

Emissions Reporting and Inventory Center

USER TRAINING Reporting Year 2013



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2



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





FEDERAL REGULATIONS

- 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





APPLICABILITY (ALL FACILITIES)

- Required to report if facility meets any of the criteria at <u>ANY</u> 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 <u>permitted to</u> <u>emit</u> 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)



MSOG PERMITS (NOTWITHSTANDING 919)

- 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 El per LAC 33:III.919
- Everyone with an MSOG in the following parishes has to report to El, 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 <u>any time during the reporting year</u> 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)





ERIC REPORTING DEADLINE

April 30, 2014

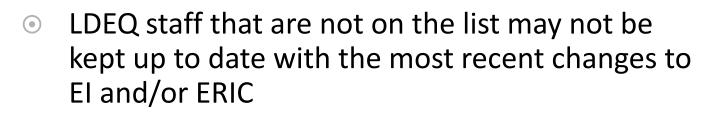
- Both the certification statement and the data in ERIC must be submitted by April 30 (LAC 33:III.919.F.1.d)
- If hand-delivering, the certification statement must be stamped on or before April 30 with the stamp at the drop off box
- If the certification statement comes to us without a date, we will use the date it is received by the Department





ASKING FOR HELP

- 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







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







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WHAT'S NEW FOR RY 2013



WHAT'S NEW

Transition to LDEQ Business Portal

- New Users
- Migrating Existing Users
- NACIS and SCC Updates
- Emission Type Changes (RY 2014)



Emergency Engine Reporting



ERIC MOVE TO LDEQ BUSINESS PORTAL

- 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/



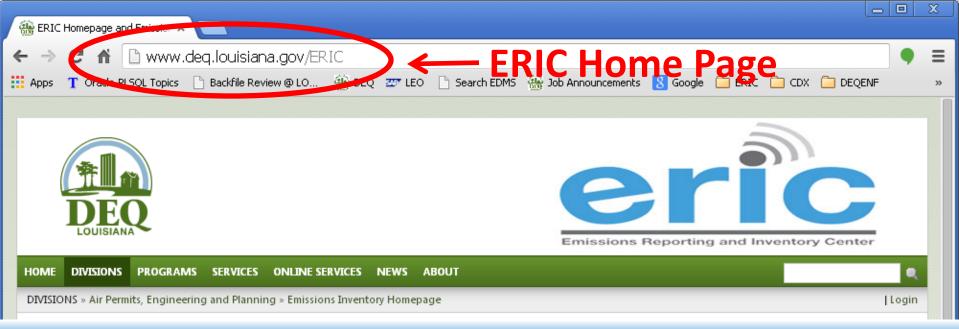
Existing access to facility information can be transferred



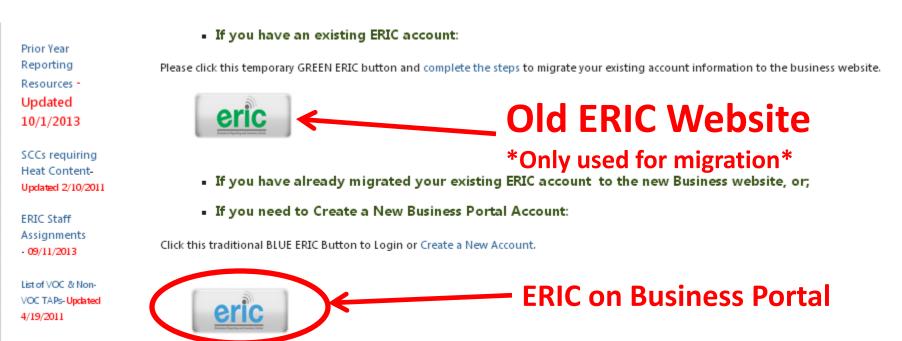
NEW ERIC USERS STEP 1 OF 2: CREATE AN ACCOUNT

- 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
- Register for a Portal Account at the LDEQ Business homepage: <u>http://business.deq.louisiana.gov/</u>
 - Upon completion of registration, you will receive a screen message confirming your account creation.

