

January 12, 2024

Bureau of Air Management: 2023 Annual Emissions Reporting Notice

Dear Source Owner/Operator:

In accordance with section 182(a)(3)(B) of the Clean Air Act and section 22a-174-4a(b)(l) 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 by March 1, 2024.

The annual emissions statements for Title V facilities, which operated pursuant to a Title V permit at any time during calendar year 2023, provides the basis for assessing emissions fees pursuant to RCSA section 22a-174-26(d). All Title V emissions statements must provide actual calendar year 2023 emissions and typical summer ozone season daily emissions of specified pollutants. The emissions estimates must also include emissions from startups, shutdowns, and malfunctions. Emissions statements are also required from each 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 calendar year 2023, each reporting facility must quantify and report actual emissions of the following air pollutants from each source at the facility: oxides of nitrogen (NOx), volatile organic compounds (VOC), sulfur dioxide (SO2), particulate matter (PM), carbon monoxide (CO), lead, ammonia, and hazardous air pollutants (HAP).

For calendar year 2023 reporting, the U.S. Environmental Protection Agency's (EPA's) remains focused on Particulate Matter reporting scope and accuracy. When sources are reporting PM₁₀ primary emissions and PM_{2.5} primary emissions, EPA has indicated that the reported values must include both PM filterable and PM condensable. Specifically, 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. Non-zero PM Condensable emissions are expected for fuel burning processes. To facilitate emissions reporting, the EPA's default emissions factors for PM reporting and PM Condensable emissions factors by fuel for various processes are provided on the EMIT Emissions Inventory webpage. 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.







EPA has also requested that states pay increased attention to emissions control reporting, including control efficiencies. Please ensure that controls and control efficiencies are reported where applicable and please verify the order of the control relative to flow. DEEP reports this information to Emissions Inventory System (EIS) which now requires the flow order. Redundant entries of controls are allowed in EMIT, where a single entry of the control would be sufficient. Changing flow order can be implemented without complications. DEEP assistance is recommended if simplification/correction of control assignments are needed.

For the 2023 reporting period, sources must use the web-based Emissions Inventory Tracking System (EMIT Online) to create and submit an official record of emissions to satisfy RCSA section 22a-174-4a(b)(l) consistent with the Connecticut Uniform Electronic Transactions Act. The EMIT Online platform allows access to emissions-related data, as well as the ability to edit, save, and submit emissions data electronically to DEEP.

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 source list presented in your emissions statements.

Emissions statements and compliance reports must be filed with DEEP by March 1, 2024.

Title V emissions statements are accessible at: https://filings.deep.ct.gov/DEEPPortal/. When accessing EMIT, please use the Google Chrome Browser. Access to EMIT requires each user to create a DEEP ezFile account that is owned and managed by the individual. 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, Esq.

Chief

Bureau of Air Management