Air Quality Virtual Workshop

January 2022

Kendal Stegmann
Air Quality Division Director



Air Quality Virtual Workshop

- Welcome to the first Air Quality Workshop in 6 years!
 - Emissions Inventory holds an annual workshop, but it has been a while since all sections were involved.
 - We are excited to bring you updates from across Air Quality!





Today's Agenda

•	8:30-8:35	Introduction-Kendal Stegmann
•	8:35-9:25	Federal Rule Updates-Madison Miller
		Break
•	9:35-9:50	New Permitting Rules-Anne Smith
•	9:50-9:55	E-Permitting Retirement-Lee Warden
•	9:55-10:05	New Oil and Gas General Permit-Phillip Fielder
•	10:05-10:35	Tanks Tool Demo and Updates-Joseph Wills/Junru Wang
		Break
•	10:45-11:00	Compliance Monitoring Strategy-Preston Loving
•	11:00-11:20	DEQ Interpretation of "Annual" for the Purposes of NSPS and NESHAP-Rick Groshong
•	11:20-12:00	Emissions Inventory Updates and Reminders-Carrie Schroeder



Remember Air Quality Rules Always Apply

https://www.deq.ok.gov/asd/rules-and-regulations/



The work must go on...

- DEQ has adapted to the ongoing impacts of the COVID-19 pandemic
- DEQ has embraced new technologies that allow us to continue to do our work
- DEQ is meeting its statutory requirements to EPA, and has continued its goal of protecting human health and the environment in Oklahoma



On with the Show!

- Thanks for coming!
- Please contact us at any time with further questions
 - https://www.deq.ok.gov/deq-contacts/
- Now, over to our moderator, Christina, for some brief insights before we get into the presentations





FEDERAL RULE UPDATES

MADISON MILLER
SUPERVISING ATTORNEY, AIR QUALITY DIVISION
JANUARY 25, 2022

HOT TOPICS

- O&NG Methane
- GHGs from Power Plants
- Startup Shutdown Malfunction
- Regional Haze
- NAAQS
- Air Quality Council Rulemakings



O&NG METHANE PROPOSED RULE

- Proposed Nov. 15, 2021
- 86 Fed. Reg. 63110
- Comment period ends Jan. 31, 2022
- Big Take Aways –
- CRA joint resolution reinstates certain regs in NSPS OOOO and OOOOa
- OOOOb and OOOOc text forthcoming
- Potential for big increase in universe of facilities affected https://www.epa.gov/system/files/documents/2021-07/qa_cra_for_2020_oil_and_gas_policy_rule.6.30.2021.pdf

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 60

[EPA-HQ-OAR-2021-0317; FRL-8510-02-OAR]

RIN 2060-AV16

Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review

AGENCY: Environmental Protection

Agency (EPA).

ACTION: Proposed rule.

GREENHOUSE GASES FROM POWER PLANTS (111d)

• PROCEDURAL HISTORY:

- August 2015 Clean Power Plan (CPP) 80 Fed. Reg. 64662 (Oct. 23, 2015)
- February 2016 SCOTUS stayed CPP (West Virginia et al v. EPA, 577 U.S. 1126)
- June 2019 Affordable Clean Energy Rule (ACE) (repeal of CPP) 84 Fed. Reg. 32520 (July 8, 2019)
- February 2021 D.C. Circ. Vacated ACE and remanded to EPA (Am. Lung Assoc. v. EPA, 985 F.3d 914)
- February 12, 2021 EPA Memo stating status of ACE and CPP
- <u>TBD:</u>
- West Virginia v. EPA Oral arg. scheduled for Feb. 28, 2022 (appeal of Am. Lung at US Supreme Court)

STARTUP SHUTDOWN MALFUNCTION

- TIMELINE
- June 12, 2015 SSM SIP Call (80 Fed. Reg. 33840)
- EPA hold on SIPs at regional level
- Oct. 9, 2020 Inclusion of Provisions Governing SSM in SIPs
- Sept. 30, 2021 Withdrawal of Oct. 2020 Memo and Implementation of Prior Policy

REGIONAL HAZE

- Current Phase: Round 2 of Regional Haze Implementation
- Oklahoma's Draft Plan Status
- DEQ Regional Haze webpage: https://www.deq.ok.gov/airquality-division/air-qualityrules-planning/regionalhaze/



NATIONAL AMBIENT AIR QUALITY STANDARDS

- Particulate Matter (PM)
 - 12/18/2020 EPA retained current standards without revision for primary and secondary NAAQS
 - Fine particles (annual and 24-hour PM2.5)
 - Coarse particles (24-hour PM10)
 - 6/10/2021 EPA announces that it will reconsider 2020 decision to retain

		primary	1 year	12.0 µg/m ³	annual mean, averaged over 3 years
	5	secondary	1 year	15.0 μg/m ³	annual mean, averaged over 3 years
Particle Pollution (PM)	PM _{2.5}	primary and secondary	24 hours	35 µg/m³	98th percentile, averaged over 3 years
	PM ₁₀	primary and secondary	24 hours	150 μg/m ³	Not to be exceeded more than once per year on average over 3 years

NATIONAL AMBIENT AIR QUALITY STANDARDS

Ozone

- 12/23/2020 EPA decision to retain 2015 ozone standards (85 Fed. Reg. 87256)
- 10/29/2021 EPA announced it will reconsider 2020 decision to retain; evaluation to be completed by 2023
 - CASAC ad hoc panel being formed to review the science

Ozone (O ₃)	primary and 8 hou secondary	urs 0.070 pp	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years	
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AIR QUALITY ADVISORY COUNCIL

- January 19, 2022 Meeting
- OAC 252:100 Subchapters 1, 7, and 8 regarding construction activities prior to permit issuance
- OAC 252:100-47 Municipal Solid Waste Landfills
- Rules were approved by Council but are not final



SIGN UP TO RECEIVE AIR QUALITY UPDATES!

HTTPS://WWW.DEQ.OK.GOV/AIR-QUALITY-DIVISION/SIGN-UP-FOR-AIR-QUALITY-NOTIFICATIONS/



NEW PUBLIC NOTICE REQUIREMENTS FOR TIER I AIR QUALITY PERMITS



AIR QUALITY WORKSHOP

JANUARY 25, 2022

Anne Smith, P.E.

