



Air Quality Division
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CY 2015 Emissions Reporting Updates and Guidance

Following our practice last year, we are providing information here about key aspects of the CY2015 reporting season in advance of the annual workshop. If you have specific questions or need any further information, please contact us or ask us at the workshop. We look forward to seeing you there.

Air Quality Workshop (Previously Emissions Inventory Workshop) – This year our free, annual workshop has been expanded to a full day and, as well as advice and guidance on completing your emissions inventory, it will now include presentations from the AQD Permitting and Compliance & Enforcement Groups. These groups will specifically discuss the permit application process and how to stay in compliance with the Oklahoma Air Pollution Control Rules. The workshops will be held in Norman on January 21, 2016 and at a new venue in Tulsa on February 4, 2016.

Permit by Rule (PBR) – All new PBR facilities registered after December 31, 2014 must submit a 2015 emissions inventory. (2015 inventories for PBR facilities that reported in 2014 will not be required.) Subsequently, inventories for PBR facilities will next be required for 2017 if actual emissions >5 tons per year (TPY) of any regulated air pollutant, or 2020 if actual emissions <5 TPY of any regulated air pollutant. PBR facilities will be first invoiced for Annual Operating Fees in 2016 based on calendar year 2014 activity and then on the most recently reported annual inventory thereafter. Companies can choose to submit an annual inventory for a PBR facility even if an inventory is not required. However, if a company chooses to do so, they must contact us so that we can load that facility into Redbud.

Volatile Organic Compound (VOC) Emissions – Beginning with the 2014 emissions inventory, VOC reporting guidance was adjusted from previous years. VOC emission factors and emission amounts must now be reported as Total VOC instead of non-HAP VOC. This matches up with how we must report VOC to the EPA National Emissions Inventory. A Hazardous Air Pollutant (HAP) that is also a VOC should still be calculated and reported separately if emissions of that HAP are above the lower reporting cut-off. A large percentage of our QC correspondence with companies this past year was to address situations where the Total VOC emission amount reported was derived using outdated guidance. Also, please review your calculation methods for deriving Total VOC emission amounts and report your speciated HAPs as appropriate, exercising caution where a Total VOC emission factor explicitly excludes an individual HAP due to test method limits.

Chromium – Because of the importance of identifying Hexavalent Chromium emissions we have added specific categories for different types of Chromium emissions. These should be used where possible instead of the general “Chromium and Chromium Compounds” category.

Lower Reporting Cut-off – Our guidance remains that emissions of 0.1 tons or greater of any regulated air pollutant at a process must be reported. Key exceptions must still be reported at 0.001 tons or greater per process:

- Lead, Mercury & Hexavalent Chromium
- Any HAP at a facility that is also reported to the TRI
- Any HAP from glycol dehydration still vents
- Any HAP from large storage tanks (>500 BBL)
- Other situations where deemed necessary

Removal of Emission Records Below the Lower Reporting Cut-off – Many HAP, Particulate Matter, and SO₂ records have been removed from the major external and internal combustion processes where emission amounts, based on design capacity and installed controls, would be less than 0.1 tons per year in normal operation. Please contact us to discuss the removal of any other records in Redbud that do not need to remain in the inventory per the guidance above.

Changes to Redbud – There are limited changes to Redbud this year. Problems with Internet Explorer compatibility view should be resolved. The Final Submission process has been improved to provide an additional screen to clearly confirm that your inventory has been submitted.

Operating Fees – Invoices for the 2016 Annual Operating Fee (based on 2014 reported emissions) will be mailed on July 1, 2016. The fee for minor facilities is fixed at \$25.12 per ton of emissions of regulated air pollutant, and the fee for Title V facilities will be \$37.02 per ton.

Direct Reporting – The submission of electronic data tables in lieu of data entry in Redbud is an option that may be available to large companies with 100 or more similar facilities. This option requires demonstration of significant technical expertise and a strong commitment from the company Responsible Official that the company will submit accurate data on an accelerated timescale. Please call Mark Gibbs, Emission Inventory Section Manager at (405) 702-4179 to discuss whether this option may be suitable for your company.