulatively based (Figure 31). You can download files individually or all files from both the "Permit Package Documents" and "EPA Shared Files" tables (Figure 32) at once.





Figure 31



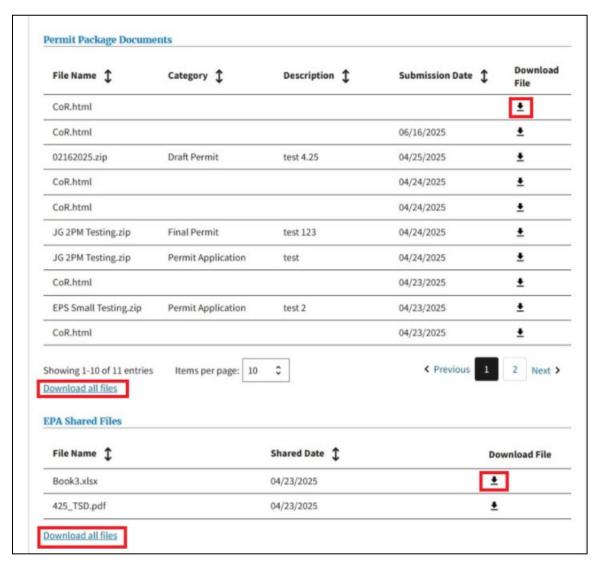


Figure 32

5.0 Introduction to the RACT/BACT/LAER Clearinghouse (RBLC)

The RBLC Data Entry Module gives designated users from SLT agencies the opportunity to input their RBLC information. All RBLC data entries must occur after a final permit is issued because the entries need to reflect the air pollution control technology requirements that are included in the final permit. The RBLC was designed to help permit applications and reviewers to make pollution prevention and control technology decisions for stationary air pollution sources. Users can search for and view all pollution prevention and control technology decisions on the RBLC Search Dashboard.

5.1 Navigating to the RBLC Data Entry Module

After submitting a permit with a "Submission Category" of "Final" in the EPS application, depending on the "Permit Type," you can navigate to the RBLC Data Entry Module to begin entering their RBLC information for the corresponding facility, in one of three ways.



- 1. Click the "Add RBLC Data" button in the "Date RBLC Added" column on the "Permits" table (Figure 33).
- 2. Click the link on the banner at the top of the "Permit Review Page" (Figure 34)
- 3. Click the "+RBLC button under the "RBLC Data" section on the "Permit Review Page" (Figure 34).

Note: At this time, final permits that are Title V Operating Permits, Minor NSR: General Permits, or permits with the "General or Not Source Specific" checkbox checked on the "Source Information" page, do not have the capability to report RBLC information on behalf of a corresponding permit at this time. If your permit is not eligible for RBLC data entry, the "RBLC Date Added" column of the permits table will display as "N/A" (Figure 35). The number of permit types that are eligible for RBLC data entry will likely increase in the future.



Figure 33



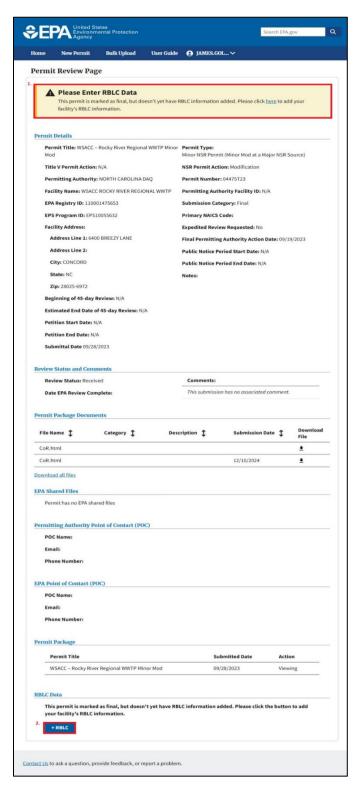


Figure 34





Figure 35

5.2 RBLC Data Entry Module

Once you have navigated to the RBLC Data Entry module, you will add control technology data within the following sections (Figure 36 & Figure 37):