Permitting Section

Air Quality Division

Oklahoma Department of Environmental Quality

TODAY'S TOPICS

- Why these particular changes were made
- New public review requirements and permit processing options
- Which permits are affected by this change?
- Implementation

BACKGROUND

- The new public review requirements were implemented to bring ODEQ in line with EPA's public participation procedures.
 - Promulgated by the EPA in 40 CFR Part 51, Subpart I and 40 CFR Part 70
- Previously only Tier II and III permits were required to undergo a 30-day public review period.
 - Through applicants publishing newspaper notices
- Effective September 15, 2021, certain Tier I permits are required to undergo a 30-day public review period.
 - Through ODEQ's web-based noticing system

OVERVIEW

- What permits are affected?
 - Individual minor source construction and operating permits
 - Modifications to individual minor source construction and operating permits
 - Minor construction permit modifications to facilities operating under a major source operating permit
- Two New Source Review (NSR) processing options available
 - Traditional Processing
 - Enhanced Processing
- The applicant will have the option to choose between the NSR processing options in the construction permit application.

TRADITIONAL VS ENHANCED PROCESSING

Traditional Processing

- There are review periods for both the construction and operating permits.
 - The draft construction permit will undergo a 30-day public review period.
 - The subsequent draft operating permit will undergo another 30-day public review period and, for Title V operating permits, a 45-day EPA review period.
- Individual minor source operating permits that have gone through public review will be considered
 Federally Enforceable State Operating Permits (FESOPs) upon issuance.
- This is the only processing option for facilities that are not currently operating under a FESOP or a Title V operating permit.

TRADITIONAL VS ENHANCED PROCESSING

Enhanced Processing

- Enhanced processing can only be selected for facilities already operating under a FESOP or a Title V operating permit.
- There are review periods for only the construction permit modifications.
 - The draft construction permit modification will undergo a 30-day public review period and, for Title V facilities, a 45-day EPA review period.
 - The subsequent draft operating permit modification will not require further review prior to issuance.
- Modifications that have not been authorized in a construction permit will be required to go through Traditional Processing.

MINOR SOURCE PERMITS REVIEW PROCESS

Traditional NSR Processing	Public Review ?
All PBR – Construction	None
All PBR – Operating	None
All PBR – Construction & Operating Combined	None
All GP – Construction	None
All GP – Operating	None
Initial Construction Permit	30 day Public (Web)
Construction Permit Modification	30 day Public (Web)
Initial FESOPs	
FESOP Initial Operating Permit *	30 day Public (Web)
FESOP Modifications	
FESOP Modification (obtained Construction Permit Modification prior)	30 day Public (Web)
FESOP Modification (no Construction Permit Modification prior)	30 day Public (Web)
Enhanced NSR Processing (must obtain FESOP prior)	Public Review ?
Enhanced Construction Permit Modification	30 day Public (Web)
FESOP Modifications	
FESOP Modification (obtained Enhanced Construction Permit Modification prior)	None

^{*} Existing facilities, with operating permits issued prior to September 15, 2021, will be required to go through traditional processing to obtain a FESOP only when a facility action triggers a permit modification.

MAJOR SOURCE PERMITS REVIEW PROCESS

Traditional NSR Processing	Public and/or EPA Review?					
Initial Construction Permit	30 day Public					
Construction Permit Modification – Minor	30 day Public (Web)					
Construction Permit Modification – Significant	30 day Public					
Title V Operating Permits						
Initial Operating Permit	30 day Public & 45 day EPA					
Renewal Operating Permit	30 day Public & 45 day EPA					
Title V Operating Permit Modifications						
Operating Permit Modification – Minor	45 day EPA					
(obtained Construction Permit Modification prior)	43 day EFA					
Operating Permit Modification – Significant	30 day Public & 45 day EPA					
(obtained Construction Permit Modification prior)	50 day 1 done dt 15 day 217 t					
Operating Permit Modification – Minor	45 day EPA					
(no Construction Permit Modification prior)						
Operating Permit Modification – Significant	30 day Public & 45 day EPA					
(no Construction Permit Modification prior)	,					
Enhanced NSR Processing	Public and/or EPA Review?					
(must obtain Title V Operating Permit prior)						
Enhanced Construction Permit Modification – Minor	30 day Public (Web) & 45 day EPA					
Enhanced Construction Permit Modification – Significant	30 day Public & 45 day EPA					
Title V Operating Permit Modifications						
Operating Permit Modification – Minor or Significant	None					
(obtained Enhanced Construction Permit Modification prior)	140110					

SELECTING THE REVIEW PROCESS

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WEB-BASED PUBLIC REVIEW OVERVIEW

- Once the draft permit has been developed, ODEQ will post the draft permit on the Department's public review webpage. The posting will include the start and end dates for the 30-day public review period.
 - Permits open for public review: <u>www.deq.ok.gov/permits-for-public-review</u>
- ODEQ will e-mail a notification to interested parties that the draft permit has been made available for public review. The notification will provide the same information as the web posting.
 - Registration for e-mail notifications: www.deq.ok.gov/air-quality-division/sign-up-for-air-quality-notifications
- If any comments are received, ODEQ will respond and reply as appropriate. ODEQ will also provide the applicant with a copy of any comments received.

PERMITS OPEN FOR PUBLIC REVIEW

WWW.DEQ.OK.GOV/PERMITS-FOR-PUBLIC-REVIEW





ABOUT DEQ

PERMITS

RULES & REGULATIONS ENVIRONMENTA COMPLAINTS

DIVISIONS *

CONTACT

SEARCH Q

PERMITS FOR PUBLIC REVIEW

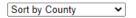
Below is a list of permits that may be open for public review. Please check the status column to see if it is available for public review. All other permits posted are for information purposes only. To view the actual permit click on the file link under the View Permit column.

NOTE: Email attachments are not available through the application below. Comment "documents" can be submitted via the e-mail links below or mailed to the respective division. Addresses are found on the divisional web page.

Air Quality Division: Phillip.Fielder@deq.ok.gov

Land Protection Division: Hillary.Young@deq.ok.gov

Water Quality Division: Gregory.Carr@deq.ok.gov



County	Start	End	Status	Company	Facility	Comment	Division	Permit Number	Latitude	Longitude	View Permit
BRYAN	11/12/2021		Open	Achille PWA	Achille PWA	Click to Leave Comment	WQD	OK0027979			Click to View
CANADIAN	12/9/2021	1/8/2022	Open	ENLINK MIDSTREAM SERVICES LLC	CANA GAS PLANT	Click to Leave Comment	AQD	2019-1156-TVR	35.535230	-98.096680	Click to View
CARTER	12/10/2021		Open	City of Healdton	City of Healdton	Click to Leave Comment	WQD	OK0027413			Click to View
CLEVELAND	11/24/2021	1/9/2022	Open	City of Norman	Transfer Station	Click to Leave Comment	LPD	3514007	35.176016	-97.447514	Click to View
COAL	12/29/2021	1/28/2022	Open	ENABLE GAS TRANSMISSION LLC	CHILES DOME STATION	Click to Leave Comment	AQD	2020-5058-TVR4	34.709860	-96.297780	Click to View
CREEK	9/10/2021		Open	Mounds PWA	Mounds PWA	Click to Leave Comment	WQD	OK0022888			Click to View
DELAWARE	6/19/2020		Open	Seneca Cayuga Nation	Seneca Cayuga Nation	Click to Leave Comment	WQD	OK0039098			Click to View
GRADY	11/30/2021	12/30/2021	Closed	ENABLE GAS GATHERING LLC	DUTTON COMPRESSOR STATION	Comment period closed	AQD	2020-5120-0			Click to View

