



Air Quality Division
Emissions Inventory Section
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Calendar Year 2017 Emissions Reporting Updates and Guidance

If you have specific questions or need any further information, please contact us or ask us at the workshop. We look forward to seeing you there.

Emissions Inventory Workshop – Our free, annual workshop will be held:

Norman – Tuesday, January 23, 2018
8:30 a.m. – 12:30 p.m.

Tulsa – Wednesday, January 31, 2018
8:30 a.m. – 12:30 p.m.

National Emissions Inventory (NEI) – The NEI is a comprehensive and detailed estimate of annual total air emissions of both criteria air pollutants (CAPs) and hazardous air pollutants (HAPs) from all air emissions sources. The NEI is prepared at least every three years by the U.S. EPA based primarily upon emissions estimates and emissions model inputs provided by State, Local and Tribal (SLT) air agencies, and supplemented by data developed by the EPA. *2017 is an NEI year and the ODEQ will be applying additional QC during and after data collection to help ensure the most accurate data is submitted.*

Future Emissions Inventory Web Based Reporting Tool – The ODEQ is in the process of reviewing web-based reporting tools in search of a possible replacement for Redbud. A new system may be available for reporting emissions inventories to the ODEQ in 2019 or 2020. Information on the conversion and training will be released when the new tool has been selected.

2017 Permit by Rule (PBR) Reporting Procedures:

- All PBRs will be loaded into Redbud.
- Facilities with over 5 TPY (for any regulated pollutant) for calendar year (CY) 2017 must report.
- Facilities first registered under the PBR in 2017 must report.
- Facilities at or below 5 TPY (for all regulated pollutants) for CY 2017 may elect the 2020 schedule, however, it is preferred that they choose Not Yet Built/Idle/Closed over the 2020 option if one of those statuses applies.
- When the reporter selects facility status “PBR-Schedule B (2020)” in Redbud, a popup box will appear in which the reporter is agreeing to the following: “I certify under OAC 252:100-5-2.1(a)(2)(B) that this facility is not required to report until 2020.” The emission units and associated records will not need to be updated.
- Annual Operating Fees are based on the most current inventory reported.

Volatile Organic Compound (VOC) Emissions – VOC emission factors and emission amounts should be reported as Total VOC. A Hazardous Air Pollutant (HAP) that is **also** a VOC must be calculated and reported uniquely if the emissions are above the reporting threshold. *Many facilities are calculating and reporting their Total VOC emissions but failing to include their*

HAPs in their VOC total. Please review your calculation methods for deriving Total VOC emission amounts and report Total VOC and speciated HAPs as appropriate. Exercise caution where a Total VOC emission factor excludes an individual HAP due to test method limitations.

Code Changes – The EPA has updated code tables that are used in the NEI. The ODEQ has incorporated these code changes into its system. Companies will find a note in Redbud at the facility or the affected emission unit where they are required to make any new code selections or if changes were applied by ODEQ staff prior to load into Redbud. A comprehensive listing of all code changes can be accessed at <https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-documentation>.

Codes affected:

- North American Industry Classification System (NAICS)
- Emission Unit Type
- Source Classification Codes (SCC)

Redbud – Internet Explorer (IE) is the only browser that fully supports Redbud. Compatibility views should be set to “off”. Instructions to revert Microsoft Edge to IE 11 can be found on the Redbud login page.

Web Site Improvements – Updates have been made to the Emissions Inventory website. The Frequently Asked Questions (FAQs) page has been reviewed and updated. The General Instruction page has been reviewed, improved, and reformatted. The SCC spreadsheet has been replaced with a link to the EPA's SCC searchable database. Data quality and the ease of navigation on the website will continue to improve.

Facility Transfers or Closures – The owner or operator of any facility that is required to submit an emissions inventory shall notify ODEQ in writing no later than 30 days following any transfer of ownership using Form 100-883. Oklahoma law and ODEQ rules are clear that the current owner of a facility (permit holder) is responsible for the submission of the annual emissions inventories and for paying the annual operating fees, including fees in arrears. All facilities will be loaded into Redbud under the current company owner. *We encourage companies to review their facility lists as early as possible and complete any administrative changes that have not been submitted and processed.*

Annual Operating Fees – Invoices for 2018 Annual Operating Fees will be mailed July 2, 2018. The fee for minor facilities is fixed at \$25.12 per ton of emissions of regulated air pollutant, and the fee for Title V facilities will be \$38.14 per ton.