

January 11, 2021

Bureau of Air Management: 2020 Annual Emissions Reporting Notice

Dear Owner/Operator of a Source requiring annual emissions reporting:

In accordance with section 182(a)(3)(B) of the Clean Air Act and section 22a-174-4(d)(1) of the Regulations of Connecticut State Agencies (RCSA), the Department of Energy and Environmental Protection (DEEP) requires the submission of emissions statements and compliance reports. These submissions are required for each facility that operated pursuant to a Title V permit at any time during calendar year 2020. Emissions statements are also required from each new Title V source that has yet to obtain a Title V permit, or from facilities requested by DEEP to submit emissions statements for other reasons. For the 2020 reporting period, the web-based Emissions Inventory Tracking System, called EMIT Online, is DEEP's required method to create and submit an official record of emissions to satisfy RCSA section 22a-174-4(d)(1) consistent with the Connecticut Uniform Electronic Transactions Act. The EMIT application allows online access to emissions-related data, as well as the ability to edit, save, and submit your emissions data electronically to the DEEP.

For calendar year 2020, each reporting facility must quantify and report actual emissions of the following pollutants from each source at the facility: oxides of nitrogen, volatile organic compounds, sulfur dioxide, particulate matter, carbon monoxide, lead, ammonia, and hazardous air pollutants (HAP).

CRITICAL PROCEDURAL GUIDANCE FOR 2020 REPORTING OF PM EMISSIONS:

For calendar year 2020 reporting, the EPA has increased its attention on Particulate Matter reporting scope and accuracy. Specifically, when sources are reporting PM₁₀ primary emissions and PM_{2.5} primary emissions, the reported values must include both PM filterable and PM condensable. EPA has also indicated that Connecticut needs to collect and report PM Condensable, PM₁₀ Filterable and PM_{2.5} Filterable in addition to PM₁₀ primary emissions and PM_{2.5} primary emissions. To facilitate emissions reporting, EMIT contains the U.S. Environmental Protection Agency's (EPA's) default emissions factors for PM reporting. Attached to this letter is detailed guidance on emissions reporting. In addition, DEEP staff will be available to answer your questions and assist you with any issues related to your emissions data reporting.

The annual emissions statements for Title V facilities will provide the basis for assessing emissions fees pursuant to RCSA section 22a-174-26(d). All Title V emissions statements must present the actual calendar year 2020 emissions and typical summer ozone season daily emissions of specified pollutants. The emissions estimates must also include emissions from startups, shutdowns, and malfunctions.

The EMIT system has been updated to improve data validation for users, track emissions for hazardous air pollutants, and has been populated with current EPA emission factors. As always, please pay particular attention to the emissions data, emissions factors, and the source list presented in your emissions statements.

Emissions statements and compliance reports must be filed with CT DEEP by March 1, 2021.

Title V emissions statements and compliance reports are accessible at <https://filings.deep.ct.gov/DEEPPortal/>. When accessing EMIT, **please use the Google Chrome browser**, not Internet Explorer. Access to EMIT requires each user to create an ezFile account and have facility rights defined in a subscriber agreement filed for an EMIT facility. If you have not yet created an ezFile account, or you are a first-time EMIT user, you must provide your ezFile information to DEEP, to allow an EMIT administrator to map the ezFile account to your EMIT account(s). Please review the attachments at the end of this letter for EMIT guidance documents containing assistance with new account creation, difficulties with logging in, and other common EMIT questions.

If you need additional assistance or have questions about emissions statement reporting, please contact the CT DEEP between 8:30 am and 4:30 pm Monday through Friday. During this time of telecommuting for most state employees, email is usually the best method for initial contact. For assistance with emissions statements please contact the EMIT Online helpdesk at deep.bam.ts@ct.gov, and for assistance with compliance reports please contact the Compliance Analysis & Coordination Unit at deep.CACU@ct.gov.

Sincerely,

Tracy R. Babbidge

Tracy R. Babbidge, Chief
Bureau of Air Management

TRB:RGR

Attachment A: Accessing EMIT Online

The information below is to assist you in understanding and navigating the DEEP ezFile portal, as it applies to accessing the EMIT application.

EMIT is now accessed through the DEEP ezFile Portal (<https://filings.deep.ct.gov/DEEPPortal/Account/>) via the Google Chrome browser. The use of the DEEP ezFile Portal provides new user self-management capabilities that should help reporters and a single account to access multiple EMIT accounts for users holding multiple EMIT accounts.