TIER I PUBLIC NOTICE GUIDANCE DOCUMENT

WWW.DEQ.OK.GOV/AIR-QUALITY-DIVISION/AIR-PERMITS

















ABOUT DEQ

RULES & REGULATIONS **ENVIRONMENTAL** COMPLAINTS

CONTACT

SEARCH Q

AIR QUALITY DIVISION

AQD Contact Information AQD Contacts by Topic

Ambient Air Monitoring	>
Air Permits	>
Emissions Inventory	>
Air Compliance/Enforcement	>
Lead-Based Paint	
Rules & Planning	>
Forms & Public Participation	>

AIR PERMITS

- + Oil and Gas Facilities General Permit
- + Air Quality Workshop
- Tier I Public Notice Guidance

AQD has developed implementation guidance for permitting under the new Tier I public notice requirements, effective September 15, 2021.

+ Produced Water Update

AQD operates a dual permitting system — construction permits and operating permits — to control major and minor sources of air pollution.

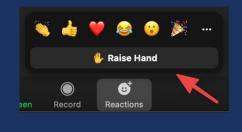
- . A construction permit application is required before a new source is constructed or an existing source is modified.
- · AQD issues the construction permit after it is determined the source is designed to meet applicable rules and pre-construction requirements.
- An operating permit is issued after construction is completed and demonstration is made that the source is canable of meeting applicable



QUESTIONS?







E- Permitting Retirement

Air Quality Workshop 2022

Lee Warden

Engineering Manager

Transition Period

- The ability to initiate new applications will end on February 1, 2022.
- New account requests will not be approved beginning February 1, 2022.
- Applicants will have continued use of the system to manage active applications and existing permits through April 1, 2022.
 - After this date, permits in process that have not been issued will be transferred to normal application processing.
 - Applicants using the system to store applications and permits will need to download documents prior to the April deadline or contact <u>AQEpermitHelp@deq.ok.gov</u> to make other arrangements.

Form link (email Richard and Phillip) at the bottom of the main Air Quality Permit Page:

https://www.deq.ok.gov/air-quality-division/air-permits/

Online Submittals

Contact the Air Permits Division

405-702-4100 (ask for Permitting Assistance)

Mailing Address

Email: Contact Richard Kienlen / Phillip Fielder

Go to our Contacts page for specific questions on air permit issues

CONTACT RICHARD KIENLEN AND PHILLIP FIELDER Name First Phone Email * Subject Message Drop files here or Select files Max. file size: 256 MB. SUBMIT

Payments

For Accounts Receivable

Phone: (405) 702-1130

Fax: (405) 702-7120

ARHelpdesk@deq.ok.gov

Questions



Air Quality Workshop

O&G General Permit Update

January 25, 2022

Phillip Fielder

Chief Engineer, AQD

Public Review and Comments

Initial Public Review

- Published August 17, 2020, for a 30-day public comment period
- Significant comment received and O&G GP updated
- As a result of significant changes, another round of public review conducted

Public Review - Second Round

- Published December 16, 2021, for a 30-day public comment period
- Comment period extended until February 1, 2022
- Draft memo/permit and supporting information available on website

- Incorporates Multiple CAP options
 - Class I means a facility that has an enforceable limit less than 80% of major source levels for each regulated pollutant
 - Class II means a facility that has an enforceable limit of less than 100% of major source levels for each regulated air pollutant and is not a Class I facility
 - Previous version only allowed for Class II option
 - Class I facilities have reduced inspection frequency and less likely to trigger level 1 violations

- Changed compliance from a Calendar limit to a 12-month rolling total to comply with EPA annual limit criteria
 - Significant comment received about potential burden
 - GP adjusted to allow recordkeeping of throughputs, fuel usage, and other supporting data to document compliance with a "base" set of calculations

- Emission factor Methodology Updated
 - Application updated and used to certify base emission factor
 - Emission factor documentation and other calculation methods required to be fully documented for permit record
 - Need to support full federal enforceability

- Engine testing updated
 - Allows for Semi-annual testing instead of quarterly
 - Provides for an exemption from testing for small engines

- Clarify that Maintenance, Startup, and Shutdown emissions (MSS) are part of the CAP
 - Added a section to address significant MSS activities and included emissions calculation criteria/options

- Control Device Updates
 - Includes a specified list of devices
 - Specifies an allowed control efficiency and associated monitoring requirements
 - Needed for full federal enforceability

- Incorporating New NSPS/NESHAP Standards
 - Old permit required facilities to get an individual construction permit when constructing, modifying, or reconstructing a piece of equipment or process subject to an NSPS/NESHAP standard not already incorporated into the permit
 - Proposed permit allows these changes to happen regardless of NSPS/NESHAP applicability. Facility would still need to comply with all other permit and NSPS/NESHAP notification, testing, and recordkeeping requirements, as applicable

Thank You

Questions



TANK EMISSIONS CALCULATIONS: WORKING AND BREATHING LOSSES

Oklahoma Department Of Environmental Quality

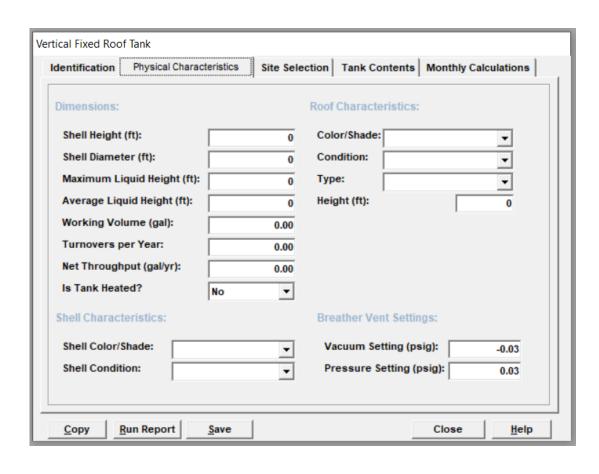
Air Quality Division

Permitting Group

UPDATED AP-42 SECTION 7.1: ORGANIC LIQUID STORAGE TANKS

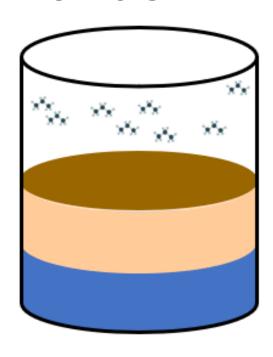
- Previous version dated November 2006.
- Updates began with release in November 2019.
- Minor revisions released in June 2020.
- Updates/revisions include:
 - Updates to previous guidance.
 - Additional guidance provide.

