## Emissions Inventory Updates

January 2021

Presented by Carrie Schroeder, Emissions Inventory Manager



#### **Contact Information**

- ► Contact the Section: aei@deq.ok.gov 405-702-4100
- **►** Emissions Inventory Manager:
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#### Presentation Questions, Comments, Reviews

Access our online workshop comment form at: <a href="https://www.deq.ok.gov/air-quality-division/emissions-inventory-workshop/">https://www.deq.ok.gov/air-quality-division/emissions-inventory-workshop/</a>

▶ Please include your name, affiliation and contact information.



# Remember Air Quality Rules Always Apply

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



#### **Presentation Topics**

- ► Review emissions inventory basics
- ► Other air programs
- ► New SLEIS features/reporting updates



## Emissions Inventory Review





#### What is an Emissions Inventory?

- ► A report of actual emissions of regulated pollutants during the previous year
- ▶ Provides a description to DEQ of your facility and its operations





#### Who Is Required to File an Inventory?

- ► The owner or operator of any facility that is a source of Regulated Air Pollutants (RAP)
- ► Facilities with Individual Permits, or registered under a General Permit
- ► All facilities registered under a Permit by Rule are required to report a 2020 inventory.
- "Special Inventories" upon request by AQD Director
- ► Exception: Permit Exempt & De Minimis facilities are not required to file an inventory



#### 2020 Permit by Rule (PBR) Facilities

- ► Review your list of PBR facilities in SLEIS early in the reporting season to verify operating status and ownership changes. Submit required form for change of ownerships.
- ➤ Submit permit termination requests for closed, permit exempt, or de minimis facilities. This prevents the need for our office to contact you.
- ► Temporarily shut down facilities retain their permits; an inventory is still required for 2020 change facility and equipment status to Temporarily Shutdown.







#### **Annual Operating Fees**

- ▶ Two years in arrears
  - 2020 inventories submitted by April 1, 2021 billed in 2022
  - 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 2021 Title V fee is \$40.38 per ton
- ▶ The minor source fee is fixed at \$25.12 per ton



#### **Operating Fees Continued**

- ▶ Pollutants are not double billed
  - We split your reported Total VOC into HAP and non-HAP VOC for billing
  - We only bill for PM-10. (PM-2.5 is a subset of PM-10)

TONS OF REGULATED AIR POLLUTANTS							
TOTAL BILLABLE	NOX	SOX	PM-10	НАР	тох	voc	OTHER*
7.185	3.020	0.033	0.394	0.022	0.000	3.716	0.000

 When calculating PBR annual operating fees, the last reported inventory emission amounts are used



#### Operating Fee Update

- ► To align with EPA and continually rising operational costs, we updated our operating fee billing practices for TV facilities that:
  - amend inventories that have already been invoiced, or
  - report inventories late that would have already been invoiced if reported on time
- ► Title V fees due to late or amended inventories will be accessed at the current year Title V rate.
  - For example, if a TV facility submitted an amendment to a 2017 inventory in January 2021, then the increase in emissions will be billed at the 2021 TV rate. Since we bill 2 years in arrears, the original invoice would have been paid in 2019 and based on the 2019 TV rate. Only the *additional* emissions will be re-invoiced, and they will be billed at the current rate, instead of the previously used rate.
  - Another example, if a TV facility failed to submit their 2017 inventory on time, and ended up submitting it in March 2021, then they would be billed at the 2021 rate (instead of the 2019 rate) for all of their emissions.