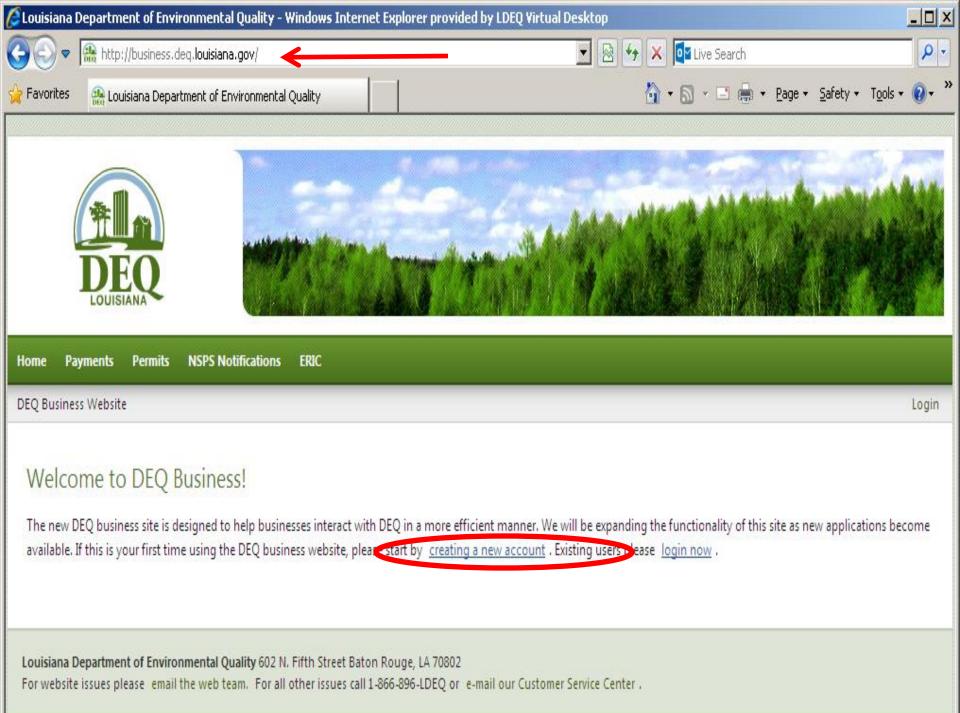




<<Scroll Down>>



Valid NAICS



Register for	an Account Louisiana Department of Environmental Quality	- Windows Internet Explorer provided by LDEQ Virtual De	
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Use only lett	ers, numbers and/or underscores	Are You a DEQ Employee?	
* Password		If so, you already have a login! Just use your DEQ account to <u>login now</u> .	system
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225-219-3404

Create Account



NEW ERIC USERS STEP 2 OF 2: REQUEST ACCESS

- After logging into the ERIC Business Site, users must request access to specific facility accounts within ERIC
- Access to accounts is granted through:
 - <u>Existing Account Administrator</u> 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
 - <u>Pre-registration Code</u> LDEQ provides code for facilities that have never submitted to ERIC or no longer have an active account administrator



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Home Payments Permits NSPS Notifications ERIC						
DEQ Business Website	Logged in as: KPeterser	n Logout				
O You're now logged in!						
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. <u>Click Here</u> to visit the Training Registration page for more information!						
Emissions Reporting and Inventory Center	ERIC Resources P	'age 🗗				
Account Selection						
You do not currently have access to any ERIC accounts. Please use the links below one or more accounts.	<i>i</i> to access public emissions data, or to request acce	ess to				
Request access to a Facility (EI submitters, responsible officials, or designated consultants of	nly)					
Public Reports						
💯 Show Help Topics						

ERIC Version 10.0.0



Request Access

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

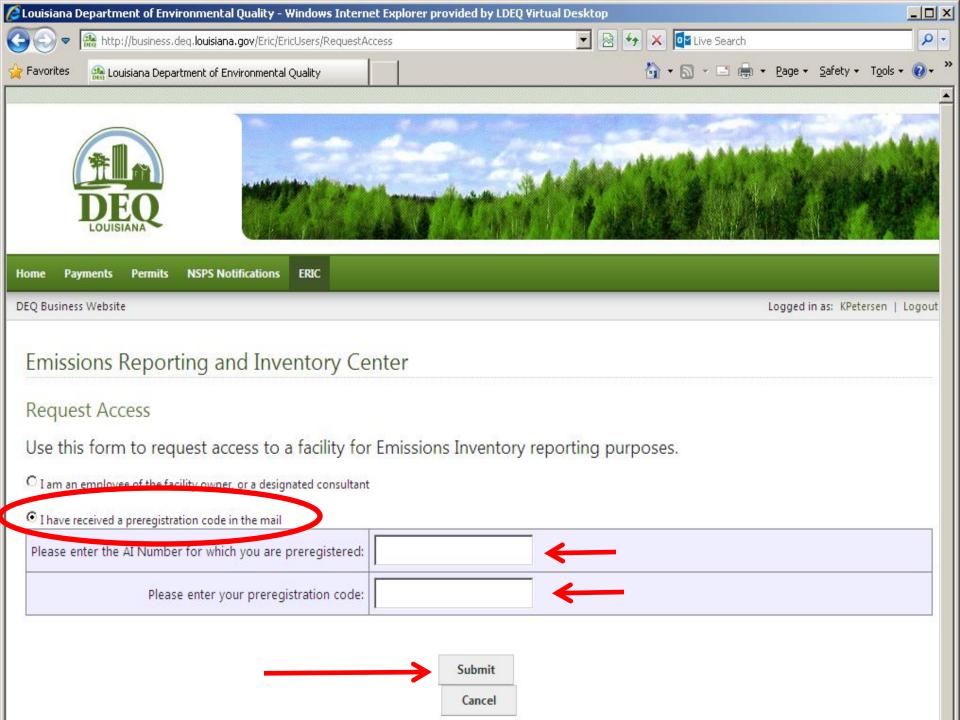
I am an employee of the facility owner, or a designated consultant			
Please enter the Agency Interest humber(s) you need access to:		\	
You can request access to more than one AI at a time - just type in the values separated by commas.			