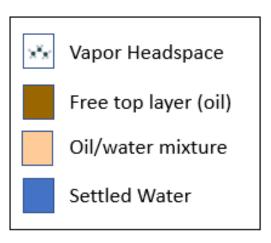
KEY CONCERNS (#1): SUPPORT OF EPA'S TANKS VERSION 4.09D



- EPA no longer supporting the software (2016).
- EPA is now discouraging further use of the software.
- See AP-42, Section 7.1.3.

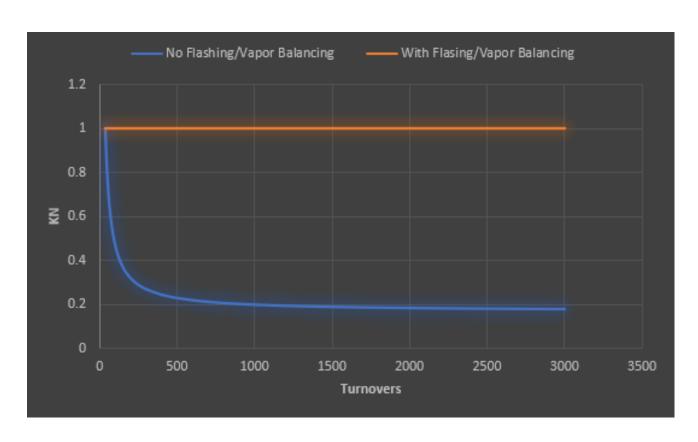
KEY CONCERNS (#2): PRODUCED WATER EMISSIONS - FIXED ROOF TANKS.





- EPA recommends modeling tank emissions based on
 - the free top layer.
- If there is any oil or condensate floating on top of the water, the tank should be modeled assuming:
 - Throughput of total liquids, and
 - Based on oil properties.
- See AP-42, Sections 7.1.3.1 & 7.1.4.

KEY CONCERNS (#3): FLASHING & VAPOR BALANCING CONSIDERATIONS



- The working loss production factor (K_N) should be set to one (1) if a tank:
 - Includes flashing emissions, or
 - Receives captured vapors from tank truck loading activities (vapor balancing).
- Increases the saturation of the tank vapor headspace.
- See AP-42, Section 7.1.3.1.2.

AQD PERMITTING POLICY MOVING FORWARD

- No longer accepting:
 - Emissions calculations using EPA's TANKS 4.09D.
 - Assumed percentage of oil in produced water (i.e., 1%, 5%, etc.).
- For applications received after April 9, 2020:
 - Only accepting calculations based on AP-42, Section 7.1 (06/2020).
- For applications received after April 15, 2021:
 - Produced water must be calculated as follows:
 - Properties should be based on 100% oil, and
 - Using total liquid throughput of tank.

ODEQ STORAGE TANK EMISSIONS CALCULATION TOOL

- Developed in response to EPA no longer supporting TANKS 4.09D.
- https://www.deq.ok.gov/air-quality-division/air-permits/storage-tankemissions-calculation-tool/
- Current Version (Released 10/22/2021):
 - Calculates working and breathing emissions for:
 - Vertical fixed roof tank emission calculations
 - Horizontal tanks emission calculations
 - Includes all guidance mentioned in this presentation.
 - Does not calculate tank flashing emissions or tank truck loading emissions.
- Future development is planned.

ODEQ STORAGE TANK EMISSIONS CALCULATION TOOL (CONTINUED)

- Demonstration
- Located at
 - https://www.deq.ok.gov/air-quality-division/air-permits/storage-tankemissions-calculation-tool/

COMPLIANCE MONITORING STRATEGY

Preston Loving

AQD Compliance Manager

Compliance Monitoring Strategy (CMS)

- EPA develops compliance monitoring strategies to ensure that regulated facilities across the country are evaluated for compliance on a regular basis.
- Compliance monitoring is one of the key components EPA/DEQ uses to ensure the regulated community obeys environmental laws and regulations.
- This encompasses all regulatory agency activities performed to determine whether a facility is in compliance with applicable state and federal environmental regulations.

The CMS establishes national goals of conducting a full CAA compliance evaluation at:

Title V (TV) facilities.
 (Once every two *fiscal years)

Title V Mega facilities.
 (Once every three *fiscal years)

Synthetic Minor 80 (SM-80) facilities.
 (Once every five *fiscal years)

*DEQ USES THE STATE FISCAL YEAR WHICH RUNS FROM JULY 1ST TO JUNE 30TH EACH YEAR.

DEQ reserves the right and has the authority to inspect any facility, regardless of source classification, within the state of Oklahoma. In addition to the source classifications listed above, these may include minor sources, SM<80 sources, and unpermitted sources.

TITLE V MAJOR SOURCES

Title V facilities, also known as major sources, are those sources with permitted emissions above the major source thresholds (MST).

The MSTs vary depending on the type of pollutant.

- Criteria air pollutants NO_x , CO, VOC, SO_2 , and PM are examples of criteria air pollutants. The MST for criteria pollutants is 100 tons per year (TPY).
- Hazardous Air Pollutants (HAPs), also known as toxic air pollutants or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects. There are currently 188 different compounds identified that are considered HAPs. The MST is 10 TPY for individual HAPs and 25 TPY for a combination/conglomerate of HAPs.
- Title V major sources are evaluated for compliance through a full compliance evaluation (FCE), at a minimum, once every two fiscal years. Some of these sources are evaluated annually due to their significance and/or complexity level.
- As of the 2022 CMS, there were 249 facilities permitted as major sources of air pollutants throughout the state of Oklahoma.

MEGA-SITE SOURCES

- Mega-sites are the largest facilities within the Title V major source universe.
 The number of these facilities is small.
 - There are currently five facilities in the state of Oklahoma DEQ has identified as mega-sites for the purposes of the air CMS.
- These facilities are evaluated for compliance through an FCE once every three fiscal years.
- Due to the complexity of these facilities, DEQ will conduct several partial compliance evaluations (PCEs) during this three-year period. The PCEs are then used in constructing the individual FCEs at the end of the three-year period.

