

Emissions Inventory General Issues

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Emission Inventory Manager**

**Air Quality Workshop
February 4th, 2016
Tulsa, OK**

Topics To Discuss

- Change of Ownership or Personnel
- Operating Statuses
- Data Issues & Typical Problems
- Annual Operating Fee Invoicing Process
- Other Inventory Programs

Change of Ownership or Personnel

Change of Ownership

Responsibilities of the:

- Transferor (Seller)

“The transferor shall notify the DEQ using a prescribed form no later than 30 days following the change in ownership.”

- Transferee (Purchaser)

“The transfer of ownership of a stationary source or a facility is an administrative amendment that shall subject the new owner or operator to existing permit conditions &/or compliance schedules.”

Change of Ownership

- What this means for the new owner:
 - Responsibilities transfer unless explicitly stated in contract or sale agreement
 - New owner is responsible for providing the complete year's inventory
 - Even if sale took place within the reporting year

Request for Transfer and Administrative Amendment of Permit Form #100-883

AIR QUALITY DIVISION
ADMINISTRATIVE CHANGE NOTIFICATION
 Request for Transfer and Administrative Amendment of Permit

Oklahoma Dept. Of Environmental Quality
 Air Quality Division
 707 N Robinson, Suite 4100, P.O. Box 1677
 Oklahoma City, Oklahoma 73101-1677

FACILITY INFORMATION					
Facility Name (Current)					
Operating Permit No.					
Legal Description	Section		Township		Range
Latitude (to 3 Decimals)			Longitude (to 3 Decimals)		
UTM coordinates	Horizontal		Vertical		Zone
Physical Address or Driving Directions					
City or Nearest Town			County		Zip

INFORMATION UPDATE		
INFORMATION ITEM	PREVIOUS/CURRENT (Transferor)	NEW (Transferee)
Facility Name	[Listed Above]	
Company Name (Owner/Operator)		
Headquarters Mailing Address		
City		
State		
Zip		
Responsible Official (Name)		
Title		
Phone		
Fax		
Email Address		
Technical Contact (Name)		
Title		
Phone		
Fax		

(Just) Changing a Responsible Official Form #100-882

<http://www.deq.state.ok.us/AQDnew/resources/aqforms.htm>



Designation of Responsible Official
Oklahoma Department of Environmental Quality, Air Quality Division
P.O. Box 1677
Oklahoma City, OK 73101-1677
(405) 702-4100 (Tel), (405) 702-4101 (Fax)

Use DEQ form #100-882 to notify the Air Quality Division of a change in Responsible Official
Please mail completed form to the Air Quality Division
(For other changes, please use DEQ form #100-883 – Administrative Change Notification)

1. Company and Responsible Official (RO) Details (please print)

Company Name		RO Name	
Company Address		RO Email	
City		RO Address	
State, Zip		City	
Phone		State, Zip	
Fax		Phone	

2. Responsible Official, pursuant to, Oklahoma Administrative Code (“OAC”), Air Pollution Control, Title 252, Chapter 100-1-3. Definitions.

Please Check One

- (A) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall production, or operating facilities applying for or subject to a permit and either:
(i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
(ii) The delegation of authority to such representatives is approved in advance by the DEQ;
- (B) For the partnership or sole proprietorship: a general partner or the proprietor, respectively;
- (C) For a municipality, state, federal, or other public agency: Either a principal executive officer or ranking elected official. For purposes of this Chapter, a principal executive officer or installation commander of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of EPA); or
- (D) For affected sources:
(i) The designated representative insofar as actions, standards, requirements, or prohibitions under Title IV of the Act or the regulations promulgated thereunder are concerned; and
(ii) The designated representative for any other purposes under this Chapter.

Changing a Main Facility Contact

- Inventory questions are initially presented to the Main Facility Contact
- Changes can be made simply by emailing the EI section with the name, title, address, phone number, and email of the person.
- A form is not necessarily required.
 - aei@deq.ok.gov

Operating Statuses

Facility Status

- If Not Yet Built or Idle last year, we reset to Active for the new Reporting Year
- Facility operating status must be verified yearly
- If the facility was active at any time, status is Active for that Reporting Year

Facility Status

- “Not yet built” Status
 - E.g., permit applied for in 2015 but construction has not yet started
 - Add a brief facility note if necessary
- Exempt or De Minimis facilities must be removed completely from Redbud
 - Please contact us to do so

Emission Unit Status

Operating & Temporarily Shutdown:

Remains in your inventory next year

Permanently Shutdown:

Drops out from your inventory next year

- Example: Emission unit operated through June 2014 then physically removed from the facility in September 2014

Status for 2014 - Operating

Status for 2015 - Permanently Shutdown

Status for 2016 - Not in inventory

Replacement Equipment

- Don't change the existing unit
- Create a new emission unit
- Report data for original & replacement equipment separately
- Include notes explaining the situation at both units
- Report original equipment as permanently shutdown the next year. It will then drop out of the inventory the year after that.