- Process
- Unit
- Pollutant
- Emission Limits
- Control Method



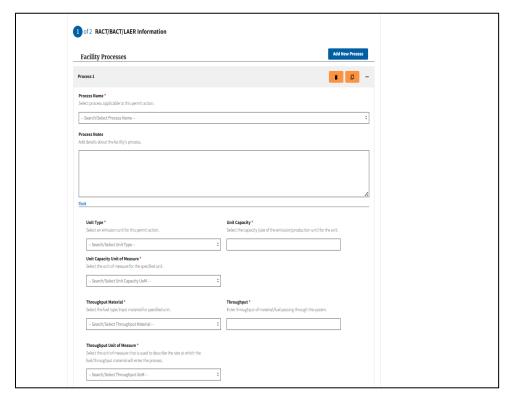


Figure 36 (Scroll 1)



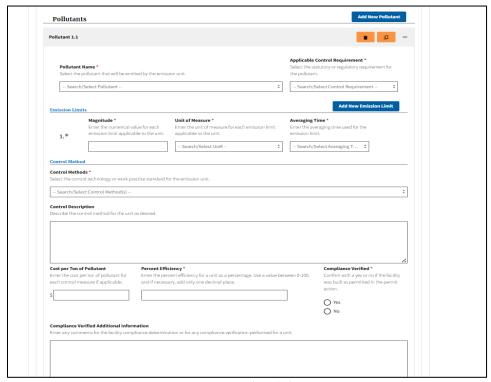


Figure 37 (Scroll 2)

The data is organized so that multiple processes may be added where each process has capacity and throughput data, and can have one or many pollutants, with underlying emission limit and control method data. To add a new "Process," "Pollutant," or "Emission Limit" to your RBLC Data Entry form, click the "Add New Process," "Add New Pollutant," and/or "Add New Emission Limit" buttons (Figure 38 & Figure 39).

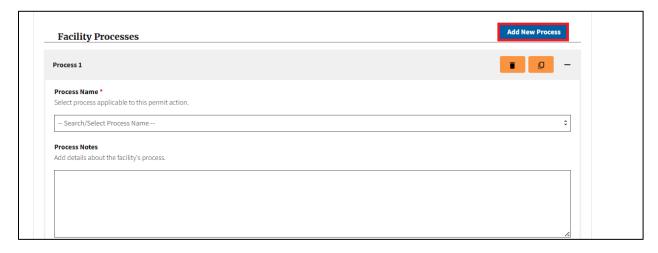


Figure 38



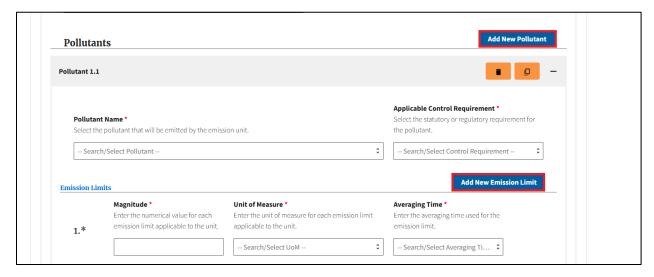


Figure 39

If multiple pollutants or processes have been entered within the RBLC Data Entry form, users can select to collapse or expand a single process or pollutant by selecting the "-" or "+" button in the header of the selected pollutant or process (Figure 40). Additionally, users can select the "Collapse all" or "Expand all" button to collapse or expand all pollutants entered within the RBLC Data Entry form (Figure 41).