The DEEP ezFile Portal includes a user self-management interface that gives users the ability to create their account, find their account name, reset their passwords and change their challenge questions. The ezFile user help document (https://selfserve.deep.ct.gov/SelfService/UserHelp/User_Help_v3.0.0.4.pdf) describes these capabilities and other useful user self-management capabilities and provides links to assist in performing the desired action. You, the user, create and manage the DEEP ezFile account. A DEEP ezFile account used for EMIT reporting needs to be exclusively controlled by the user that signed the subscriber agreement. This is to ensure that the DEEP ezFile portal authentication remains consistent with the submitted and signed subscriber agreement. The DEEP ezFile portal only serves to authenticate a user. Access to EMIT with an ezFile account is only possible after the DEEP ezFile account is mapped to an EMIT account that defines security and accessibility within EMIT.

The EMIT user account is created by DEEP EMIT administrators based on the applicable subscriber agreement(s). EMIT account(s) function the same way that they did in the past, (i.e. verifying the user is the owner of an account via password and or challenge questions), except authentication is provided via DEEP ezFile using the DEEP ezFile that is mapped to the EMIT account. Mapping the EMIT account to the DEEP ezFile account is performed by DEEP EMIT administrators, who need to know information needed to map the accounts like the DEEP ezFile user name and email address for a particular EMIT user. EMIT users that have not provided DEEP ezFile information needed to provide this mapping will not have access to their EMIT account, until they provide DEEP ezFile account information to align their EMIT account to their DEEP ezFile account. The DEEP ezFile account must be created and managed by the user as DEEP cannot edit the account for you. The EMIT account and the mapping of the EMIT to the ezFile account are controlled and managed by DEEP.

2020 EMIT reporting will continue using DEEP ezFile authentication. The notification of external users on submission of an emissions statement or compliance report as well as the acceptance of an emissions statement after emissions statement submittal is not currently functional. Users wanting submittal verification will need to use the dated report filings option under the Documents tab. This will allow users to determine if a report was filed or recently amended by selecting a specific report including Emission Statement, Title V Compliance Certification, GPLPE Annual Compliance Certification, etc.

Attachment B

EMIT Online Reporting Guidance for Annual Emissions Submitters for Reporting Year 2020

The Air Quality Modeling and Emissions Inventory group (AQME), is leading the annual emissions reporting effort, please help us by attending to a few housekeeping items going forward:

- All parties required to submit emissions statements, shall do so electronically for the 2020 reporting season. The EMIT portal and its web pages are, in effect, the “forms provided by the Commissioner”. If you need help, we will schedule and provide training as needed for individuals or groups.
- Please review your editor and submitter authorizations for accessing EMIT and make sure that users have created a DEEP ezFile account and provided the account information to DEEP.
- Also please send updated authorizations for EMIT users to the AQME group of the Bureau of Air Management as needed:
 - [Link to: electronic signature authorization forms](#)
 - Please be sure the authorized representative has signed the forms granting his or her approval.
 - Please be sure that you provide ezFile account information to DEEP.
 - Please clearly notify AQME about any of the following:
 - account deactivations, (submitters and/or editors),
 - e-mail address updates,
 - site contact updates or any other updates that you would like DEEP to address.
 - Additional information is provided at the end of this attachment to assist in understanding and navigating the DEEP ezFile portal as it applies to EMIT.
- All reporting for the 2020 reporting season must be completed by **March 1, 2021**. This will allow DEEP sufficient time to process and approve emissions data, and provide billing information to affected sources. This reporting schedule will allow timely billing and subsequent payments by facilities, avoiding late charges and penalties required by regulation.
- Please exercise appropriate care when editing emissions data in EMIT, taking care to respond with an accurate, reliable, and defensible submission. Those tasked with editing and submitting responses in EMIT need to know this information is required by their Title V Permits and GPLPE registrations.

The following guidance for reporting Criteria and Section 112 pollutants is provided for sources required to submit an annual report in EMIT:

- 1) Sources at your site that meet the following requirements, should be reported on your annual emission statement:
 - a) Sources in Table II.A of your title V permit with source specific requirements
 - b) Sources operating under a permit-by-rule limit, (i.e. 3b or 3c)
 - c) Any new source that has been added to your site since your Title V permit was issued, that has source specific requirements (i.e. is subject to a New Source Review Permit (NSR), or section 3b or 3c of our regulations, NO_x RACT, VOC RACT, etc.)