#### Operating Fee Update Continued

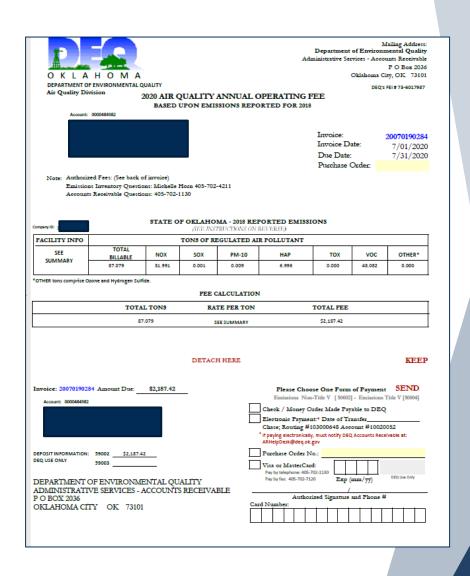
- ► This update does not affect minor sources because the minor source fee is a set fee (\$25.12 per ton) that does not change with the Consumer Price Index.
- ▶ Our billing threshold of 5 tons (or 5+ tons increase) company-wide has not changed. An amendment must exceed the billing threshold to receive another invoice.

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



#### Invoice

- Invoices are sent out July 1st
- Payment due July 31st
- Vital to have correct <u>Responsible Official</u> information
- Form 100-882 must be signed and submitted to update the Responsible Official





#### #100-882 Designation of Responsible Official

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

O K L A H O M A DEPARTMENT OF ENVIRONMENTAL QUALITY		100-882 Designation of Responsible Official/SLEIS Registration Oklahoma Department of Environmental Quality, Air Quality Division, P.O. Box 1677, Oklahoma City, OK 73101-1677 (405) 702-4100 (Tel), (405) 702-4101 (Fax)					
Please		pleted forms to the Air Quality Division of					
All SLEIS User Registrations Require a Responsible Official Signature  Section 1: Responsible Official (RO) Registration							
RO Name		tial (NO) Negistration					
RO Address							
City			Phone/Extension				
			Cell Phone				
State, Zip							
RO Email (required)			Fax				
Section 2: Respondance Viewer. The Editor		cial SLEIS Role Selection – All ROs a onal.	are assigned as Subm	nitter, Administrator, and			
Submitter – Can initiate submission process							
Assigned	Adminis	Administrator – Can remove or change a user's role (assigned to same company)					
	Viewer	Viewer – Can view the contents of a report, but cannot make any data modifications					
Optional	Editor -	Can view, start, modify, enter a report	(facility inventory and	emissions data)			
An RO can be associ	ated with a	<b>cility Information</b> – An RO can be associal the facilities at a company or only a prociated facilities below, or attach a list of	ortion of facilities at a	company. Check the all			
Company Name(s)							
	Assign F	RO to all facilities at the Company(s)					
Facility Name(s)							
Section 4: Certification – I certify that I am a Responsible Official for the above-listed facility(s) meeting the definition of OAC 252:100-1-3.							

You can have multiple ROs on file!



#### **SLEIS User Review**

#### Change of Company Personnel or Consultants

- ► The SLEIS administrator has the ability to remove SLEIS account holders from their company accounts
  - Please review annually and update/remove SLEIS account holders that no longer need access
  - Contact DEQ to request those users' accounts be deactivated
- Submit paperwork to add new individuals





#### #100-733 SLEIS User Registration

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

O K L A H O M A DEPARTMENT OF ENVIRONMENTAL QUALITY			100-733 SLEIS User Registration Oklahoma Department of Environmental Quality, Air Quality Division, P.O. Box 1677, Oklahoma City, OK 73101-1677 (405) 702-4100 (Tel), (405) 702-4101 (Fax)					
	Please mail completed forms to the Air Quality Division office or email to aei@deq.ok.gov							
Section 1:	SLEIS	S User Registr	ration					
Name								
Contact			are the primary facility contact for		ry issues			
Contact		Check if you	are a consultant or contractor for	the facility(s)				
Address								
City				Phone/Extension				
State, Zip				Cell phone				
Email (requ	ired)			Title				
Section 2: Administra			ion – Choose either Editor or View	er. Consultants and	d contractors cannot choose the			
Optional		Administrato	or – Can remove or change a user's	role (assigned to sa	ame company)			
Check one		Editor – Can	view, start, modify, and edit a rep	ort (facility inventor	ry and emissions data)			
check one		Viewer – Can view the contents of a report, but cannot make any data modifications						
facilities. A	SLEIS	user can be as	acility Information – A SLEIS use ssociated with all the facilities at a c x, list your associated facilities belo	company or only a p	ortion of facilities at a company.			
Company Name(s)								
	Assign SLEIS user to all facilities at the Company(s)							
Facility Name(s)								
			SLEIS User Registration forms re e Official for the above-listed facility		•			