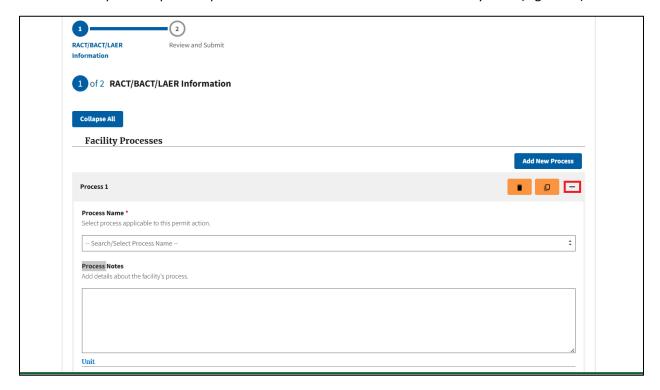


Figure 40



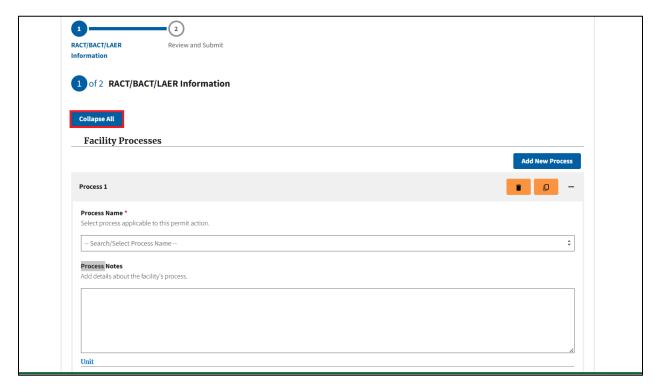


Figure 41

Users also can delete, or duplicate, completed processes and pollutants by using the buttons located in the accordion within the RBLC Data Entry form (Figure 42 & Figure 43). The duplicate button can be used when you have multiple processes that are similar. This will copy the underlying data into a new process, shown at the bottom of your screen, where you can then edit underlying data, as needed. Users can also duplicate pollutant data, however, users can only duplicate pollutants within the same process.

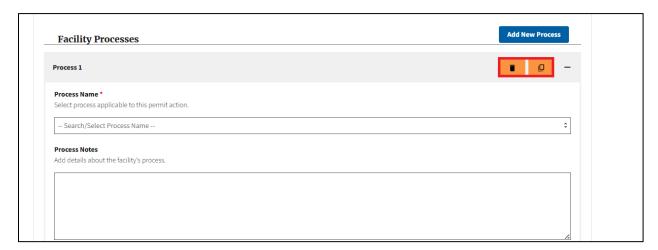


Figure 42



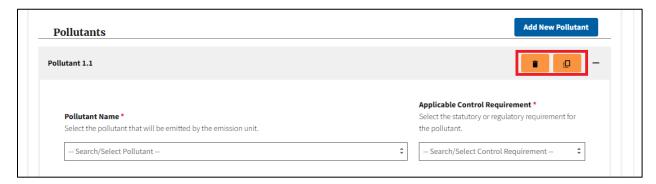


Figure 43

After you complete all required fields on the "RACT/BACT/LAER Information" page, click the "Save and Continue" button to navigate to the "Review and Submit" page within the form (Figure 44). You are then able to review key RBLC information within the corresponding collapsable tables. Additionally, you can view the corresponding "Permit Information" and "Facility Details" for the associated permit action form here (Figure 45).

