



Air Quality Division
Emission Inventory Section
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CY 2014 Emissions Reporting Updates and Guidance

Our free, annual workshop, to be held in Norman on January 22, 2015 and in Tulsa on February 3, 2015, is primarily aimed at those completing an emissions inventory for the first time. We are providing this information about key aspects of CY2014 reporting in advance of the workshop so that experienced reporters can decide whether they wish to attend. If you have questions or need further information, please contact us.

Permit by Rule (PBR) – All PBR facilities registered by December 31, 2014 must submit a 2014 emissions inventory. Subsequently, inventories for these facilities will be required on a three-year or six-year cycle depending on the amount of emissions released. 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.

Volatile Organic Compound (VOC) Emissions – Beginning with the 2014 emissions inventory, VOC emission factors and emission amounts should be reported as Total VOC. A Hazardous Air Pollutant (HAP) that is also a VOC should still be calculated and reported separately as in the past. This change should eliminate the confusion that can arise when determining the amount of non-HAP VOC emissions. However, per the Oklahoma Clean Air Act, HAP emissions will not be double-charged for in the Annual Operating Fee.

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.

Trace Box – The trace checkbox will remain as an option for those who still wish to report that emissions of a regulated pollutant from a process have been estimated to be less than 0.001 tons (2 pounds) per year.

API Well Numbers – The API numbers for oil and gas wellhead facilities will be required in the 2014 inventory since they are crucial to accurately apportioning point and area emissions. Where this data has already been reported to the DEQ, such as in PBR permit applications or OOOO notifications, it will be prepopulated in Redbud. API numbers should be entered or revised using the facility notes section on the facility page in Redbud.

Pneumatic Controllers – Emissions from these devices at oil and gas facilities have been the focus of considerable research and discussion in the last year in Oklahoma and elsewhere. Based on reports provided by the Oklahoma Independent Petroleum Association and the Gas Processors Association, DEQ will not be requiring pneumatic controllers to be reported as part of annual point source inventories from either production or midstream facilities at this time.

Control Devices & Practices – In response to the EPA's new reporting requirements, the DEQ has made substantial changes to the list of valid controls. 85 selections have been retired and eight new control types have been added. We have replaced invalid control selections, so please review your control records to verify that any new assignments are correct.

Internet Explorer Compatibility View – Customers using IE 10 or 11 to view Redbud may experience issues such as: seeing numbers in fields that should display text; fields that are cut off and not displaying all of the data; or problems saving work. Our new IE Compatibility Help Page, http://www.deq.state.ok.us/aqdnew/emissions/redbud_iecompatibility.htm, shows how to fix these issues.

Changes to Redbud – There are very few changes to Redbud this year. We are currently working on the capability to generate Final Submission Turn Around Documents for individual facilities.

Operating Fees – Invoices for the 2015 Annual Operating Fee (based on 2013 reported emissions) will be mailed on July 1, 2015. 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 is expected to be \$36.95 per ton.

If you have questions or need further information, please contact the DEQ Emission Inventory section at (405) 702-4100 or aei@deq.ok.gov.