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/](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

GREENHOUSE GASES FROM POWER PLANTS (111d)

- PROCEDURAL HISTORY:
  - 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

- TBD:
  - 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
REGIONAL HAZE

• Current Phase: Round 2 of Regional Haze Implementation
• Oklahoma’s Draft Plan Status
• DEQ Regional Haze webpage: https://www.deq.ok.gov/air-quality-division/air-quality-rules-planning/regional-haze/
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

<table>
<thead>
<tr>
<th>Particle Pollution (PM)</th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM_{2.5}</td>
<td>primary</td>
<td>1 year</td>
<td>12.0 μg/m^3</td>
</tr>
<tr>
<td></td>
<td>secondary</td>
<td>1 year</td>
<td>15.0 μg/m^3</td>
</tr>
<tr>
<td></td>
<td>primary and secondary</td>
<td>24 hours</td>
<td>35 μg/m^3</td>
</tr>
<tr>
<td>PM_{10}</td>
<td>primary and secondary</td>
<td>24 hours</td>
<td>150 μg/m^3</td>
</tr>
</tbody>
</table>
NATIONAL AMBIENT AIR QUALITY STANDARDS

- **Ozone**
  - 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 secondary | 8 hours | 0.070 ppm (3) | Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years |
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
New Public Notice Requirements for Tier I Air Quality Permits

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
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.
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

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Public Review?</th>
</tr>
</thead>
<tbody>
<tr>
<td>All PBR – Construction</td>
<td>None</td>
</tr>
<tr>
<td>All PBR – Operating</td>
<td>None</td>
</tr>
<tr>
<td>All PBR – Construction &amp; Operating</td>
<td>None</td>
</tr>
<tr>
<td>All GP – Construction</td>
<td>None</td>
</tr>
<tr>
<td>All GP – Operating</td>
<td>None</td>
</tr>
<tr>
<td>Initial Construction Permit</td>
<td>30 day Public (Web)</td>
</tr>
<tr>
<td>Construction Permit Modification</td>
<td>30 day Public (Web)</td>
</tr>
</tbody>
</table>

#### Initial FESOPs

- **FESOP Initial Operating Permit**: 30 day Public (Web)
- **FESOP Modifications**
  - (obtained Construction Permit Modification prior): 30 day Public (Web)
  - (no Construction Permit Modification prior): 30 day Public (Web)

#### Enhanced NSR Processing

- **Enhanced Construction Permit Modification**: 30 day Public (Web)
- **FESOP Modifications**
  - (obtained Enhanced Construction Permit Modification prior): None

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*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

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Public and/or EPA Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Construction Permit</td>
<td>30 day Public</td>
</tr>
<tr>
<td>Construction Permit Modification – Minor</td>
<td>30 day Public (Web)</td>
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<tr>
<td>Construction Permit Modification – Significant</td>
<td>30 day Public</td>
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</tbody>
</table>

#### Title V Operating Permits

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Public and/or EPA Review</th>
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</thead>
<tbody>
<tr>
<td>Initial Operating Permit</td>
<td>30 day Public &amp; 45 day EPA</td>
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<tr>
<td>Renewal Operating Permit</td>
<td>30 day Public &amp; 45 day EPA</td>
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#### Title V Operating Permit Modifications

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<th>Permit Type</th>
<th>Public and/or EPA Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operating Permit Modification – Minor</td>
<td>45 day EPA</td>
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<tr>
<td>(obtained Construction Permit Modification prior)</td>
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<tr>
<td>Operating Permit Modification – Significant</td>
<td>30 day Public &amp; 45 day EPA</td>
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<tr>
<td>(obtained Construction Permit Modification prior)</td>
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<tr>
<td>Operating Permit Modification – Minor</td>
<td>45 day EPA</td>
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<tr>
<td>(no Construction Permit Modification prior)</td>
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<tr>
<td>Operating Permit Modification – Significant</td>
<td>30 day Public &amp; 45 day EPA</td>
</tr>
<tr>
<td>(no Construction Permit Modification prior)</td>
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</tbody>
</table>

#### Enhanced NSR Processing

( must obtain Title V Operating Permit prior )

