USER TRAINING
REPORTING YEAR 2013
## Air Permits Staff

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Webinar Overview

- Emissions Inventory (EI) Basics
- What’s New for RY 2013
- Helpful Hints and Reminders
- Frequently Asked Questions
- User Questions
Emissions Inventory (EI) Basics
What is Emissions Inventory?

- The Emissions Inventory is the report used to collect emissions data required by state and federal regulations.
- There are two programs which require emissions data to be collected:
  - Criteria Pollutants
  - Toxic Air Pollutants
Clean Air Act (CAA) – Section 183 requires a criteria pollutant EI every 3 years for areas of ozone nonattainment

40 CFR Part 51 Subpart A – Air Emissions Reporting Requirements (AERR) – requires annual EI for point sources of criteria pollutants and EI for nonpoint and mobile sources every 3 years for entire state

- Data is submitted by LA to EPA annually
- State data is incorporated by EPA into the National Emissions Inventory (NEI)
STATE REGULATIONS

- **LAC 33:III.918 & 919** – requires all point sources in the state to submit a criteria pollutant EI annually
- **LAC 33:III.5107** – requires all point sources in the state to submit a toxic air pollutant EI annually
Required to report if facility meets any of the criteria at ANY time during the reporting year

- Located in nonattainment or adjoining parish and emits, has the PTE, or is permitted to emit any criteria pollutant above the threshold values in Tables 1-6 (LAC 33:III.919.A.1.a & 2)

- Located in attainment parish and emits, has PTE, or is permitted to emit any criteria pollutant above the threshold values in Table 7 (LAC 33:III.919.A.1.b & 2)

- Major source of HAPS or TAPS (LAC 33:III.919.A.1.c)

- Holds a Title V (Part 70) permit – regardless of emissions (LAC 33:III.919.A.1.d)

- Holds a portable source permit and operates at any time in a nonattainment or adjoining parish AND meets applicability criteria (LAC 33:III.919.A.1.e)

- Otherwise required by rule or permit to report (LAC 33:III.919.A.1.f)
Per Section X of the Minor Source Air General Permit for Crude Oil and Natural Gas Production (MSOG), facilities in a nonattainment area for ozone or an adjoining parish with an MSOG shall submit an EI per LAC 33:III.919

Everyone with an MSOG in the following parishes has to report to EI, regardless of emissions:

- Ascension
- Assumption
- East Baton Rouge
- East Feliciana
- Iberia
- Iberville
- Livingston
- Pointe Coupee

- St. Helena
- St. James
- St. John the Baptist
- St. Martin
- Tangipahoa
- West Baton Rouge
- West Feliciana
PORTABLE SOURCES

If a portable source operates in a nonattainment or adjoining parish at **any time during the reporting year** and meets the applicability of LAC 33:III.919.A.1.a, then they must report to EI (LAC 33:III.919.A.1.e)

- Refers to portable sources with permits issued in accordance with LAC 33:III.513, permit number usually begins with 7777
- Does not apply to portable equipment located at a stationary source

If a portable source must report to EI, then they must report for the entire period of ownership during the reporting year (LAC 33:III.919.F.1.d.iii)
Both the certification statement and the data in ERIC must be submitted by April 30 (LAC 33:III.919.F.1.d)

If hand-delivering, the certification statement must be stamped on or before April 30 with the stamp at the drop off box

If the certification statement comes to us without a date, we will use the date it is received by the Department
LDEQ staff are assigned parishes

Call or send an email to the staff person that is assigned the parish where your facility is located

- A list of parishes and assigned staff is listed on the left sidebar on the ERIC homepage

Please do not call other LDEQ staff asking for help, even if they have helped in the past

- Call those on the list only, please

- LDEQ staff that are not on the list may not be kept up to date with the most recent changes to EI and/or ERIC
Why email before calling?
- Provides more detailed information, and
- Allow us to research the issue aiding in a more complete response

When emailing your staff contact:
- Include the AI #
- Send a screen shot of the error(s) you need help with
- If having problems completing or uploading a spreadsheet, include the spreadsheet
WHAT’S NEW FOR RY 2013
Transition to LDEQ Business Portal
- New Users
- Migrating Existing Users
NACIS and SCC Updates
Emission Type Changes (RY 2014)
Emergency Engine Reporting
ERIC was moved to the LDEQ Business Portal to be in line with other LDEQ online services in October 2013.

