



USER WEBINAR REPORTING YEAR 2015

EMISSIONS INVENTORY STAFF

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WEBINAR OVERVIEW

- Emissions Inventory (EI) Basics
- What's New for RY 2015
- Helpful Hints and Reminders
- Frequently Asked Questions
- Questions?

Emissions Inventory (EI) Basics

APPLICABILITY (ALL FACILITIES)

- ⊙ 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)

“ONCE IN, ALWAYS IN”

- ◎ “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”

RELEASE FROM REPORTING

- ⊙ Request for Release from Reporting form is now available on our website
- ⊙ Must be signed by a Responsible Official
- ⊙ Not currently accepting requests by email or fax

ERIC REPORTING DEADLINE

Saturday

April 30, 2016

- ⊙ Saturday due date does NOT extend actual due date to Monday
- ⊙ Any requests for coordinate or FacUpdate@la.gov changes received after **4:00pm, April 29th** will not be processed until the next business day and will result in a late inventory

ERIC REPORTING DEADLINE

Saturday

April 30, 2016

- ◎ 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

LATE REPORTING

- ⊙ Extensions to the reporting deadline may be granted through a variance request. Variance for ERIC Instructions are available on the ERIC website
- ⊙ Variances must be submitted at least **2 business days** before the due date to be considered
- ⊙ Submittal of the signed Certification Statement determines timeliness regardless of when the data was submitted electronically
- ⊙ Certification Statements not postmarked on or before the April 30th due date without a variance are considered late and will be referred to Enforcement

START EARLY

- ◎ Coordinate and FacUpdate@la.gov changes require LDEQ staff review and are not instantaneous
- ◎ Any requests for coordinate changes or FacUpdate@la.gov received after **4:00pm, April 29th** will not be processed until the next business day
- ◎ Any inventories that cannot be submitted on time because of pending FacUpdate@la.gov and coordinate review/approval issues will be considered late

COORDINATE CHANGES

- ◎ Changes/additions to release point coordinates will continue to trigger a review and require approval
- ◎ The coordinate approval process requires all release points to be updated, if necessary
 - ◎ Multiple release points should not have the same coordinates (Exceptions to this are general condition, insignificant activities, and fugitive emissions)
 - ◎ Release point coordinates should not be the same as the front gate coordinates (Exceptions to this are general condition, insignificant activities, and fugitive emissions)

FACILITY UPDATES

- ⊙ Below are the additions/changes that require a request to FacUpdate@la.gov
- ⊙ El Billing Party
- ⊙ El Facility Contact
- ⊙ Mailing Address
- ⊙ Front Gate Coordinates
- ⊙ Incorrect ownership dates
- ⊙ What to include in FacUpdate@la.gov emails
 - ⊙ Agency Interest Number
 - ⊙ Facility Name
 - ⊙ Brief description of the change needed
 - ⊙ Name, Address, and Phone number for El Billing Party and El Facility Contact
 - ⊙ Date ranges for which the change should apply (does not apply to Front Gate Coordinate changes)

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 (this may require a FacUpdate@la.gov change)
- ⦿ 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

EMISSIONS TYPE UNCHANGED

- ⊙ Existing Emission Types
 - ⊙ Authorized Non-routine
 - ⊙ Routine
 - ⊙ Startup/Shutdown
 - ⊙ Unauthorized Discharge
 - ⊙ Variance
- ⊙ During RY 2015 both Variance and Authorized Non-routine will be available
- ⊙ The replacement of “Variance” with “Authorized Non-routine” category has been put on hold due to USEPA review

RY 2015 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 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

ASKING FOR HELP

- ◎ LDEQ Emissions Inventory staff are assigned facilities based on facility parish location
- ◎ A list of parishes and assigned staff is listed on the left sidebar on the ERIC homepage
 - ◎ Call or send an email to the EI staff person that is assigned the parish where your facility is located first
 - ◎ ERIC@la.gov will send an email to all EI staff
- ◎ Please do not call other LDEQ staff asking for help, even if they have helped in the past
 - ◎ Please contact EI staff only
 - ◎ 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

ASKING FOR HELP

- ◎ 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 2015

WHAT'S NEW

- ◎ Bug fixes
- ◎ Validation updates
- ◎ Other changes
- ◎ Future improvements

BUG FIXES

- ◎ Public reports have been fixed (*kind of*)
 - ◎ Radius search and parish totals
 - ◎ Still have a problem with the 2014 data not pulling
- ◎ Where ozone emissions are not required and not reported, the total ozone season emissions will not appear on the certification statement
- ◎ The error generated for duplicates is now clearer
 - ◎ Please note that for spreadsheet uploads, duplicates are identified one at a time
 - ◎ There is no validation on the Emissions tab for duplicates

BUG FIXES

- ⊙ Users can now request access to multiple owner accounts for the same AI number
- ⊙ Ammonia calculation method for certification statement has been updated to match the other pollutants
- ⊙ EI contacts on the Certification Statement have been corrected
- ⊙ Coordinate change approvals will not be triggered when uploading a new spreadsheet with the same coordinates
- ⊙ Idle processes will be accepted when the associated source is idle

VALIDATION UPDATES

- ② UTM Coordinate validation has been corrected to notify users when the UTM code is missing
- ② The minimum value for ash/sulfur content has been decreased to 0.00015%

OTHER CHANGES

- ⦿ “Responsible Official” option has been removed from the User Role drop down
- ⦿ Any previously assigned responsible officials have been redesignated as Administrators
- ⦿ When clicking on the inventory ID to change the inventory type or end dates, fields that cannot be updated are greyed out
- ⦿ When approving user access, buttons are provided for each pending user request

Outstanding Access Requests:

First Name	Last Name	Email Address	Request Date				
Maureen	Ducote	maureen.ducote@la.gov	1/29/2016	Grant Administrator	Grant Manager	Grant Reader	Reject Request

FUTURE IMPROVEMENTS

- ◎ We keep a running list of bugs and suggested improvements throughout the reporting period
- ◎ ERIC issues and suggestions that were not able to be addressed have been carried forward from the 2014 RY
 - ◎ All user requested changes from 2014 were addressed
 - ◎ A few LDEQ requested changes were put on hold
- ◎ A conference call to discuss all RY 2015 suggested improvement will be held on May 3, 2016 at 9:30am CST
- ◎ Email comments and additional suggestions to ERIC@la.gov

HELPFUL HINTS/REMINDERS

COORDINATES

- ◎ Fugitives, General Condition XVII, and Insignificant Activities should only have one release point ID if the area is the same
- ◎ Multiple release points should not have the same coordinates (Exceptions to this are general condition, insignificant activities, and fugitive emissions)
- ◎ Release point coordinates should not be the same as the front gate coordinates (Exceptions to this are general condition, insignificant activities, and fugitive emissions)
- ◎ Guidance for using online sources for coordinates is available on the ERIC Website under *Helpful Links and Guidance Documents*

[Using Online Sources to Determine Coordinates](#)

NAICS/SCC UPDATES

- ◎ Review your NAICS and SCC
 - ◎ The full, current EPA SCC table is provided with instructions on how to identify the correct SCC code for your process on the LDEQ Homepage as [EPA Source Classification Codes \(SCC\)](#)
 - ◎ NAICS and SCC have been updated in ERIC to match acceptable EPA codes
- ◎ EPA has started comparing ERIC descriptions for sources and processes against SCC to identify facilities for further investigation
 - ◎ Refineries that don't show **any** tank SCC
 - ◎ 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 to determine rule applicability impacts (among other things)

EMERGENCY ENGINE REPORTING

- ◎ Guidance on how to report emergency engine emissions
 - ◎ **Maintenance Use** - ≤ 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**

GENERAL CONDITION XVII EMISSIONS

- ◎ 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

HRVOC AND OZONE REQUIREMENTS

- ⊙ 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, NO_x, VOC, ethylene, & propylene
 - ⊙ Average ozone season throughput
 - ⊙ Ozone season average heat content
 - ⊙ Ozone season estimation method for CO, NO_x, VOC, ethylene, & propylene

ADDITIONAL INFORMATION

- ◎ 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

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- ◎ **My facility is not yet built or idle, 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
 - ◎ No data is required but the facility status must be marked appropriately
 - ◎ Guidance can be found on the ERIC Homepage under [Editing the Facility Status in ERIC](#)

- ◎ **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.

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 cannot 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.

FREQUENTLY ASKED QUESTIONS

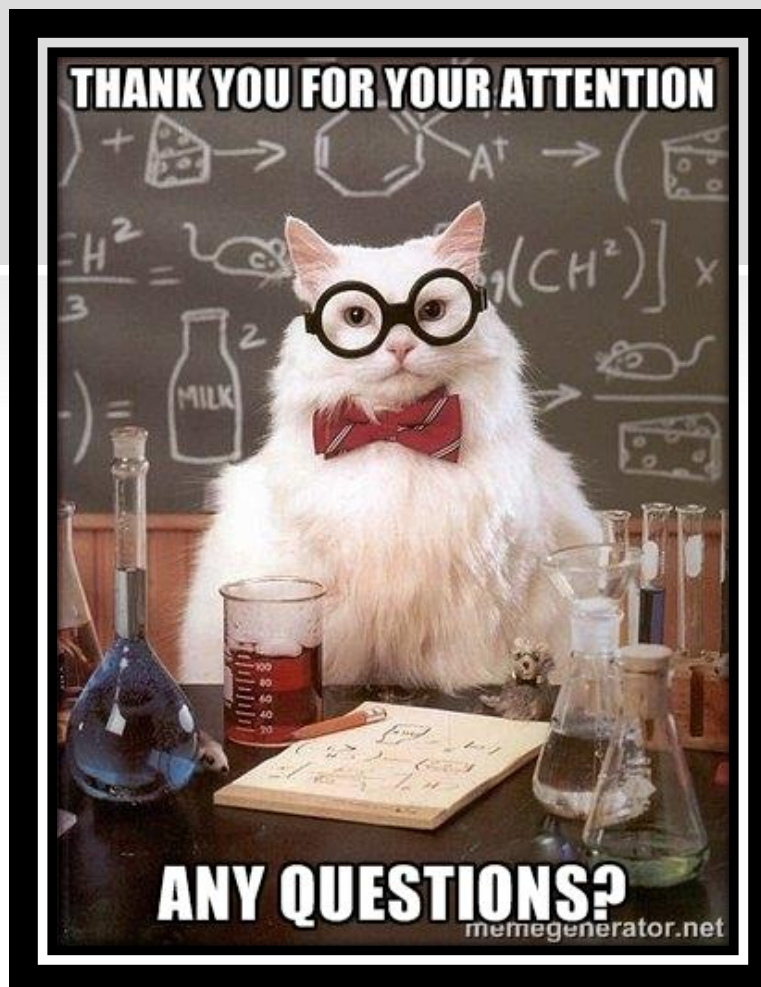
- ◎ **Can Insignificant Activities and GC XVII be aggregated together?**
 - ◎ No. Insignificant Activities, Fugitives, and GC XVII emissions should be reported separately
 - ◎ However, they may share the same release point
- ◎ **Can I make corrections to the emissions on the certification statement?**
 - ◎ 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

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