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Public and/or EPA Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enhanced Construction Permit Modification – Minor</td>
<td>30 day Public (Web) &amp; 45 day EPA</td>
</tr>
<tr>
<td>Enhanced Construction Permit Modification – Significant</td>
<td>30 day Public &amp; 45 day EPA</td>
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#### Enhanced Construction Permit Modification – Minor

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Public and/or EPA Review</th>
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<tbody>
<tr>
<td>Enhanced Construction Permit Modification – Significant</td>
<td>30 day Public &amp; 45 day EPA</td>
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#### Title V Operating Permit Modifications

<table>
<thead>
<tr>
<th>Permit Type</th>
<th>Public and/or EPA Review</th>
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<tbody>
<tr>
<td>Operating Permit Modification – Minor or Significant</td>
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<tr>
<td>(obtained Enhanced Construction Permit Modification prior)</td>
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SELECTING THE REVIEW PROCESS

<table>
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<tr>
<th>AIR QUALITY PERMIT APPLICATION</th>
<th>APPLICATION NUMBER</th>
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<tbody>
<tr>
<td>GENERAL FACILITY INFORMATION</td>
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</tr>
</tbody>
</table>

1. COMPANY INFORMATION
- Name: 
- Mailing Address: 
- City: 
- State: 
- Zip: 

2. APPLICATION TYPE
- Applicability Determination: 
- Construction Permit: 
- Operating Permit: 
- GP Authorization To Operate: 
- GP Authorization To Construct: 
- GP Name: 
- Renewal: 
- Modification: 
- Relocation: 
- PDR: 
- PBR: 

3. IN CONFIDENTIAL INFORMATION INCLUDED?
- YES
- NO

4. TIER CLASSIFICATION
- Tier I
- Tier II
- Tier III
- N/A – AD only

5. FEES SUBMITTED
- $ 
- Check # 
- Date

JANUARY 25, 2022
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: www.deq.ok.gov/permits-for-public-review

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 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

<table>
<thead>
<tr>
<th>County</th>
<th>Start</th>
<th>End</th>
<th>Status</th>
<th>Company</th>
<th>Facility</th>
<th>Comment</th>
<th>Division</th>
<th>Permit Number</th>
<th>Latitude</th>
<th>Longitude</th>
<th>View Permit</th>
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<tbody>
<tr>
<td>BRYAN</td>
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<td>1/8/2022</td>
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<td>Achillea PWA</td>
<td>Achillea PWA</td>
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<td>WQD</td>
<td>OK0027979</td>
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<tr>
<td>CANADIAN</td>
<td>12/9/2021</td>
<td>1/8/2022</td>
<td>Open</td>
<td>ENLINK MIDSTREAM SERVICES LLC</td>
<td>CANA GAS PLANT</td>
<td>Click to Leave Comment</td>
<td>AQD</td>
<td>2019-1156-TVR</td>
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<td></td>
<td>Click to View</td>
</tr>
<tr>
<td>CARTER</td>
<td>12/10/2021</td>
<td>City of Healdton</td>
<td>Open</td>
<td>City of Healdton</td>
<td>Click to Leave Comment</td>
<td>WQD</td>
<td>OK0027413</td>
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</tr>
<tr>
<td>CLEVELAND</td>
<td>11/24/2021</td>
<td>1/9/2022</td>
<td>Open</td>
<td>City of Norman</td>
<td>Transfer Station</td>
<td>Click to Leave Comment</td>
<td>LPD</td>
<td>3514007</td>
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</tr>
<tr>
<td>COAL</td>
<td>12/29/2021</td>
<td>1/28/2022</td>
<td>Open</td>
<td>ENABLE GAS TRANSMISSION LLC</td>
<td>CHILES DOME STATION</td>
<td>Click to Leave Comment</td>
<td>AQD</td>
<td>2020-5058-TVR</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>CREEK</td>
<td>9/10/2021</td>
<td>Mounds PWA</td>
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<td>Mounds PWA</td>
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<td>WQD</td>
<td>OK0022868</td>
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<tr>
<td>DELAWARE</td>
<td>6/19/2020</td>
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<td>Seneca Cayuga Nation</td>
<td>Seneca Cayuga Nation</td>
<td>Click to Leave Comment</td>
<td>WQD</td>
<td>OK0039098</td>
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<td></td>
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<tr>
<td>GRADDY</td>
<td>11/30/2021</td>
<td>12/30/2021</td>
<td>Closed</td>
<td>ENABLE GAS GATHERING LLC</td>
<td>DUTTON COMPRESSOR STATION</td>
<td>Comment period closed</td>
<td>AQD</td>
<td>2020-5120-O</td>
<td></td>
<td></td>
<td>Click to View</td>
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New Public Notice Requirements for Tier I Air Quality Permits

