

Reporting Calendar Year 2007 Emissions in ERIC

DEQ is not proposing any significant changes to the data elements to be reported in ERIC for this reporting period. Remember that the deadline for both the criteria and toxics emissions reporting is March 31, 2008.

Based on feedback, some system changes have been made to assist users and these include:

1. For all instances of Subject Item ID, an option in the drop-down list has been added for “Not Listed”. This will address instances where a facility does not have a TEMPO permit or where the permit may not have been modified. This is now a REQUIRED field.
2. *Annual Average Heat Input* has been renamed *Average Annual Heat Content* and reporting is in MMBtu.
3. *Ozone Season Average Heat Input* has been renamed *Ozone Season Average Heat Content* and reporting is in MMBtu.
4. Data Elements that are proposed to remain as **optional** include:
 - a. All instances of *Latitude* and *Longitude*
 - b. *Engine Rating*
 - c. *Firing Type*
 - d. *Ozone Season Ash Content*
 - e. *Ozone Season Sulfur Content*
 - f. *Release Point Moisture Content*
5. Data Elements that are turned off and which will **not** be available for input include:
 - a. *MACT Codes*
 - b. *MACT Compliance Status*
6. Reporting emissions under CAPs
 - a. DEQ’s transition year guidance (going from 2005 to 2006) stated: *If you reported a CAP as a single NEDS ID for RY2005, you may report the CAP as a single ERIC source for RY2006.* To accomplish this, facilities were instructed to create an emissions path for the CAP. The transition year guidance went on to say: *If you reported sources under a CAP as individual NEDS IDs for RY2005, then report as individual ERIC sources for RY2006*
 - b. DEQ’s general guidance from 2006 has not changed and states: If emissions are calculated for sources under a CAP individually, then facilities should report them as individual ERIC sources, making sure that the CAP is not reported as a source (to eliminate double counting of emissions); likewise, if emissions are calculated across the CAP in aggregate, then report the CAP as a single ERIC emissions path.
7. Miscellaneous
 - a. Ozone Season is defined as May 1 – September 30 (Chapter 22)
 - b. Regarding the separation of tank breathing and working losses

- i. LDEQ has consulted with EPA and at this time, we are not requiring facilities to separate out the emissions. Facilities may choose one SCC and report all the tank emissions (breathing/working/standing losses) under it.
 - c. Web and upload validation improvements that include:
 - i. Inventories must now have required information completed on both the Facility Tab and Contact Tab before they can be submitted. Because this information comes from TEMPO, ERIC users should submit any TEMPO change requests at the start of the inventory cycle to ensure that the information is updated PRIOR to the time that the facility is attempting validation.
 - ii. Facilities must now enter the appropriate units (tons or pounds) with the pollutant. Values will be presented in a dropdown menu.
 - iii. The Excel spreadsheet format for uploading/downloading inventory data to and from ERIC has been revised and simplified to provide more flexibility to ERIC users. The basic layout has remained mostly unchanged to minimize disruption, particularly for users who have modified their internal systems to generate the spreadsheet data. Additions and changes to columns have been made only where necessary for the 2007 reporting requirements. The main change in the spreadsheet is the removal of many of the locks that exist in the 2006 version. The new spreadsheet format will allow you to sort rows, re-order columns, insert rows and columns, and modify cell formatting. In addition, the need for a fixed number of pre-populated rows has been eliminated resulting in significantly smaller file sizes and improvements in the upload and download times. Full details on the new format, including a blank template and a list of changes from the prior version, will be posted when the 2007 reporting period in ERIC is enabled.
- 8. *Emissions Record Type* – This is still an optional requirement for 2007, however you may be interested to know that changes were made to the choices in the pull-down list. Note that for 2008 emissions, this will be a required field. See the guidance document for 2008 for more information. The current choices are:
 - a. **Routine** – Refers to emissions that are authorized and permitted and which **do not** include any startup/shutdown emissions.
 - b. **Routine & Startup/Shutdown** – This is a new choice for users. This type is used to report authorized startup/shutdown emissions; ie. those that are specifically included in a permit.
 - c. **Startup/Shutdown** – Refers to emissions that are authorized and permitted separately from routine emissions. Facilities should report these under the applicable source.
 - d. **Unauthorized Discharges** – This was renamed from “Emergency Releases/Upsets/Malfunctions. This is based on OSEC rule definition. DEQ prefers that emissions be reported either at the Source / Process / Release / Emission Point level for the point source, however, if this is not possible, then you can create a new emissions path record to represent the

entire facility or the “unit” level (i.e. Glycol unit, Amines unit, etc). This will be required at the “unit” level for 2008 emissions. *Definition: a continuous, intermittent, or one-time discharge, whether intentional or unintentional, anticipated or unanticipated, from any permitted or unpermitted source which is in contravention of any provision of the Louisiana Environmental Quality Act (R.S. 30:2001 et seq.) or of any permit or license terms and conditions, or of any applicable regulation, compliance schedule, variance, or exception of the administrative authority.*(Air Regulations Section 3905).

- e. **Variance** – Facilities must report Source/Process/Release/Emission Point level for the point source or can create a new emissions path record to represent the facility “unit” level (i.e. Glycol unit, Amines unit, etc).
9. Release from Reporting
- a. The Air Quality Assessment Division will no longer be reviewing or taking action on requests from facilities that feel that they no longer meet the applicability for criteria and/or toxic emissions inventory reporting per LAC 33:III.919 and/or LAC 33:III.5107. Facilities should contact the Permits Division to get reporting requirements removed from their permits if they no longer have an obligation to report their emissions.

Please note that changes to Chapter 51 Regulations will be final on December 20, 2007 and have an impact on facilities that report toxic emissions. See the full text of the rule to determine its applicability to your situation.

Section 5107 reads, “Beginning with the report due in 2008, the annual emissions report shall meet the following requirements. 1. a. The owner or operator of any major source subject to the requirements in this Subsection shall submit a completed annual emissions report to the Office of Environmental Assessment, Air Quality Assessment Division, on or before March 31 of each year, unless otherwise directed by the administrative authority, that shall identify the quantity of emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3, for the previous calendar year.”