Data Issues & Typical Problems

Ensure Data is Consistent

If Emission Unit Status = Active



Operating Hours should be > 0



Process Rates should be > 0



At least some emissions would normally be reported

Storage Tank Emissions

- Emissions released from the bottom of a tank that has no throughput must be reported
 - Tank would be reported as Active
- Tanks linked together can be reported as a single emission unit
- Combined SCC 40400311 (working + breathing + flashing) may be used for condensate tanks with < 6 ton per year total VOC emissions
- Create new process if changing to SCC 40400311. Don't change the SCC at an existing process.

Other Typical Problems

- Permit not cancelled if facility has closed
- Omitting a facility that should be reported
- Not using informative names for emission units
- Selecting the wrong Material I/O for a process
 - Used, Produced, Existed
- Not listing the primary source of the emission factor
- Using lbs/hr as the emission factor inappropriately
- Basic mistakes in data entry and calculations

Annual Operating Fee Invoicing Process

Annual Operating Fee Invoicing Process

- Two years in arrears
- Sent out July 1
- Vital to have correct Responsible Official information
- Can't double bill for pollutants
 - Only billed for Total VOC, invoice will list HAP and VOC (non-HAP) amounts
 - Will only bill for PM-10 (PM-2.5 is a subset of PM-10)

Annual Operating Fee Invoice



OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division

Mailing Address:
Department of Environmental Quality
Administrative Services - Accounts Receivable
P O Box 2036
Oklahoma City, OK 73101

DEQ's FEI # 73-6017987

2015 AIR QUALITY ANNUAL OPERATING FEE BASED UPON EMISSIONS REPORTED FOR 2013

Account: 0000421698



Invoice: 50028378
Invoice Date: 7/01/2015
Due Date: 7/31/2015
Purchase Order: [Redacted]

Note: Authorized Fees: (See back of invoice)
Emissions Inventory Questions: Michelle Horn 405-702-4176
Accounts Receivable Questions: 405-702-1130

PS ID: 292150701 60378

STATE OF OKLAHOMA - 2013 REPORTED EMISSIONS (SEE INSTRUCTIONS ON REVERSE)

Company ID: 3499

FACILITY INFO	TONS OF REGULATED AIR POLLUTANT							
	TOTAL BILLABLE	CO*	HAP	NOX	PM-10	SOX	TOX	VOC
SEE SUMMARY	146.951	84.256	5.537	111.316	1.333	0.058	0.000	28.707

*CO tons are not included in billable tons.

FEE CALCULATION

TOTAL TONS	RATE PER TON	TOTAL FEE
146.951	SEE SUMMARY	\$3,691.41

DETACH HERE

KEEP

Invoice: 50028378 Amount Due: \$3,691.41
PS ID: 292150701 60378

Please Choose One Form of Payment **SEND**
Emissions Non-Tide V [50002] - Emissions Tide V [50004]

Account: 0000421698

- Check Made Payable to DEQ
- Money Order Made Payable to DEQ
- Electronic Payment: * Date of Transfer: _____
Chase; Routing #103000648 Account #10020052
- * Please Notify DEQ Accounts Receivable:
Fax 405-702-7120 or email: deqEFNotification@DEQ.OK.GOV

- Purchase Order No.: [Redacted]
- Visa or MasterCard: [Redacted] Exp (mm/yy) [Redacted] DEQ Use Only

Card Number: [Redacted] Authorized Signature and Phone # [Redacted]

STATE OF OKLAHOMA - 2013 REPORTED EMISSIONS (SEE INSTRUCTIONS ON REVERSE)