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

AOD 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.
- AOD 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 capable of meeting applicable...
QUESTIONS?

PLEASE BE SURE TO RAISE YOUR HAND.
E- Permitting Retirement

Air Quality Workshop 2022
Lee Warden
Engineering Manager
• 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 AQEpermitHelp@deq.ok.gov 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/

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
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
Significant Changes

- 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
Significant Changes

- 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
Significant Changes

- 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
Significant Changes

- 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
Significant Changes

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

- 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
UPDATED AP-42 SECTION 7.1: ORGANIC LIQUID STORAGE TANKS

- Previous version dated November 2006.
- Updates began with release in November 2019.
- Updates/revisions include:
  - Updates to previous guidance.
  - Additional guidance provided.
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-tank-emissions-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-tank-emissions-calculation-tool/
COMPLIANCE MONITORING STRATEGY

Preston Loving
AQB 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 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\textsubscript{x}, CO, VOC, SO\textsubscript{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.
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
If you would like to read more about the specifics of the EPA CMS policy, you can find it at the following link:


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

Emissions Inventory Manager:
  o Carrie Schroeder      Carrie.Schroeder@deq.ok.gov

Emissions Inventory Staff:
  o Michelle Horn         Michelle.Horn@deq.ok.gov
  o Michael Ketcham       Michael.Ketcham@deq.ok.gov
  o Grant Loney           Grant.Loney@deq.ok.gov
  o Shandee Ratliff       Shandee.Ratliff@deq.ok.gov
  o Landon Stout          Landon.Stout@deq.ok.gov
If you’ve never reported an emissions inventory, check out our training videos!

https://www.deq.ok.gov/air-quality-division/emissions-inventory/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-quality-division/emissions-inventory/reporting-guidance/
You can access all Emissions Inventory training and guidance on the SLEIS homepage https://applications.deq.ok.gov/sleis/
All Air Quality forms can be found here!

https://www.deq.ok.gov/air-quality-division/forms-public-participation/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 ARHelpDesk@deq.ok.gov 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/
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/](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
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
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.

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

<table>
<thead>
<tr>
<th>Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Facility" /></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Temporarily Closed</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Facility was idle or did not operate for the <strong>entire year</strong>;</td>
</tr>
<tr>
<td>• Permit still active and facility may restart at any time;</td>
</tr>
<tr>
<td>• All “lower” data elements must have status of temporarily or permanently shutdown.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permanently Closed</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Facility did not operate the entire year and will no longer operate;</td>
</tr>
<tr>
<td>• Permit has been Cancelled;</td>
</tr>
<tr>
<td>• There will be no more inventory reports after this one;</td>
</tr>
<tr>
<td>• All “lower” data elements must have a status of permanently shutdown</td>
</tr>
</tbody>
</table>
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 in consecutive order: 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

<table>
<thead>
<tr>
<th>Description:</th>
<th>Temporarily Shut Down</th>
<th>Permanently Shut Down</th>
</tr>
</thead>
<tbody>
<tr>
<td>Release Point</td>
<td>- Did not operate at all during calendar year;</td>
<td>- Did not operate at all during calendar year;</td>
</tr>
<tr>
<td>Control Device</td>
<td>- But may restart at some time in the future.</td>
<td>- Has been removed or permanently shutdown;</td>
</tr>
<tr>
<td>Emission Unit</td>
<td></td>
<td>- Will be dropped from the following inventory year.</td>
</tr>
<tr>
<td>Unit Processes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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