- d) Sources already identified at your site in the DEEP inventory
- e) Each source or group of similar sources not covered in a) through d), for which the Permittee is subject to State or Federal air regulations requiring periodic recordkeeping of fuel or material consumption and, that emit greater than or equal to 0.5 tons/yr. of actual annual emissions of any one of the following pollutants: NO_x, SO₂, CO, PM₁₀ primary, VOC or lead during the reporting period,
 - **This does not include equipment and activities that would be categorized as Trivial Activities in accordance with White Papers 1 and 2, which can be found here: [EPA White papers](#), or any source listed and defined as an Insignificant Emissions Unit in section VI of the Title V application.**
 - For example, if you have 3 boilers that collectively emit greater than or equal to 0.5 tons/yr. of actual annual emissions of any one of the pollutants listed above, then these three sources should be reported as a group. Conversely, a group of similar sources would not meet this specific reporting criteria if, on an annual basis, they collectively emitted 0.4 tons of NO_x, 0.2 tons of SO₂, 0.1 tons of CO, 0.1 tons VOC, 0 tons PM₁₀ primary, and 0 tons Lead. Similar sources can be reported as a group if they are not subject to source specific requirements listed in Table II.A of your Title V permit. When reporting emissions from a group of similar sources, please maintain a record of how and for which sources these emissions were calculated.

NOTE: When reporting VOC emissions for small unpermitted, unregistered sources, remember it is our primary intent to have an accurate estimation of total VOCs reported for each source or group of sources meeting the reporting criteria. A corresponding representation of HAP emissions should be included if the HAP emissions reporting does not represent a significant burden to the Permittee.

- For Major Sources of HAPs you may report the emissions of just the highest HAP constituent(s) from that source or grouping of sources as the equivalent of Total VOC from that source or grouping of sources.
 - For Minor sources of HAPS, that are close to a Major HAP source threshold, and have been avoiding MACT requirements by claiming that potential emissions are below an applicable threshold, there should be a rigorous accounting of HAPs, even from these small sources. To reduce burden, you may report emissions for just the highest HAP constituent(s) in the VOC emissions from that source or grouping of sources as the equivalent of Total VOC from that source or grouping of sources. If there are multiple HAPS that are emitted in quantities close to a Major HAP threshold, then you should demonstrate that each of these individual HAPs aren't triggering any applicable requirements.
- f) You need not report emissions for any source or group of sources that satisfy d.) above, that have not emitted at least 0.5 tons/yr. of actual annual emissions of any one of the following pollutants: NO_x, SO₂, CO, PM₁₀ primary, VOC or lead during each of the last 3 calendar years.

NOTE: For each source or group of sources in EMIT at your site, that meet the specific criteria in this section f), please enter zero for that source's activity (e.g. fuel usage), and also enter a note as described in item 2 below to simplify inspections and future reporting. If you have any questions please do not hesitate to contact the AQME group at the Bureau of Air Management.

- For example, if you reported a group of space heaters that are not covered by a) through c) and that, as a group, has not actually emitted more than 0.5 tons/yr. of any one of the listed pollutants during each of the past 3 calendar years, then the group of space heaters does not need to be reported.