TONS OF REGULATED AIR POLLUTANT						
	HAP	NOX	PM-10	SOX	TOX	VOC
	5.537	111.316	1.333	0.058	0.000	28.707

DUPLICATE

Other Inventory Reporting Programs

Other Inventory Reporting Programs

- Refer to the “Helpful Resources” document in your packet for information on:
 - Greenhouse Gas Reporting Program (GHGRP)
 - Emergency Planning & Community Right-To-Know Act of 1986 (EPCRA)
 - Tier II Reporting
 - Toxics Release Inventory (TRI)

Greenhouse Gas Reporting

- Federal requirement - **DEQ is not involved** in the implementation or reporting of the Greenhouse Gas Inventory
- EPA Greenhouse Gas Reporting Program
<http://www.epa.gov/ghgreporting/reporters/>
- Resources Available Include:
 - Applicability Tool
 - Electronic Greenhouse Gas Reporting Tool (e-GGRT)

TIER 2 REPORTING REQUIREMENTS

- Established as Section 312 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)
- Applies to ALL substances with an MSDS
- On the premises at or above the “threshold” for any 24-hour period or more
- “Threshold” amount for reporting is either:
 - Extremely Hazardous Substances; 500 lbs.
 - All other MSDS materials; 10,000 lbs.

TOXICS RELEASE INVENTORY

- TRI, Section 313 of SARA Title III (EPCRA) Annual reporting program that produces a database on the releases, transfers, treatment, and reuse of over 650 toxic chemicals from more than 20,000 facilities nationwide
- It was designed to increase awareness of toxics within communities and provide data for public use, including emergency planning.

TRI REPORTING REQUIREMENTS

Three criteria for TRI reporting:

- 1) Facilities operating under covered NAICS Codes
- 2) Facilities with ten or more full time employees or the equivalent of 20,000 employee hours over a calendar year

TRI REPORTING REQUIREMENTS

3) Facilities which manufacture, process, or otherwise use any of over 650 specified chemicals or chemical groups at or above the thresholds over a calendar year.

- Manufacture or process - 25,000 lbs/year
- Otherwise use (not part of final product)- 10,000 pounds/year
- Any activity for Persistent, Bioaccumulative, and Toxic chemicals: reporting threshold is 0.1 grams to 100 pounds/year

EPCRA Contacts & Assistance

www.deq.state.ok.us/LPDnew/saratitleiii

Call or e-mail for assistance

Clifton Hoyle (Manager, Risk Management Section)

405-702-5215 clifton.hoyle@deq.ok.gov

Jami Murphy (TRI)

405-702-1011 jami.murphy@deq.ok.gov

Tom Bergman (TIER II and CAMEO)

405-702-1013 tom.bergman@deq.ok.gov

Jim Carter (TIER II invoices)

405-702-1015 Jimmy.carter@deq.ok.gov

Matt Wormus (GIS)

405-702-5137 Matthew.wormus@deq.ok.gov

In Your Folder: Helpful Resources

Helpful Resources

- **DEQ**
 - **DEQ Contacts**
 - Who to contact for over 300 possible inquires:
<http://www.deq.state.ok.us/mainlinks/contacts.htm>
 - **Environmental Complaints Reporting Hotline (24/7)** 800-522-0206
 - **Air Quality General Inquiries** 405-702-4100
 - **Air Quality Permitting** 405-702-4100 ask for Permitting
 - Information on applicability determinations, obtaining/modifying/cancelling a permit, new regulations affecting permitting
 - **Air Quality Compliance and Enforcement** 405-702-4100
 - Information on inspections, stack testing, excess emissions and other notifications
 - For specific contacts or industry types, see this web page:
<http://www.deq.state.ok.us/aqdnew/ComplianceEnforcement/Contact.htm>
 - **Air Quality Emissions Inventory** 405-702-4100 or aei@deq.ok.gov
 - Information on Annual Emissions Inventory reporting, changing Responsible Official, and Annual Operating Fees
 - General Instructions, SCC's, and Oklahoma Regulated Air Pollutants help:
<http://www.deq.state.ok.us/aqdnew/emissions/>
 - WebFire - EPA's online database that contains emission factors:
<http://cfpub.epa.gov/webfire/>
 - For specific contacts, see this web page:
<http://www.deq.state.ok.us/aqdnew/emissions/EIcontact.htm>

Please Complete Before You Leave

Air Quality Workshop Questionnaire

Please take a moment to offer suggestions to help us improve our workshops in the future.

- Did you find the expanded workshop subjects helpful to you?

- Do you have any suggestion on ways to improve the workshop?

- Are there any topics not included in our workshop that would be beneficial?