SYNTHETIC MINOR 80 SOURCES

- Synthetic Minor 80 (SM-80) sources emit or have the potential to emit (PTE) at or above 80% of the Title V major source threshold.
 - For example:

If a facility has a PTE of 145 TPY of NOx, but the facility has installed a control mechanism to limit NOx emissions to 90 TPY, then the facility would be classified as a SM-80 source, since NOx emissions with controls are above 80% of the 100 TPY MST for NOx.

- SM-80 sources are evaluated for compliance through an FCE once every five fiscal years.
- As of the 2022 CMS, there were 1,687 facilities classified as SM-80 sources of air pollutants throughout the state of Oklahoma.

BY THE NUMBERS

- DEQ conducted the following number of FCEs during the last ten fiscal years:
 - FY 2022 315 facilities are targeted for an FCE.
 - FY 2021 300 FCEs
 - FY 2020 323 FCEs
 - FY 2019 382 FCEs
 - FY 2018 383 FCEs
 - FY 2017 410 FCEs
 - FY 2016 419 FCEs
 - FY 2015 408 FCEs
 - FY 2014 410 FCEs
 - FY 2013 376 FCEs

Clean Air Act CMS Policy

- If you would like to read more about the specifics of the EPA CMS policy, you can find it at the following link:
- https://www.epa.gov/compliance/clean-air-act-stationary-sourcecompliance-monitoring-strategy
- Or you can Google "EPA Clean Air Act Compliance Monitoring Strategy" and locate the document through this method.

QUESTIONS?

AIR QUALITY DIVISION CONTACT NUMBERS

Oklahoma City – 405-702-4100

Tulsa - 918-293-1600

DEQ Interpretation of "Annual" for the purposes of NSPS and NESHAP.

Rick Groshong - AQD Compliance and Enforcement Group Manager

Emissions Inventory Updates & Reminders

January 2022

Presented by Carrie Schroeder, Emissions Inventory Manager



Presentation Topics

- ▶ Meet the Section!
- ▶ Helpful Webpages
- ▶ Reminders
- ▶ New for 2021 Reporting
- Quality Control
- ▶ The Future



Contact Information

► Contact the Section: aei@deq.ok.gov 405-702-4100 No change in availability

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If you've never reported an emissions inventory, check out our training videos!

https://www.deq.ok.gov/air-quality-division/emissionsinventory/emissions-inventory-workshop/

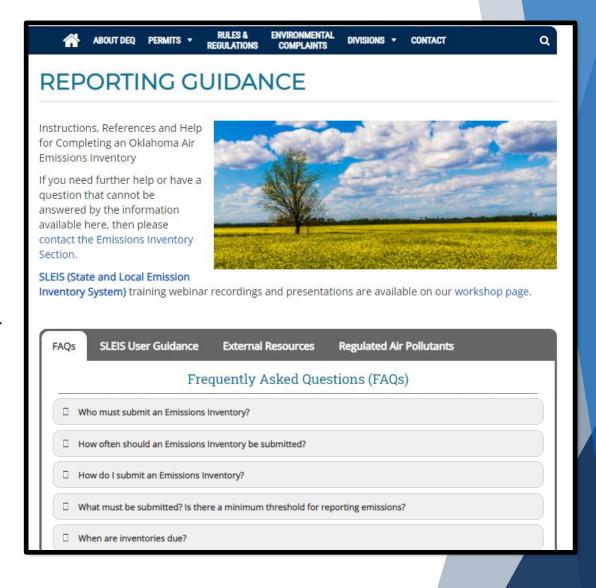
2019-21 Emissions Inventory Training Recordings

- 💆 SLEIS User Registration, Account Management & Report Preparation
- SLEIS User Interface
- SLEIS Template Use and Bulk Operations
- 2020 Emission Inventory Workshop Presentations (Slides)
- 2021 Emissions Inventory Workshop Presentations
 - Emission Inventory Updates (Slides)
 - Understanding the Calculation Features in SLEIS
 - SLEIS Data Validation & Quality Control (Slides)



Our Frequently Asked Questions page is a great resource too!

https://www.deq.ok.gov/air-qualitydivision/emissionsinventory/reporting-guidance/





You can access all Emissions Inventory training and guidance on the SLEIS homepage https://applications.deq.ok.gov/sleis/





Welcome

Please check the News to the right for the latest announcements from DEQ!

Welcome to the **Oklahoma** DEQ State and Local Emissions Inventory System (SLEIS), a web-based application that allows permitted facilities to compile and submit point source emissions inventory data. SLEIS replaces Redbud, OKDEQ's previous web-based emissions reporting application. Companies may submit inventory amendments through SLEIS at any time after notifying and receiving approval from OKDEQ.

Please Note

Minimum browser requirements for SLEIS are Chrome, Mozilla Firefox, or Microsoft Edge

Locked Accounts

SLEIS accounts will be locked after 5 unsuccessful attempts accessing SLEIS. Contact aei@deq.ok.gov or 405-702-4100 to reset your password

SLEIS User Registration

Accounts have been created for all existing Responsible Officials (RO) and Main Facility Contacts (MFC). Access the login page and choose "Forgot Password?". You will receive email instructions. New ROs should request a SLEIS user account by completing Form 100-882, Designation of Responsible Official/SLEIS User Registration Form. Other company representatives should complete Form 100-733, SLEIS User Registration Form. Mail or email the completed forms to the address indicated on the form. An email link to create your initial account password will be sent.

SLEIS Supporting Documentation

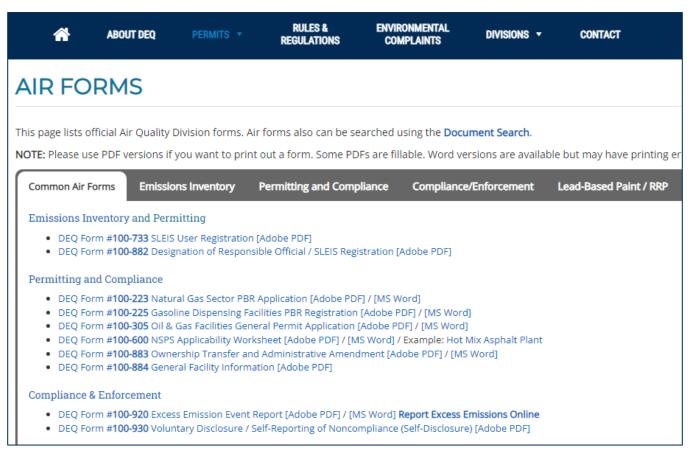
The following documents are provided as supporting materials that may be useful when reviewing an emissions inventory report.