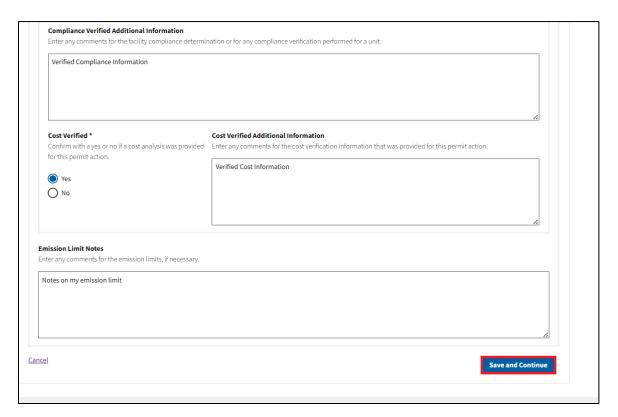


Figure 44



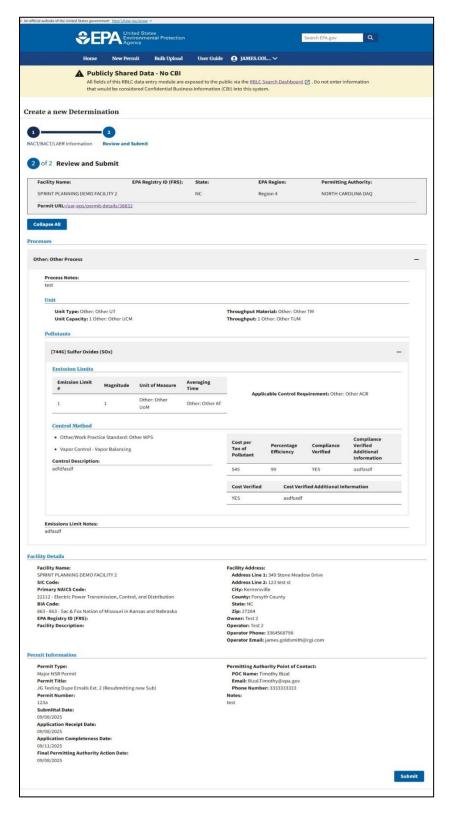


Figure 45



If you see any data you would like to edit, click the "RACT/BACT/LAER Information" text on the progress tracker at the top of the form to navigate to the first page and make the necessary edits (Figure 46). Click the "Save and Continue" button to save any edits on the page.

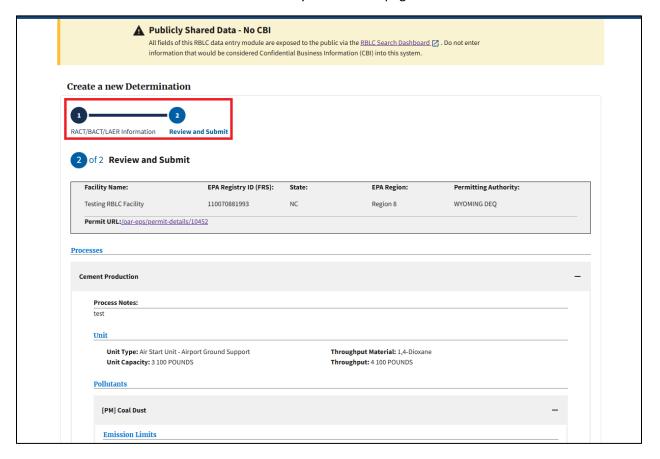


Figure 46

If at any point during the data entry process, you save and leave your data entry form in an in-progress state, you will be able to navigate back to your in-progress RBLC Data Entry form in one of three ways:

- 1. Click the "Resume RBLC Data Entry last updated MM/DD/YYYY" button in the "Date RBLC Added" column on the "Air Permits" table (Figure 47).
- 2. Click the link on the banner at the top of the "Permit Review" page (Figure 48).
- 3. Click the "Finish RBLC Data" button under the "RBLC Data" section of the "Permit Review Page" (Figure 48).



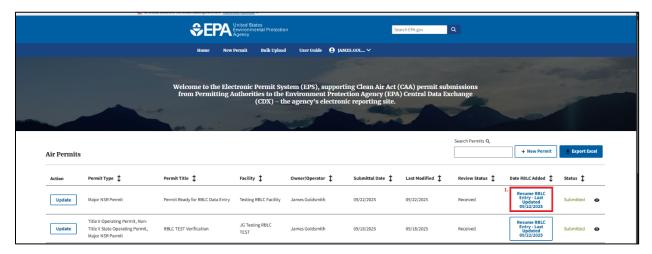


Figure 47





Figure 48



5.3 Submitting RBLC Data

Once you verify the data is accurate on the "Review and Submit" page, click the "Submit" button on the bottom of the page (Figure 49). Once submitted, you are redirected to the "Permit Review Page." When navigating back to the "Air Permits" table, the relevant permit row now includes the date the RBLC data entry was completed in the "Date RBLC Added" column (Figure 50).