- Only slight changes to the look/feel of ERIC
  - Free text search for facilities for users with access to >50 facility accounts
  - Font size and text adjustments
- Requires users to create new account in LDEQ Business Portal

http://business.deq.louisiana.gov/

- Existing access to facility information can be transferred
Before you are able to access facility data in ERIC, you must have an LDEQ Business Portal Account

- Each person should have his/her own portal account
- Portal accounts give varying levels of access to ERIC through different user roles


- Upon completion of registration, you will receive a screen message confirming your account creation.
If you have an existing ERIC account:

Please click this temporary GREEN ERIC button and complete the steps to migrate your existing account information to the business website.

If you have already migrated your existing ERIC account to the new Business website, or;

If you need to Create a New Business Portal Account:

Click this traditional BLUE ERIC Button to Login or Create a New Account.
Welcome to DEQ Business!

The new DEQ business site is designed to help businesses interact with DEQ in a more efficient manner. We will be expanding the functionality of this site as new applications become available. If this is your first time using the DEQ business website, please start by creating a new account. Existing users please login now.
Register for an Account

* indicates a required field.

Please note that for security reasons you will need to create a new account here. This account will be different from the one you used to login to the main DEQ website. Your old account will soon be phased out in favor of this new account.

* Username
Use only letters, numbers and/or underscores

* Password

* Confirm password

Why Register?

Registering for an account at DEQ allows you access to many online services we provide. You can create one account to log into many of our programs online.

If you are having trouble registering a new account, please let us know.

Are You a DEQ Employee?

If so, you already have a login! Just use your DEQ system account to login now.

This is a Secure Site

DEQ uses an industry standard 128 bit SSL encryption to protect your data.

<<Enter Information and Scroll Down>>

* City
Baton Rouge

* State
LOUISIANA

* Zip
70821

* Phone number:
225-219-3404

Phone number (alt):

Create Account
After logging into the ERIC Business Site, users must request access to specific facility accounts within ERIC.

Access to accounts is granted through:

- **Existing Account Administrator** – request is completed in ERIC for administrator to approve in ERIC
  
  * You will need to notify the existing account administrator that your request is pending

- **Pre-registration Code** – LDEQ provides code for facilities that have never submitted to ERIC or no longer have an active account administrator
2013 User Training

TRAINING UPDATE
On January 28, 2014, DEQ will host a webinar that will address those areas of ERIC that have been upgraded or changed since the 2012 reporting cycle. On February 12 & 13, 2014, DEQ will host hands-on user training at the Galvez Building for new users or those needing a refresher on use of the ERIC system. Click Here to visit the Training Registration page for more information!

Emissions Reporting and Inventory Center

Account Selection

You do not currently have access to any ERIC accounts. Please use the links below to access public emissions data, or to request access to one or more accounts.

- Request access to a Facility (EI submitters, responsible officials, or designated consultants only)
- Public Reports
- Show Help Topics
- ERIC Version 10.0.0
Emissions Reporting and Inventory Center

Request Access

Use this form to request access to a facility for Emissions Inventory reporting purposes.

I am an employee of the facility owner, or a designated consultant

Please enter the Agency Interest number(s) you need access to: 

You can request access to more than one AI at a time - just type in the values separated by commas.

The following information will accompany your request. By making this request, you agree to allow this information to be shared with the account manager(s) for the Agency Interest Number to which you are requesting access.

<table>
<thead>
<tr>
<th>First Name:</th>
<th>Kelly</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Name:</td>
<td>Petersen</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:kelly.petersen@la.gov">kelly.petersen@la.gov</a></td>
</tr>
</tbody>
</table>

I have received a preregistration code in the mail

Submit  Cancel
Emissions Reporting and Inventory Center

Request Access

Use this form to request access to a facility for Emissions Inventory reporting purposes.

- I am an employee of the facility owner or a designated consultant
- I have received a preregistration code in the mail

Please enter the AI Number for which you are preregistered: [blank]

Please enter your preregistration code: [blank]

[Submit] [Cancel]
Log in to Old ERIC system using green ERIC link on ERIC Home Page
http://www.deq.louisiana.gov/ERIC

Click the link to transfer your account permissions

You will be prompted to select whether you are a DEQ employee or not

If you are not a DEQ employee, you will then be prompted to log in to an existing account or create a new account on the LDEQ Business Portal

After logging in to your Business Portal Account your permissions will be transferred automatically
If you have an existing ERIC account:

Please click this temporary GREEN ERIC button and complete the steps to migrate your existing account information to the business website.