- SLEIS Training Webinars
- SLEIS Facility Application Guide version 2.5
- SLEIS Code Tables (Excel Workbook)
- SLEIS File Import Specification (Batch/Bulk Import) version 2.6.1
- SLEIS File Import Specification (Report Homepage Import) version 2.6.1
- Regulated Air Pollutants (RAPs)
- Emissions Inventory Frequently Asked Questions (FAQs)
- External Resources including NAICS, SIC, SCC and AP-42 Emission Factor searchable databases
- Guide to Determining Oil and Gas Facility Categories
- . Tips on reporting Flares, Tanks, and Glycol Dehydrators in SLEIS



All Air Quality forms can be found here!

https://www.deq.ok.gov/air-quality-division/forms-publicparticipation/air-forms/





Important Dates

- ► Annual report "stubs" are created in SLEIS by January 1
- ► Emission inventory reports due April 1
- ▶ Deadline with approved 30-day extension May 1
- ► Invoices mailed July 1
- ➤ Operating Fees due July 31; Fees are subject to 1.5% per month penalty 30 days after due date
- ► Facility transfers are due 30 days from transfer





Annual Operating Fees

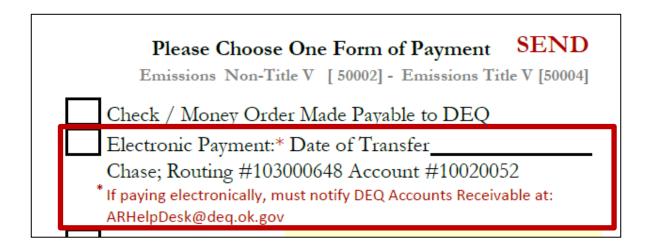
- ▶ Two years in arrears
 - 2021 inventories submitted by April 1, 2022 billed in 2023
 - This allows the Emission Inventory Section ample time for quality control
- ► The Title V operating fee was set at \$32.30 per ton in 2008, and it is adjusted yearly based on the change in the annual Consumer Price Index
 - The 2022 Title V fee is \$42.50 per ton
- ▶ The minor source fee is fixed at \$25.12 per ton

https://www.deq.ok.gov/air-quality-division/emissions-inventory/emissions-inventory-operating-fees/



Annual Operating Fees

- ► Companies paying their operating fees with an **electronic payment** must notify DEQ Accounts Receivable at <u>ARHelpDesk@deq.ok.gov</u> and provide
 - ► Invoice number, amount sent, date sent
- ► Electronic payments are placed in a state account and DEQ must request the payment be credited to DEQ. If there is no notice, DEQ is unaware of the payment and can't post payment to your company account.
- ▶ If we don't show a payment, our office will call you.





2021 Permit by Rule (PBR) Facilities

- ▶ PBR facilities do not need to report in 2021, unless the facility registered under the PBR in 2021 or the facility reported Not Yet Built (NYB) in 2020.
- ▶ DEQ still needs to know about ownership changes. Submit Form 100-883 for a change of ownership.
- ► Submit permit termination requests for closed, permit exempt, or de minimis facilities. Remember, permitted PBR facilities are still required to pay operating fees annually.







SLEIS User Review

Change of Company Personnel or Consultants

- ► Users with the Administrator role can remove other users from their company accounts
 - Please review annually and update/remove SLEIS users that no longer need access
 - Contact DEQ to request those users' accounts be deactivated
- Submit paperwork to add new individuals
 - Form 100-882 for a new RO/Submitter
 - Form 100-733 for anyone else



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."



#100-883 Administrative Change Notification (Transfer of Ownership)

https://www.deq.ok.gov/air-quality-division/forms-public-participation/air-forms/

AIR QUALITY DIVISION ADMINISTRATIVE CHANGE NOTIFICATION Request for Transfer and Administrative Amendment of Permit				Air Quality Di 707 N Robinso	Oklaho ma Dept. Of Environmental Quality Air Quality Division 707 N Robinson, Suite 4100, P.O. Box 1677 Oklaho ma City, Oklahoma 73101-1677		
FACILITY INFORMATI	ON						
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	<u> </u>	Zip		
INFORMATION UPDAT		VIOUS/CURRENT ((Transferor))	NEW (Tr	ansferee)	
Facility Name	[Listed Above]		e]				
Company Name (Owner/Operator) Headquarters Mailing Address City							
State							
Zip							
Responsible Official (Name	e)						
Title							
Phone							
Fax							
Email Address							
Technical Contact (Name	e)						
Title							
Phone							
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Change of Ownership - Facility still in SLEIS

- DO NOT update the facility status to temporarily or permanently shut down if you do not own the facility any longer to reduce your reporting burden. DEQ needs accurate information.
 - Remember you are certifying your inventory as correct
- Submit DEQ Form 100-883
- If you do not have any communication from DEQ about the transfer, call us to verify we have received the form
- Share operational data with new company if you operated the facility part of the year to achieve the most accurate figures



Ownership & Annual Operating Fee Liability

► Change of ownership - New owners assume liability for payment of the annual operating fees based on emissions reported in years of operation prior to transfer of ownership. (However, purchase contracts can shift the liability to the previous owner.)



Amend Previously Submitted Emission Inventories

- SLEIS is always available to view historical reports
- ► You can request to amend a prior report
 - ► Log in, navigate to that facility, navigate to that annual report and request to amend on the right-hand side of the screen
 - ▶ Be sure to give an explanation



SLEIS Reminders & Updates

State and Local Emissions Inventory System



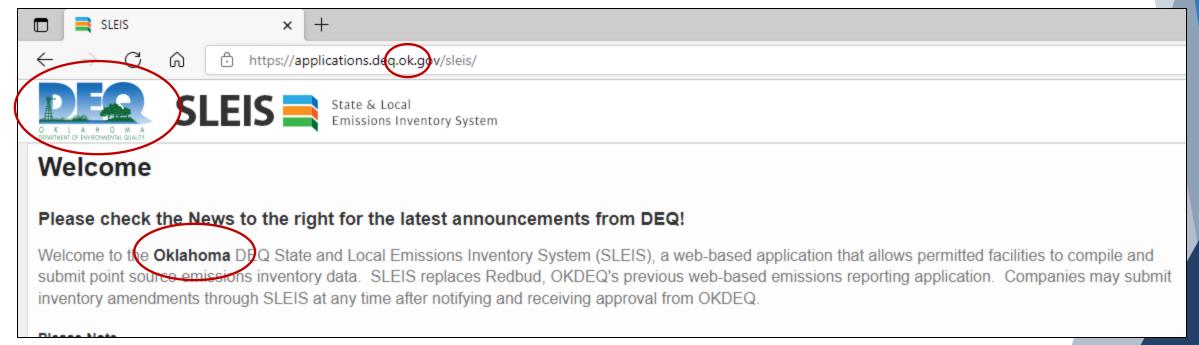
Welcome

Welcome to the Oklahoma State and Local Emissions Inventory System (SLEIS), a web-based application that allows permitted facilities to compile and submit point source emissions inventory data in accordance with regulatory reporting.



