

## Attachment B

### EMIT Online Reporting Guidance for Annual Emissions Submitters for Reporting Year 2023

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 shall submit emissions statements electronically for the 2023 reporting season and thereafter. 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 2023 reporting season must be completed by **March 1, 2024**. 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

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, NOx 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: NOx, SO2, CO, PM10 primary, VOC or lead during the reporting period,
    - **Note: 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.**
      - o For example, if you have 3 small boilers that collectively emit greater than or equal to 0.5tons/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 NOx, 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.**
      - o 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.

- o 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) On January 5, 2022, the EPA announced that 1-bromopropane (1-BP), also known as n-propyl bromide or nPB, has been added to the Hazardous Air Pollutants (HAP) list. For more information, please see Section 112 of the Clean Air Act ([87 Fed. Reg. 393](#)).
- g) EPA revised Chapter 7 of AP-42 regarding emissions from gasoline storage tanks. The TANKS section now includes the means of estimating emissions from roof landings, cleanings, and degassing of gasoline storage tanks. Arguably these emissions should have always been included in the determination of actual and potential emissions from bulk gasoline storage tanks. Therefore, to the extent that they are now quantifiable, sources with bulk gasoline storage tanks must now submit annual emissions statements that include emissions from roof landings, tank cleaning, degassing, etc. for every bulk gasoline storage tank at the premises.
- h) 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<sub>x</sub>, SO<sub>2</sub>, CO, PM<sub>10</sub> 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 h, 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.**
  - o 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.
  - o 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.

- o 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 for and will be 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, will also eliminate 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:
  - a) 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.
  - b) reference method emissions testing that has been deemed by the DEEP to be representative of current and normal operating conditions.
  - c) a facility-specific emissions factor, approved by BAM/DEEP, or by Material or Mass Balance, if supporting documentation is submitted.
  - d) EPA-published emissions factors, where available; some of these will be provided automatically in EMIT from WebFire.
  - e) Emissions factors from other industry and trade groups based on sound science. These should be discussed with AQME prior to use.
  - f) Best engineering judgement.
- 4) 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 SO<sub>2</sub> emissions 'based on CEMS' unless there are actual SO<sub>2</sub> measurements being taken. If you are uncertain about your SO<sub>2</sub> Emissions Factor Origin, please call the AQME group.
- 6) Since PM<sub>2.5</sub> is a subset of PM<sub>10</sub>, PM<sub>10</sub> emissions cannot be less than PM<sub>2.5</sub> emissions. There are some SCCs where the EPA default emissions factor for PM<sub>2.5</sub> exists but the PM<sub>10</sub> emissions factor does not. If no reliable PM<sub>10</sub> primary emissions factor exists, then use the PM<sub>2.5</sub> primary emissions factor for the PM<sub>10</sub> primary emissions factor.
- 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<sub>x</sub> 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.