To update the Main Facility Contact, add a consultant, or add an additional SLEIS user submit form 100-733



Date

#### 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."



#### Ownership & Annual Operating Fee Liability

- ► Change of ownership New owners assume liability for payment of the annual operating fees based on emission reported in years of operation prior to transfer of ownership. (However, purchase contracts can shift the liability to the previous owner.)
- ► To change the ownership of a facility, submit Form 100-883.



# #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 CHANCE NOTIFICATION Request for Transfer and Administrative Amendment of Permit				Oklahoma Dept. Of Environmental Quality Air Quality Division 707 N Robinson, Suite 4100, P.O. Box 1677 Oklahoma City, Oklahoma 73101-1677		
FACILITY INFORMATI	ION					
Facility Name (Current)						
Operating Permit No.						
Legal Description	Section	To	wnship		Range	
Latitude (to 3 Decimals)			Longit	tude (to 3 Decimals)		
UTM coordinates	Horizontal	Ve	ertical		Zone	
Physical Address or Driving Directions						
City or Nearest Town		C	County		Zip	
	M FRE	[Listed Above]	iansieroi,	,	NEW (I	ramsteree)
INFORMATION ITE Facility Name Company Name (Owner/Operator)	M PRE	VIOUS/CURRENT (T	ransferor)	)	NEW (T	ransferee)
Headquarters Mailing Address City						
State						
Zip						
Responsible Official (Name	e)					
Title						
Phone						
Fax						
Email Address						
Technical Contact (Nam	ie)					
Title						
Phone						
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## Invoicing Transferred Facilities

\*\*Ensure your facility transfer form is sent in by the 30 day deadline so that your invoice shows the correct list of facilities\*\*



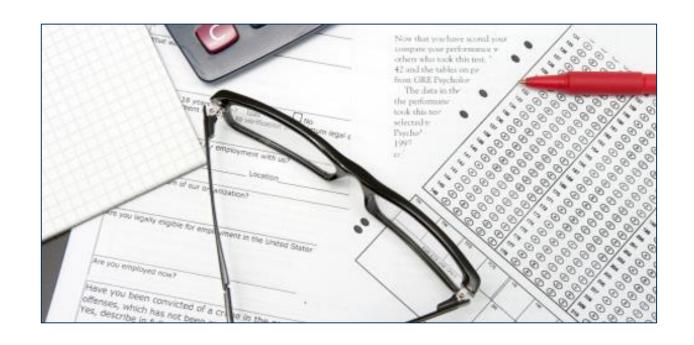
## Wrap Up of Important Dates



- ► 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
- ► Facility transfers are due 30 days from transfer



## Other Air Programs





#### Tier II Reporting

https://www.deq.ok.gov/land-protection-division/chemical-reporting-andpreparedness/tier-ii/tier-ii-reporting/

- Emergency Planning and Community Right-to-Know Act (EPCRA)
- ► Established to help communities plan for potential chemical emergencies
- ► Administered by DEQ Land Protection Division: Due on March 1

of each year

▶ Information: 405-702-5100





#### Toxics Release Inventory (TRI) Program

https://www.epa.gov/toxics-release-inventory-tri-program
https://www.epa.gov/toxics-release-inventory-tri-program/tri-threshold-screeningtool

► The TRI is a resource for learning about toxic chemical releases and pollution activities reported by industrial and federal facilities





