



Emissions Reporting and Inventory Center

USER WEBINAR REPORTING YEAR 2016



EMISSIONS INVENTORY STAFF

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WEBINAR OVERVIEW

- Emissions Inventory (EI) Basics
- What's New for RY 2016
- 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

Sunday

April 30, 2017

- ⦿ Sunday due date does NOT extend actual due date to Monday
- ⦿ Any requests for coordinate or FacUpdate@la.gov changes received after **4:00pm, April 28th** will not be processed until the next business day and will result in a late inventory

ERIC REPORTING DEADLINE

Sunday

April 30, 2017

- ◎ 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
- ⊙ To be considered, variances must be submitted at least **2 business days** before the due date
- ⊙ 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 28th** 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
 - ⊙ EI Billing Party
 - ⊙ EI 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 EI Billing Party and EI 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

RY 2016 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 2016

WHAT'S NEW

- ⊙ Parameter updates
 - ⊙ Chromium, Total
 - ⊙ Lead (and compounds)
- ⊙ PM emissions clarification
- ⊙ Minimum Reporting Requirements

PARAMETER UPDATES

- ① **Chromium** - A new parameter, “Chromium, Total”, has been added for reporting Chromium when speciated Chromium VI data is unavailable.
- ① **Lead** - The parameter description for the TAP, “Lead compounds”, has been revised to “Lead (and compounds)” for consistency with other parameters.

PM EMISSIONS CLARIFICATION

- ① All PM emissions reported to ERIC should be the Primary (filterable + condensable) PM.
- ① The parameter labels for PM_{10} and $PM_{2.5}$ do not specify that the combined filterable and condensable PM should be included. This is in line with the PSD and NNSR regulations:

PM_{2.5} emissions and PM₁₀ emissions shall include the gaseous emissions from a source or activity which condense to form particulate matter at ambient temperatures. On or after January 1, 2011, such condensable particulate matter shall be accounted for in applicability determinations and in establishing emissions limitations for PM_{2.5} and PM₁₀ in NNSR permits.

MINIMUM REPORTING REQUIREMENTS

- ⦿ **Minimum Reporting Requirements** (emissions path/source)
 - ⦿ Criteria pollutants emitted in a quantity less than 0.0005 tons per year (TPY) do not need to be reported.
 - ⦿ Toxic pollutants in quantities less than .0005 tons or 1 lb do not need to be reported.

*Exceptions to this rule are chlorinated dibenzofurans and chlorinated dibenzo-p-dioxins

- ⦿ **Decimal Places** - The annual emission rate in tons per year (TPY) should generally be listed to two (2) decimal places, with the following exceptions:
 1. All other TAPs that have an MER of 50 lbs/year or less must be rounded to three decimal places
 2. Chlorinated dibenzofurans and chlorinated dibenzo-p-dioxins must be rounded to six (6) decimal places

FUTURE IMPROVEMENTS

- ① We keep a running list of bugs and suggested improvements throughout the reporting period
- ① A conference call to discuss all RY 2016 suggested improvement will be held on May 3, 2017 at 9:30am CST
- ① 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

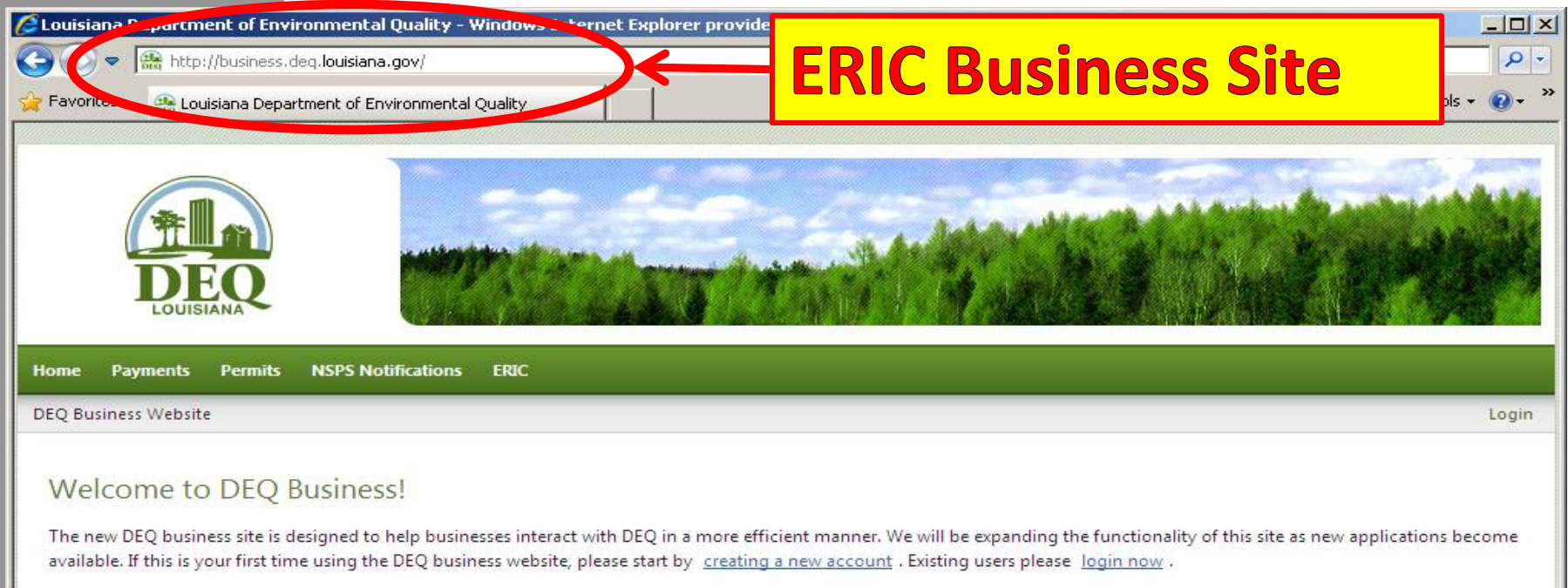
- ⦿ The certification statement requires an original signature by the Responsible Official (LAC 33:III.919.F.1.c)
- ⦿ The EI must include all emissions from the facility (LAC 33:III.919.F.1.b)
 - ⦿ The only emissions that are exempt are Insignificant Activities on Lists B & C in LAC 33:III.501.B.5
 - ⦿ 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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- Cant log in??
 - Make sure you are on the right webpage:
<http://business.deq.louisiana.gov>



FREQUENTLY ASKED QUESTIONS

- ⦿ **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 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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