2021 SLEIS Reminders

► SLEIS Login problems - Confirm you are on Oklahoma's SLEIS home page. Several other states use SLEIS for emission inventory reporting. Oklahoma's SLEIS homepage can be found: https://applications.deq.ok.gov/sleis/





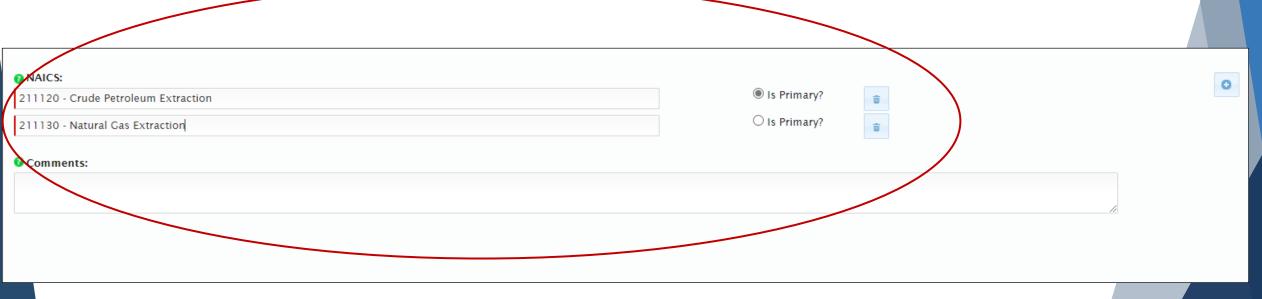
2021 Reporting Changes

- ► NAICS (North American Industry Classification System) Code
- ► Status Dates → Year
- ► Last/Final Emissions Year → Process Operating Status and Year
- ► Release Point Types
- ► Calculating produced water emissions



2021 SLEIS Improvements - #1

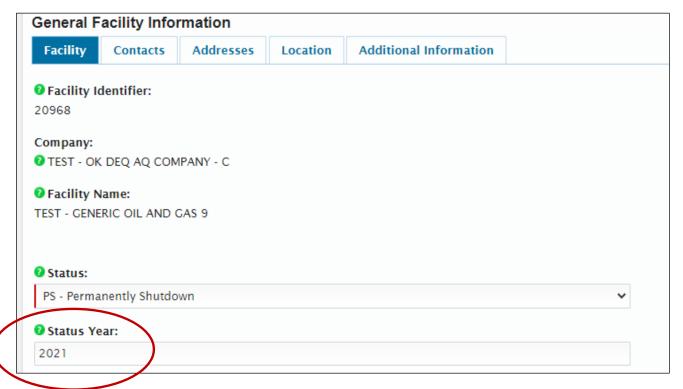
- ▶ Now, more than 1 NAICS code may be entered for the facility
- ► Select which code is the primary code





2021 SLEIS Improvements - #2

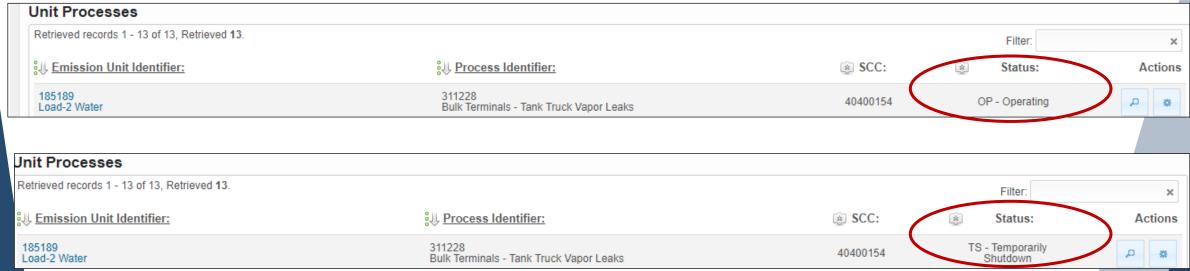
- ► Status calendar dates (month & day) changed to Status Year
 - ▶ This is at all levels facility, emission unit, release point, control device
 - ► Status Changes to Permanently or Temporarily Shutdown require a Year to be entered; Month and Day are no longer required.
 - ▶ No status date is required for operating facilities or equipment





2021 SLEIS Improvement - #3

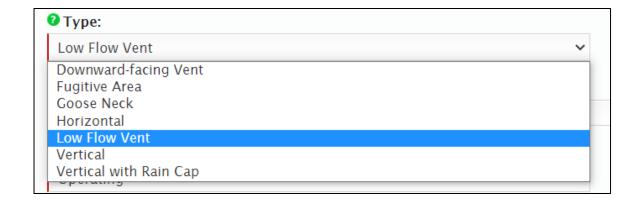
- ▶ Unit Processes used to have a "Last/Final Emissions Year" field. That has been replaced with an Operating Status field and Status Year field
 - ► This matches up with the rest of SLEIS
 - ▶ We prepopulated these values for you
 - ► Year field required if status is not Operating





2021 Reporting Update - #4

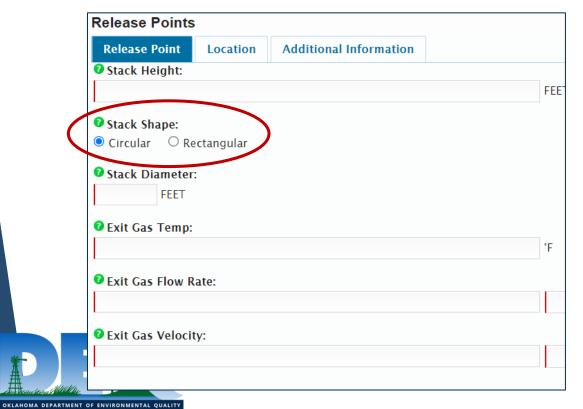
- ► New release point type: Low Flow Vent
 - ▶Same requirements as other non-fugitive release points





2021 SLEIS Improvement - #4

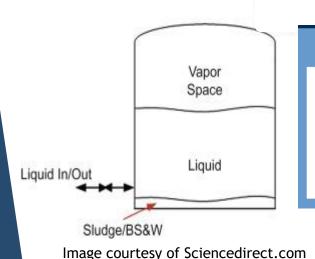
- New release point stack shape: Rectangular
- ► SLEIS users can report rectangular-shaped release points. Release points will need one of the following:
 - ► For circular stacks, report Stack Diameter
 - ► For rectangular stacks, report Stack Opening Length and Stack Opening Width





2021 Reporting Update - #5

▶ Produced Water emissions reporting in SLEIS - It is no longer appropriate to use 1% of oil for produced water working and breathing emissions. Use full water + oil volume. The saturation of organic components in the vapor head space are based on the properties of the free top layer (oil), and not the water.