#### Greenhouse Gas Reporting

- ► GHGRP is a Federal requirement
- ▶ DEQ is not involved in the implementation or reporting of the Greenhouse Gas Inventory
- ► EPA Greenhouse Gas Reporting Program
- ► EPA Greenhouse Gas Applicability Tool
- ► EPA Electronic Greenhouse Gas Reporting Tool (e-GGRT)

https://www.epa.gov/ghgreporting





## New SLEIS Features

## 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 Improvements

- 1. Source Classification Code (code only) added as an information field on the template file Processes.csv (single and batch)
- 2. Facility emission totals added to each facility's Copy of Record
- 3. Amendments can be initiated by a company or DEQ
- 4. The single/batch upload file names can be renamed and uploaded without causing an input error



► Process Source Classification Code (SCC) added as an information field on the template file Processes.csv (single and batch)

^		_	,	_	'	, , , , , , , , , , , , , , , , , , ,	- "	'
EmissionUnitId	ProcessId	ProcessSCC	sReporte	IsConfide	Throughp	Throughp	Throughp	Throughpu
185190	31122	31000404	TRUE	FALSE	10.22	E6FT3	I	209
185191	311280	40400154	FALSE	FALSE				1
185192	3112 <mark>3</mark> 1	40400300	ALSE	FALSE				1
185192	3112 <mark>32</mark>	40400301	TRUE	FALSE	20000	E3GAL	E	868
185192	3112 <mark>3</mark> 3	40400302	ALSE	FALSE				f
185193	311234	40400315	FALSE	FALSE				1
185194	31123	31000220	FALSE	FALSE				1

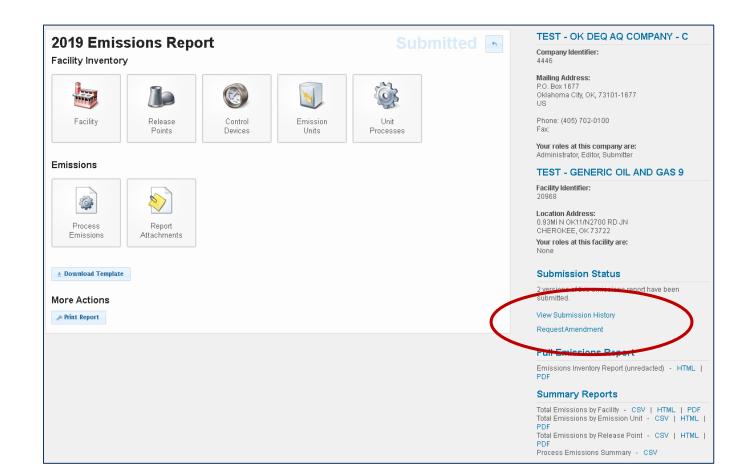


► Facility emission totals added to each facility's Copy of Record (also known as your emissions inventory report)

2019 Emissions Inventory Report TEST - OK DEQ AQ COMPANY - C (4446)						
	Emissions Summary for TEST - GENERIC OI	•				
CRITERIA AIR POLLUTAN	IT (CAP) EMISSIONS TOTALS					
Pollutant Code/CAS#	Pollutant Name		Total Emissions (tons)*			
CO	Carbon Monoxide		4.629			
PM10-PRI	PM-10 (All Particulate Matter <10 microns)		0.039			
VOC	Total VOC		360.028			
HAZARDOUS AIR POLLU	TANT (HAP) and/or OTHER POLLUTANT EMISSIONS TOTALS					
Pollutant Code/CAS#	Pollutant Name	Is VOC/PM?	Total Emissions (tons)*			
71432	Benzene (HAP-TOX)	VOC	2.5			
50000	Formaldehyde (HAP-TOX)	VOC	0.003			
*Rounded to 3 digits past the decimal point. Note that where rounding results in 0, < 001 is indicated.						