- Also, if you reported a source that is not part of a group of similar sources, is not covered by a) through c), and this source has not actually emitted more than 0.5 tons/yr. of any one of the listed pollutants during each of the past 3 calendar years, then the source does not need to be reported.
 - If any source or group of sources has been removed from EMIT but now needs to be reported because it satisfies criteria a) through c) or e) above, then **please contact the AQME group at the Bureau of Air Management to restore the source to your site's list of sources in EMIT.**
- 2) If you are reporting zeros for a source or group of sources that you previously reported emissions for, then you need to add a note to the emissions source or source group. To do this, go to the Source Information Tab for the source that you are reporting zero activity for, and then click on the Point ID label for the applicable source/source group entry. This will bring up the Notes tab and notes applicable to the Source Information tab. Check for an already existing Emission Reporting Exemption note. If the note already exists then click cancel to stop the addition of the note. If a note does not exist and is desired, then paste the subject provided below into the note subject text block and paste the description provided below into the note description block. This note has description text stating "Please copy this note forward", which DEEP intends to use for automatically populating the notes for future reporting periods. Any notes or replies stating "Please copy this note forward" will be tagged and copied forward. DEEP hopes to improve the EMIT application to provide users more direct control of this copy forward capability in the future. Click Save to complete the addition of the note. Clicking the Cancel button before saving the note will eliminate the note and all other entered data. Clicking the Delete button after saving the note, eliminates the note.
- a) *Subject:* Emission Reporting Exemption
 - b) *Description:* Emissions for PointId (your emissions unit number here with format E000XX), are below the reporting threshold, therefore the activity and emissions are being reported as zero in accordance with the reporting instructions. Please copy this note forward.
 - c) Termination of the 'note copy forward' or specific challenges with note maintenance should be directed towards AQME group at the Bureau of Air Management.
- 3) Emissions Calculations are to be based on the following listed in order of preference:
- i) CEMs/PEMs monitoring systems that are required by statute, regulation, or Permit or Order condition. Emissions data generated by these systems shall serve as the basis for emissions reported in EMIT;
 - ii) reference method emissions testing that has been deemed by the DEEP to be representative of current and normal operating conditions;
 - iii) a facility-specific emissions factor, approved by BAM/DEEP, or by Material or Mass Balance, if supporting documentation is submitted;
 - iv) EPA-published emissions factors, where available; some of these will be provided automatically in EMIT from WebFire.
 - v) Emissions factors from other industry and trade groups based on sound science. These should be discussed with AQME prior to use.
 - vi) Best engineering judgement
- 4) A new Emissions Factor Origin value has been introduced into EMIT. It is called 'No Default EPA Factor'. We have set the Emissions Factor Origin value to No Default EPA Factor, when there is no **EPA Emissions Factor** and no other Emissions Factor Origin has been provided for the Source/Source Classification Code (SCC)/Pollutant. If the pollutant is emitted from your source/SCC, then you must quantify these emissions. To do this, on the Emissions Information tab in EMIT, change the Emissions

Factor Origin to an appropriate value. If the Emissions Factor Origin is changed to “CEMS – Continuous Emissions Monitoring System” or “Tank Model” then EMIT will allow you to enter in the emissions directly. For all other Emissions Factor Origin values, you must provide an emissions factor and EMIT will calculate the emissions once the data is saved.

- 5) Sources should not report their SO₂ emissions as being based on CEMS unless there are actual SO₂ measurements being taken. If you are uncertain about your SO₂ Emissions Factor Origin, please call the AQME group.
- 6) Since PM_{2.5} is a subset of PM₁₀, PM₁₀ emissions cannot be less than PM_{2.5} emissions. There are some SCCs where the EPA default emissions factor for PM_{2.5} exists but the PM₁₀ emissions factor does not. If no reliable PM₁₀ primary emissions factor exists, then use a PM₁₀ primary emissions factor that results in the PM₁₀ primary emissions being equal to the PM_{2.5} primary emissions.
- 7) When reporting HAPS please double check to ensure that you have properly accounted for reductions from control equipment. For example, if you have VOC controls and your process also emits VOC HAPS, then please review to see if the control efficiency should also be applied to the VOC HAP pollutant for estimating your VOC HAP emissions.
- 8) Remember to report your control equipment and applicable pollutant(s) even if you cannot quantify the control efficiency, or the control efficiency is not used in the emissions calculations. For example units with low NO_x burners should identify this control device on the Source to Stack tab and Control Banks tab even though the percent control efficiency may not be known, or the control efficiency is not used in the emissions calculation because the emissions are based on CEM or an after control emissions factor. Control equipment descriptions that start with “zExpired” no longer exist, and should not be used.
**** Please contact DEEP before making changes to control equipment assignments.**
- 9) **Please contact DEEP before you change an existing SCC assigned to one of your sources.**
- 10) Sites should confirm compliance with DEEP reporting policy. An update to Source EU identifiers is recommended as it assists in confirming that all sources listed in Table II.A of the Title V permit are addressed.
- 11) Please review the fuel percent sulfur for distillate oil. Sulfur regulations have resulted in reduced fuel sulfur values. In the past, some facilities have reported apparent fuel sulfur violations or have not reported the fuel sulfur value.