Produced Water Considerations

For tanks storing produced water and condensate/oil, DEQ will now require all applications submitted on or after April 15, 2021, to calculate breathing and working emissions assuming 100% of the tank throughput to be based on the properties of the condensate/oil which forms the free top layer. This requirement is in consideration of EPA guidance in AP-42, Section 7.1 (06/20), Subsection 7.1.3.1.

DEQ will no longer accept breathing and working emission calculations which are based on a condensate/oil-to-water ratio. This guidance does not apply to produced water tank flashing emissions or produced water tank truck loadout emissions. You may submit alternative emissions calculations for working and breathing losses with a technical justification and supporting documentation for a case-by-case approval.



Quality Control (QC)



One of our biggest QC issues on last year's inventories was dealing with inconsistent statuses



Status Options

- ► Operating operated for any part of the calendar year
- ► Temporarily Shutdown
- Permanently Shutdown
- ► Not Yet Built (Facility-level only)









Temporarily vs. Permanently Shutdown Facility



Description:







- Facility was idle or did not operate for the entire year;
- Permit still active and facility may restart at any time;
- All "lower" data elements must have status of temporarily or permanently shutdown.

- Facility did not operate the entire year and will no longer operate;
- Permit has been Cancelled;
- There will be no more inventory reports after this one
- All "lower" data elements must have a status of permanently shutdown



Steps for changing a facility to Temporarily or Permanently Shutdown

- 1. Change Facility status to Temporarily/Permanently Shutdown & enter status year.
 - Validation error will occur if a year is not entered into the Year field.
 - ► There currently is no QA check on the Year field so if there is a value in it already, be sure to update it.
- 2. Change <u>in consecutive order</u>: release points, control devices, emission units, & unit processes.
 - Enter/update each status year.
 - Validation error will occur if a year is not entered into the Status Year field.













Temporarily vs. Permanently Shutdown Equipment



Description:







Release Point



Control Device



Emission Unit



Unit Processes

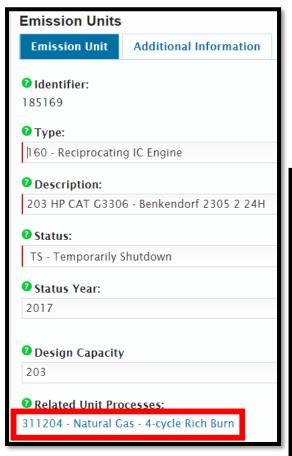
- Did not operate at all during calendar year;
- But may restart at some time in the future.

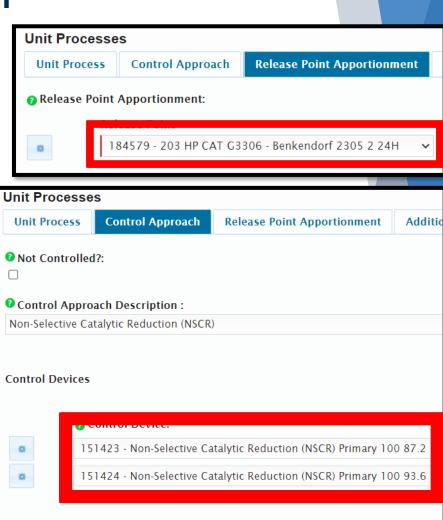
- Did not operate at all during calendar year;
- Has been removed or permanently shutdown;
- Will be dropped from the following inventory year.



Steps for Changing Equipment to Temporarily and Permanently Shutdown

- ► Find the associated records
 - Related Unit Process to find the Unit Process
 - ► Release Point Apportionment to find the Release Point
 - ► Control Approach to find the Control Device
- Update each Status and Status Year

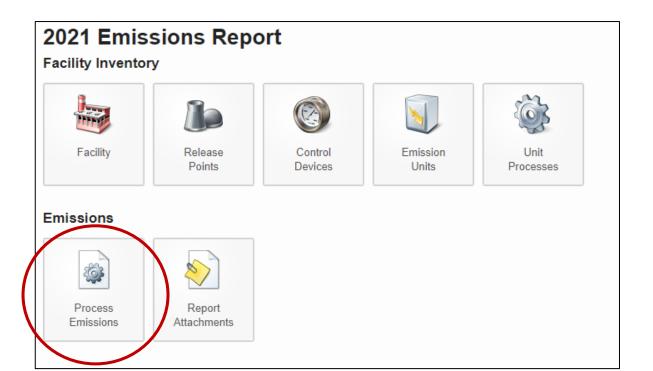






Statuses - Do Not Do This

- ► Currently, you cannot use the template files to update statuses. Also, you must update statuses prior to downloading the templates.
- ▶ It is NOT acceptable to report zero throughput and zero emissions in lieu of updating statuses. When the statuses are updated properly, the Process Emissions will not show that process(es).





Heads Up - 2022 Reporting Change



Addition of 1-bromopropane to HAP list

- ➤ On 12/22/21, the EPA Administrator signed a notice adding 1-bromopropane (1-BP, also called n-propylbromide) to the Clean Air Act's list of hazardous air pollutants (HAPs, also known as air toxics). The effective date is February 4, 2022.
- ► This is the first time that EPA has added a pollutant to the list of hazardous air pollutants since Congress created the list through the 1990 Clean Air Act amendments.
- ► The chemical 1-BP is used in dry cleaning, solvent degreasing, adhesives, furniture foam fabrication, and in other applications including the aerospace industry.
- ▶ DEQ expects that 1-BP emissions will be collected in the 2022 emissions inventories.

Future of SLEIS

- ▶ DEQ is the recipient of an EPA grant for SLEIS improvements
- ► Enhancements planned after this reporting season:
 - Bulk operation to assist agency users in processing reports
 - Copy and Paste facility inventory elements within and between facilities
 - Clearer SLEIS launch page branding (between states)
 - Total emissions by facility report for multiple facilities
 - Streamlined process for closed facilities to verify that they want to terminate their air permits
 - Increased QA/QC