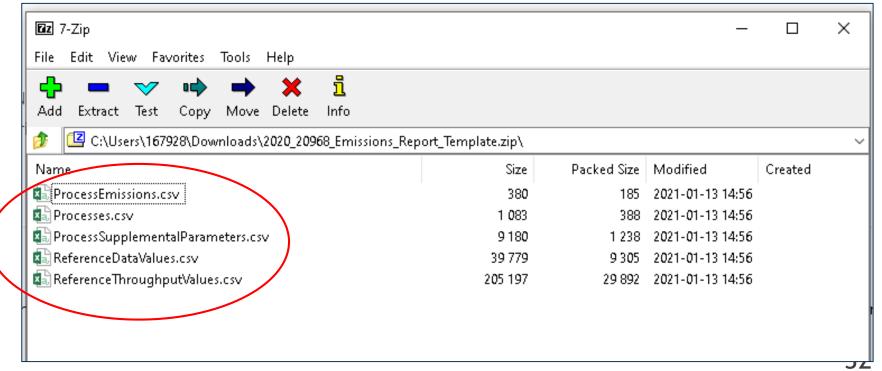


- ► The company has the ability to request to amend an inventory (no change)
- ▶ Now DEQ can also initiate an amendment for a facility





- ► Template file names can be changed. SLEIS will be looking at the fields inside the file to determine which file it is. Example:
  - Previously: Processes.csv
  - Now: 2020ABCFacilityProcesses.csv





## Other Reporting Updates



#### Reporting Updates - Tanks

- ▶ EPA's Tanks 4.09D is no longer approved for calculating tank emissions.
- ▶ Effective April 9, 2020, DEQ requests that applicants follow the updated calculation method provided in EPA's AP-42 Chapter 7, Section 7.1- Organic Liquid Storage Tanks and discontinue use of TANKS 4.09d for permit application submissions. The new AP-42 method corrects errors for more accurate emissions estimates. The EPA webpage links to the final version of AP-42 Chapter 7, Section 7.1, a revision summary, a redline version highlighting (draft) changes, and responses to public comments.
  - Starting with the 2020 inventories, companies are required to follow the updated calculation method



#### Reporting Updates - Tanks

▶ DEQ has developed a new Storage Tank Emissions Calculation Tool for fixed roof and horizontal tanks. The tool is available online and downloadable for offline use. Floating roof tanks, landing, and cleaning calculations will be addressed in a future release.

#### Tool:

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

• Sign up for Air Permits mailing list to receive further updates: <a href="https://www.deq.ok.gov/air-quality-division/sign-up-for-air-quality-notifications/">https://www.deq.ok.gov/air-quality-division/sign-up-for-air-quality-notifications/</a>

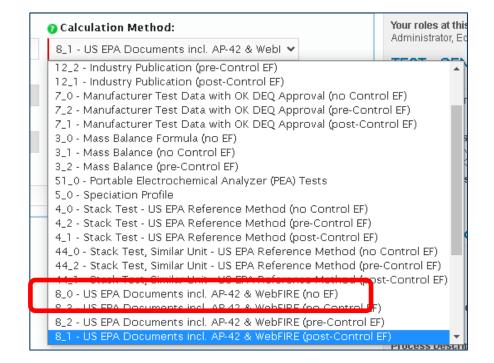


#### Reporting Updates - Tanks

▶ 2019 reports are the last time EPA Tanks software can be used as the emissions calculation method

► 2020 reporting needs to utilize the AP-42 updates and select "8\_0 - US EPA Documents incl. AP-42 & WebFIRE (no EF)" emissions calculation

method

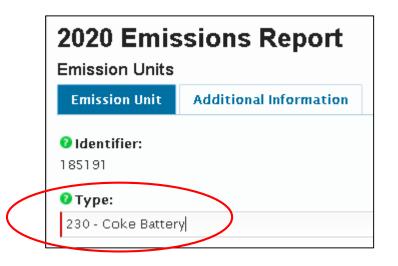




#### Reporting Updates - Emission Unit Type

► "Coke Battery" was added as an Emission Unit Type. It was previously omitted in oversight.