If you have already migrated your existing ERIC account to the new Business website, or;

If you need to Create a New Business Portal Account:

Click this traditional BLUE ERIC Button to Login or Create a New Account.
Login to Your Account

If you are having trouble logging in, please let us know.

Please note that for security reasons you will need to create a new account here. This account will be different from the one you used to login to the main DEQ website. Your old account will soon be phased out in favor of this new account.

Don’t have an account?
Create One Now! It takes only a few minutes.
NAICS/SCC Updates

- Review your NAICS and SCC Codes!
  - NAICS and SCC Codes have been updated in ERIC to match acceptable EPA codes
  - ERIC validation will require invalid codes to be changed
  - EPA has started comparing ERIC descriptions for sources and processes against SCC codes to identify facilities for further investigation
    - Refineries that don’t show any tank SCC codes
    - Sources described as one thing with an SCC code for another, e.g. a source description of internal floating roof tank, but the SCC code for a Pipeline Vent
  - EPA uses SCC codes to determine rule applicability impacts (among other things)
- Notify DEQ if you are revising prior year inventories to update SCC codes.
Emissions Type Changes

- Existing Emission Types
  - Routine
  - Startup/Shutdown
  - Variance
  - Unauthorized Discharge

- Variance will be replaced with a new category for RY 2014 called "Authorized Non-routine"

- During RY 2013 both Variance and Authorized Non-routine will be available

- After RY 2013 Variance will no longer be available
RY 2013 Emission Types

- **Routine** – Emissions emitted under normal operating conditions. Not restricted to permit limited emissions; e.g., fugitive and area source emissions. Also includes emissions from regulatory permitted activities.

- **Variance** – Emissions emitted through the operations approved by a variance.

- **Authorized Non-routine** – Emissions allowed by rule, statute, variance, or emergency order that are not routine.

- **Startup/Shutdown** – Emissions emitted during startup/shutdown of the emissions path.

- **Unauthorized Discharge** – All other emissions that are not routine, variance, authorized non-routine, or startup/shutdown.
EMERGENCY ENGINE REPORTING

Guidance on how to report emergency engine emissions

- **Maintenance Use** - \( \leq 100 \) hours of permitted non-emergency emissions should be reported as **Routine**

- **Emergency Use** - All use of engines during emergency conditions should be reported as **Authorized Non-routine**

- **Unauthorized Non-Emergency Use** – \( >100 \) hours of non-emergency use of engines, without a variance, should be reported as **Unauthorized**
HELPFUL HINTS/REMINDERS
“Once in, Always In” applies to criteria emissions inventories only (LAC 33:III.919.D)

Once a facility no longer meets the applicability in LAC 33:III.919.A.1 for one full calendar year, must request approval in writing to discontinue submitting an EI

Facilities may stop submitting once they have received approval from LDEQ, in writing

Modifications or otherwise removing the requirement from a permit does not qualify as a release from reporting

If you are a major source of TAPs, you are also subject to criteria EI, and therefore subject to “Once In, Always In”
Submit requests for approval to discontinue submission of criteria pollutant EI to:

Emissions Inventory
Office of Environmental Services

Postal Mail:
P.O. Box 4313
Baton Rouge, LA 70821-4313

For Delivery Only:
602 North Fifth Street
Baton Rouge, LA 70802

Requests must come from the facility

Not currently accepting requests by email or fax
CHANGE IN OWNERSHIP

- When there is a change in facility ownership, each owner is responsible to submit and certify their own EI for the period of ownership (LAC 33:III.919.F.2)
- The start and end dates of the inventory in ERIC must coincide with the ownership dates in TEMPO
- Each owner will have their own ERIC account
- Contact your LDEQ staff contact if you would like the previous inventory submitted by the previous owner
May aggregate GC XVII
- By Permit (not facility-wide)
- Do not combine with Insignificant Activities or Fugitives

Report as source type of GC XVII Emissions

Report as release point type of Area with dimensions of area where activity occurs

Does not require a process record
In addition to criteria pollutants, facilities located in the following parishes are also required to submit HRVOC data for ethylene and propylene (LAC 33:III.919.F.1.a.i):