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.

First Name:	Kelly
Last Name:	Petersen
Email:	kelly.petersen@la.gov

I have received a preregistration code in the mail







EXISTING USERS MIGRATE PERMISSIONS

Log in to Old ERIC system using green ERIC link on ERIC Home Page <u>http://www.deq.louisiana.gov/ERIC</u>



Click here to transfer your permissions to the new ERIC website.

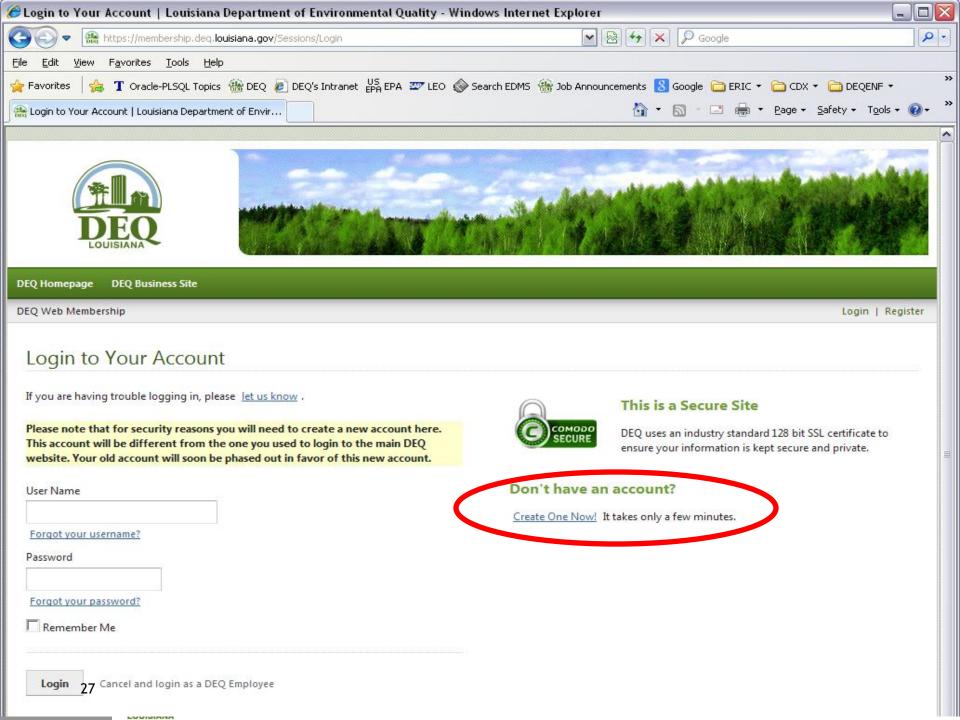
- You will be prompted to select whether you are a DEQ employee or not
- If you are not a DEQ employee, you will then be prompted to log in to an existing account or create a new account on the LDEQ Business Portal



After logging in to your Business Portal Account your permissions will be transferred automatically



Valid NAICS





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.



30

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 ≤ 100 hours of permitted nonemergency emissions should be reported as Routine
 - Emergency Use All use of engines during emergency conditions should be reported as Authorized Non-routine
 - Unauthorized <u>Non-Emergency</u> Use >100 hours of nonemergency use of engines, without a variance, should be reported as Unauthorized







Emissions Reporting and Inventory Center

HELPFUL HINTS/REMINDERS



"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

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





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 <u>ethylene and propylene (LAC 33:III.919.F.1.a.i)</u>

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



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 El 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









How do I update my facility information?

- Send an email to <u>facupdate@la.gov</u>
 - Mailing Address Updates
 - Front Gate Coordinate Updates
 - El 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



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





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.





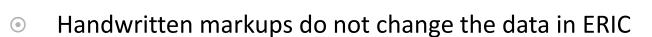
Can I assign my own Subject Item IDs?

- 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







Questions?

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