#### Reporting Updates - PM Metals

- ▶ Particulate Matter (PM) metal emission totals should be speciated (reported as a metal emission) and also be included in the appropriate PM amount (PM-10 primary or PM-2.5 primary). PM-10 primary/PM-2.5 primary permit factors normally include the metal emissions.
  - DEQ will be checking that this is being done!



► Many pollutant names were updated to align with rules/regulations. Here are some examples:

Pollutant Code	New 2021 SLEIS Pollutant Description	Previous SLEIS Pollutant Description
VOC	Volatile Organic Compounds (VOCs)	Total VOC
7664939	Sulfuric acid (including acid mist expressed as H2SO4)	Sulfuric acid
SO2	Sulfur Oxides (SOx) expressed as SO2	Sulfur Oxides - SOx
PM25-PRI	PM 2.5 - Primary (Filterable + Condensible)	PM-2.5 (All Particulate Matter <2.5 microns)
PM10-PRI	PM 10 - Primary (Filterable + Condensible)	PM-10 (All Particulate Matter <10 microns)
NOX	Nitrogen Oxides (NOx) expressed as NO2	Nitrogen Oxides - NOx
7664393	Hydrogen fluoride (Hydrofluoric acid)	Hydrogen fluoride
7647010	Hydrochloric acid	Hydrogen chloride
71432	Benzene (including benzene from gasoline)	Benzene

► Hazardous air pollutant "DDE" - one of our reporters asked us about DDE's CAS number (also used as the pollutant code) last year and we worked with EPA to get it corrected on their HAP list and in data sets.

Old (Incorrect) Pollutant Code	Pollutant Code - Description
72559	DDE
New Pollutant Code	Pollutant Code - Description
New Pollutant Code	Poliutant Code - Description
3547044	DDE



Pollutant Code	Pollutant Code - Description
OKDEQ5215	Dioxins/furans (non-HAP)

► "Dioxins/furans (non-HAP)" was retired because the regulated air pollutants list in the Rules reference NSPS: tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans. Emissions of this type should be reported under these pollutants:

Pollutant Code	Pollutant Code - Description
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin
123911	1,4-Dioxane (1,4-Diethyleneoxide)
VOC	Volatile Organic Compounds (VOCs)
PM25-PRI	PM 2.5 - Primary (Filterable + Condensible)
PM10-PRI	PM 10 - Primary (Filterable + Condensible)
250	Polycyclic Organic Matter
132649	Dibenzofuran

Pollutant Code	Pollutant Code - Description
OKDEQ5216	Fluorides (non-HAP)

► "Fluorides (non-HAP)" was retired because it is covered by these pollutants:

Pollutant Code	Pollutant Code - Description
7664393	Hydrogen fluoride (Hydrofluoric acid)
1582098	Trifluralin
VOC	Volatile Organic Compounds (VOCs)
PM25-PRI	PM 2.5 - Primary (Filterable + Condensible)
PM10-PRI	PM 10 - Primary (Filterable + Condensible)
16984488	Fluorine expressed as Fluoride, F-



New pollutant!

➤ We added "Total Reduced Sulfur (TRS) expressed as Sulfur" as a pollutant because it is on our regulated air pollutants list in our Rules.

Pollutant Code	Pollutant Code - Description
OKDEQ5822	Total Reduced Sulfur (TRS) expressed as Sulfur



► If you have pollutant descriptions/CAS #/code in your tracking software or internal calculations spreadsheet, you will want to update those!

#### **SLEIS Supporting Documentation**

The following documents are provided as supporting materials that may be useful who

- SLEIS Training Webinars
- SLEIS Facility Application Guide version 2.5
- SLEIS Code Tables (Excel Workbook)
- SLEIC File Import Specification (Batter/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 search
- Guide to Determining Oil and Gas Facility Categories
- Tips on reporting Flares, Tanks and Glycol Dehydrators in SLEIS



# Please be sure to view our other emission inventory training recordings!

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



