

Limitations of the Actual and Permitted Emissions Reports

The Louisiana Department of Environmental Quality, Air Permitting Division maintains emission inventory (EI) data of actual emissions of criteria pollutants and toxic air pollutants in the Emissions Reporting and Inventory Center (ERIC). It also maintains Air Permits data in the TEMPO database. The Actual Emissions Report (ERIC data), Permitted Emissions Report (TEMPO data), and other information provided on this website are designed to assist industry with the preparation of permit applications and dispersion modeling input.

The data provided by these reports must be reviewed by the user and will require additional information and verification in order for the data to be determined complete and acceptable for each different usage. Scanned documents in the Public Records EDMS system should be reviewed for any facilities, permits, equipment, and/or release point/stack data, or any other necessary information that may not be captured in the ERIC and TEMPO databases. Information about our Public Records Center is available at <http://www.deq.louisiana.gov/portal/SERVICES/InformationRecords.aspx> or you may view documents in our Electronic Data Management System (EDMS) by visiting our website at www.deq.louisiana.gov.

While the quality of ERIC and TEMPO data has improved through the years, there are limitations to the accuracy, completeness, and consistency of the data. These issues are currently being addressed but have not yet been completely resolved. Meanwhile, it is important that the limitations of the data generated by ERIC and TEMPO for use in air dispersion modeling be recognized. Additional research may be needed during the modeling process to verify ERIC and TEMPO data accuracy or completeness.

Below are specific data quality issues concerning the Actual Emissions Reports (ERIC data) that must be considered by anyone who uses the Actual Emissions Reports data for air dispersion modeling:

- The Actual Emissions Report is a subset of the ERIC database itself. The most complete description of ERIC and its contents is found online at <http://www.deq.louisiana.gov/ERIC>
- Only the most recent 5 reporting years plus Baseline data are available. If you need data for a year not on the dropdown, submit a Public Records Request and we will pull the needed data for you.
<http://www.deq.louisiana.gov/portal/SERVICES/InformationRecords.aspx>
- The report gives the most recent certified data for the ERIC account for the requested reporting year. EI is always one year behind the current calendar year and the most recent reporting year data is usually not available until mid to late summer. For example, reporting year 2012 data will not be available until mid to late summer 2013.

- If the most recent reporting year on the dropdown does not return any results, then the data for that year is not yet available. Try again in a week or so until it is available, usually mid to late summer.
- There are a few reasons why a facility may not have been included in the report. They are:
 - The department has not received a certified inventory for that pollutant for that reporting year.
 - The facility is not subject to LAC 33:III.919 and/or LAC 33:III.5107 and therefore is not required to report EI data in ERIC.
 - The facility was Idle, Permanently Shutdown, or Permitted but not Built for the reporting year and therefore does not have emissions and/or release points.
- Because ERIC data is not static and the department receives revisions throughout the year, some facility data may be missing from the ERIC database at the time the report was generated, and therefore missing from the Actual Emissions Report.
- Facilities often make errors in reporting location coordinates (latitude/longitude or UTM) in ERIC. The department continues to work on correcting these coordinates and implement procedures to prevent recurrences in the future.
- All coordinates are in NAD83.

A few words about the Baseline Actual Emissions Report:

- The Baseline data comes from our legacy EI system – Emissions Inventory System (EIS) and therefore the data for many data elements will be missing.
- In the Baseline data, PM10 is represented as Total Suspended Particulate (TSP).
- It is possible that some existing facilities are not in the Baseline file.
- The Baseline year for each pollutant is defined in LAC 33:III.509.B.

Below are specific data quality issues concerning the Permitted Emissions Reports (TEMPO data) that must be considered by anyone who uses Permitted Emissions Reports data for air dispersion modeling:

- Only current operating permits are listed on the report (Title V or minor source permits). Pending permit applications are NOT included. Specialty permits, such as PSD and Acid Rain, do not have emissions listed separately from the operating permits. The operating permits will have the emissions listed. Variances, Exemptions, Letters of No Objection etc. do not have emissions listed in our system.

- An estimated 19% of facilities in TEMPO have no location coordinates entered and will not appear in Permitted Emissions Reports. All major sources do have coordinates. The "DEQ Activity Number" is an index number that is very helpful if contacting the Department for further information about a permit or if searching the electronic document files (EDMS).
- In the absence of location data on a subject item, the Permitted Emissions Report will pull in the front gate coordinates.
- Many permits were written prior to TEMPO data entry which began in 2003, and thus have no details beyond facility parish, permit number, and permit type (no coordinates, sources, or emissions) these sources will have to be referenced through other means.
- Emissions by source are not consistently entered into the permitting system. Permit organization is flexible and is oriented towards implementation rather than data tracking. Many times this means individual stack information for a given release point is applied in groups rather than individually, or alternate operating scenarios exist which complicate flat emission rates.
- The Permitted Emissions Report includes a group membership column that would be useful when modeling pollutants with annual standards. The group membership is there to help you figure out which sources are part of which group or CAP and will help you to limit double counting of emissions.
- Any and all data substitutions need to be documented in the modeling report. However, there are records in the permitting report where stack information is obviously erroneous or missing. In these cases, it would be acceptable to substitute ERIC data where available or to use EDMS to review the actual permit applications and Emission Inventory Questionnaire (EIQ) sheets submitted to the department. Both of these options are acceptable substitutions.

For questions concerning the report, please email ERIC@la.gov.