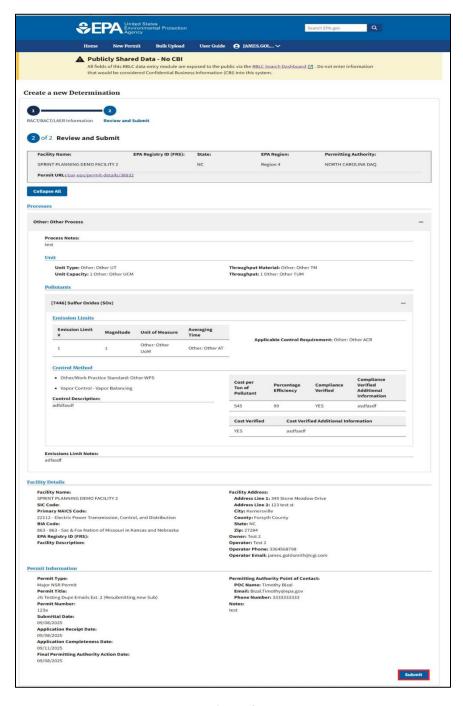


Figure 49



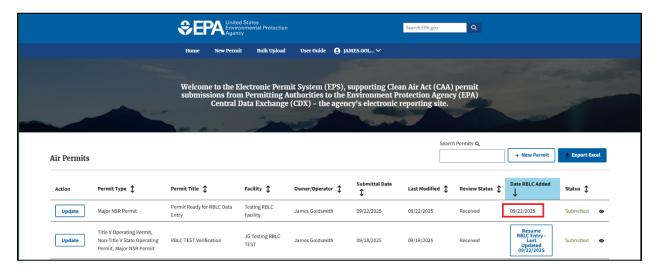


Figure 50

5.4 Reviewing Submitted RBLC Data

Clicking on the eye icon in the "Air Permits" table will take you to the "Permit Review" page for that permit action (Figure 51). This option is only available for permits with a status of "Submitted" or "Resubmitted." At the bottom of the "Permit Review Page," you can navigate to the "RBLC Data" section of the page, where you can click a link redirecting you to the RBLC Search Dashboard "Details" page, where the permit's RBLC data is viewable (Figure 52).

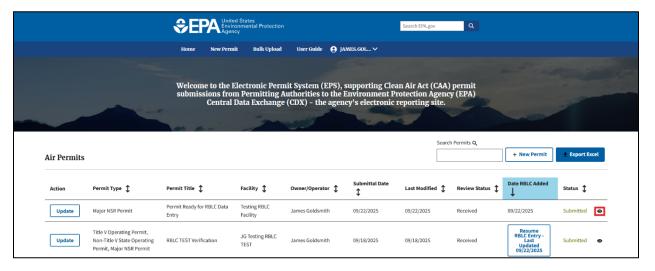


Figure 51





Figure 52

6.0 Glossary

Below is a glossary of terms and acronyms found throughout the EPS application.

BIA	Bureau of Indian Affairs
CAA	Clean Air Act
CoR	Copy of Record
EPA PoC	EPA Point of Contact
EPS	Electronic Permit System
FARR	Federal Air Rules for Indian Reservations
НАР	Hazardous Air Pollutants
NAICS	North American Industry Classification System
NSR	New Source Review
OCS	Outer Continental Shelf
PA	Permitting Authority
PAL	Permitting Authority Landing page
PAL (Source and Permit Type)	Plantwide Applicability Limit
PAP	Permitting Authority Preparer
PAM	Permitting Authority Manager
RBLC	RACT/BACT/LAER Clearinghouse