- Ascension
- East Baton Rouge
- Iberville
- Livingston
- St. Charles
- St. John the Baptist
- St. James
- West Baton Rouge

LAC 33:III.919.F.1.a.iii has additional requirements for facilities in ozone nonattainment areas:

- Ozone season average daily emissions of CO, NOx, VOC, ethylene, & propylene
- Average ozone season throughput
- Ozone season average heat content
- Ozone season estimation method for CO, NOx, VOC, ethylene, & propylene
The certification statement requires an original signature by the Responsible Official (LAC 33:III.919.F.1.c)

The EI must include all emissions from the facility (LAC 33:III.919.F.1.b)

- The only emissions that are exempt are Insignificant Activities on Lists B & C in LAC 33:III.501.B.5
- There are no facility classes or categories exempt from EI reporting (LAC 33:III.919.D.2)

- Special Inventories – LAC 33:III.919.F.3
- Calculations (CEMS vs. AP-42) – LAC 33:III.919.G
- Fees – LAC 33:III.919.I
FREQUENTLY ASKED QUESTIONS
How do I update my facility information?

- Send an email to facupdate@la.gov
  - Mailing Address Updates
  - Front Gate Coordinate Updates
  - EI Contact Updates (must be a facility employee)
    - Send name, address, phone number, email address, and start date.
    - Include a start date for new contact and end dates for previous contact
  - EI Billing Contact Updates
    - Send name, address, phone number, email address, and start date.

Generally takes 1-2 business days for changes
**FREQUENTLY ASKED QUESTIONS**

- **My facility is not yet built, do I need to report?**
  - If your facility meets the applicability in LAC 33:III.919 or Ch. 51, you must report even if your facility was not constructed or is not operating.

- **The facility’s permit was modified mid-year to either subject the facility to emission inventory reporting or to remove the requirement to report. Are the emissions reported just for the time the facility was subject to reporting?**
  - No. Emissions in the inventory are annualized and if the facility was subject to reporting at any time during the reporting year, then the emissions should be for 1/1 to 12/31.

- **Exceptions:**
  - change of ownerships
  - Initial permit issued and ownership begins mid-year
FREQUENTLY ASKED QUESTIONS

Should I subtract the toxic VOCs from my Total VOCs?

- No. You must include your VOC TAPs in your Total VOC.

- ERIC does not automatically include VOC TAPs in the Total VOC. It must be done manually, but VOC TAPs in a “toxic” or “criteria and toxic” inventory will be subtracted from Total VOC for invoicing purposes.

- ERIC has a validation that checks to see if VOC TAPs are greater than Total VOC on the emissions path as well as facility wide. If VOC TAPs are greater than Total VOC, within a tolerance of 25 pounds, users will get an error.

- Do not create a separate Source ID for those emissions sources of toxics. Include criteria and toxics under the same Source ID.
What does this error mean?

`Error inserting process information: Exception of type DEQ.EmissionsInventory.DAO.DAOException' was thrown.; DAO Exception Type UniqueIndexViolation`

This is caused by a duplicate Process ID in the spreadsheet. The same applies to other categories of information where the ID value used by the Facility must be unique across the inventory.
**Frequently Asked Questions**

Can I assign my own Subject Item IDs?

- No. Do not generate Subject Item ID #s.
- The subject item ID is assigned through TEMPO. It can be found in the permit, if generated through TEMPO, or on the list of valid Subject Items in the help text in ERIC.
- The subject item ID field is required. If you do not know it or do not have one assigned, you may enter “Not Listed”.

If a facility is subject to LAC 33:III.919 reporting but is NOT subject to toxic reporting, do we need to include TAP emissions in ERIC?

- No, you do not need to report individual TAP emissions in ERIC if the facility is not required to report to per Ch. 51. However, VOCs that are also TAPS should be included in Total VOCs.
Can Insignificant Activities and GC XVII be aggregated together?
- No. Insignificant Activities, Fugitives, and GC XVII emissions should be reported separately.

Can I make corrections to the emissions on the certification statement?
- No. If any information is incorrect on the certification statement, you must revise the inventory in ERIC and correct the information.
- Handwritten markups do not change the data in ERIC.
Questions?

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Maureen Fleming  m.maureen.fleming@la.gov  225-219-3591