

WELCOME TO THE CY 2021 EI WEBINAR!

- The webinar will begin in a few minutes...
- Please keep your video and audio off for the duration of the presentation.
- There will be a Q&A session at the end of the presentation.
- This presentation will be recorded and posted online.



ENVIRONMENTAL PROTECTION DIVISION

2021 Emission Inventory – GECO/CAERS Updates

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TRAINING GOALS

- Regulatory Info/Applicability of Emission Inventory
- Lessons learned in 2020EI submission
- New GECO features for the 2021 EI
- New Requirements for Fugitive Release Points
- HAPs Guidance
- What is CAERS
- Certifier and Preparer Information
- GECO EI Walkthrough
- EI Internal QA
- Resource Information
- Upcoming Training Opportunities/What's Next
- Questions



EMISSION INVENTORY REGULATION/APPLICABILITY





Regulations requiring GA EPD to collect an Emissions Inventory

- **1. Federal:** 40 CFR Part 51 Air Emissions Reporting Requirements (AERR) and the EPA Air Planning Agreement
- **2.** State: Georgia Rule 391-3-1-.02(6)(b)1.

States are required to annually report <u>actual</u> point source emissions data to EPA by <u>December 31st</u>. GA EPD requires participating facilities to report data by <u>June 30th</u>.



All Part 70 Major Sources are subject.

- Exceptions include:
 - Permitted but not constructed
 - Federally Enforceable Permit Limit (e.g., Synthetic Minor or Major HAP sources)
 - Shutdown during the entire calendar year

2021 EI Year is an Annual Year

- 1. Annual thresholds are higher than Triennial Year thresholds
- 2. Thresholds are PTE-based

Annual Year	PTE Thresholds
Pollutant	(tons per year)
SO ₂	≥2500
VOC	≥250
NOx	≥2500
СО	≥2500
Pb	
Primary PM_{10}	≥250
Primary PM _{2.5}	≥250
NH ₃	≥250



EI COLLECTION METHOD

- 1. Update Facility and Contact Information in Georgia Environmental Connections Online (GECO) EI
- 2021 GECO EI application launched on February 1
- Update Preparer(s) and Certifier contact information
 - All facilities must have one Certifier to certify participation status in CAERS
 - Opting out facilities will be required to download Opt-out Form
- 2. Opt-in/Opt-out of 2021 EI via Combined Air Emissions Reporting System (CAERS)
- CAERS launched for the 2021 EI on February 2
- New Users must register in CDX
- Existing users can update any information if needed
- Determines if your facility needs to participate
- Applicability is based on potential emissions; reporting is based on actual emissions. 2021 EI should be submitted to GA EPD through CAERS by June 30, 2022



LESSONS LEARNED FROM 2020EI



CAERS EI is Constantly Evolving

- Agile Process
- Updates released in sprints

Common Issues

- GECO EI/users contact info not match with CAERS users info
- Data Quality
 - opted-out
 - control devices/paths
 - Inconsistent emissions

Hazardous Air Pollutants (HAPs) emissions submission

- 12 facilities submitted HAPs in 2020 EI
- Submissions were not consistent between HAPs at CAERS and TRI
- HAPs pilot program to assist more facilities



LESSONS LEARNED FROM 2020 EI

- Critical Errors when submitting EI data to EPA
 - Unit/Process Operating Status Year
 - Operating operating status year is unit/process start year
 - Temporarily/Permanently Shutdown operating status year is unit/process's last EI submission year
 - If unit/process is operating one day in the year, it is considered operating for the EI year.

Control Device and Path

- Control path must have at least one device and one pollutant
- Control device must have one pollutant

• QA EI data

- Mass Balance and Engineering Judgement calculation method
- Require calculation spreadsheet to assist QA

• Extension request

- One week extension at a time
- Require actions and finish corrections before the extended deadline
- Compliance Engineers join the effort to speed up the final submission



WHAT'S NEW FOR GECO 2021 EI APPLICATION?





NEW FOR 2021 EI REPORTING

- CAERS User Role Information
 - All facilities must submit Certifier and Preparer Information into GECO first
 - Opt-out facilities must have a certifier to certify opting out status
- Opt-in/out at CAERS EI
 - Download Opt-out Form from GECO first
 - Log into CAERS via CDX to work on Opt-in/out process
- Opt-out Form
 - Opt-out facilities need to provide additional details to support opt-out status via this form
 - Upload to CAERS
- CAERS EI
 - Fugitive Release Point 2-D/3-D data requirements



NEW FOR 2021 GECO EI APPLICATION





NEW FOR 2021 GECO EI APPLICATION

Starting in 2022, the new Emission Click on blue links to update facility and contact information

- Based on previously available information, the Georgia Air Protection Branch will enroll facilities that may need to participate in the Emissions Inventory. (If your facility has not been enrolled, but you believe it should be participating in the EI, please email <u>emissions.inventory@dar.ga.gov</u>.)
- 2. Review basic Facility Information below and update as needed. Update the CAERS Users below. Please ensure all other contact information is correct.

For users new to CDX and CAERS, please be aware of the following roles:

a. A **preparer** is authorized to prepare an emissions report for <u>National Environment</u> Release Inventory (TRI) data for a given facility

3. The opt-in/opt-out process will continue at EPA's Central Data Exchange (CDX). See link below. CDX is used to access CAERS. Once in CAERS, select facility, then click on the "Create New Report" button for the 2021 EI Report. Prompts will help determine whether your facility will opt in or opt out.

If you are new to CAERS, you can click on <u>GECO EI/CAERS Troubleshooting Matrix</u> to help you determine how to get started in CAERS. If your facility may qualify to opt out, please download the <u>Opt-out form</u> to start your 2021 EI reporting and then upload this form to CAERS when you complete the required opt-out form.

Note: The preparers and certifiers you have specified should follow this process

Opt-out Form can be accessed here.



NEW FOR 2021EI REPORTING – OPT-OUT FORM

2021 Georgia Emission Inventory (EI) Opt-Out Form

Form instructions: Light yellow cells indicate a drop-down list. Cells with an asterisk (*) are a required data Upon completion, please upload this form into the Combined Air Emissions Reporting System (CAERS) as your opt-out justification.

Facility	Information
raciinty	mormation

Triennial/Annual El Year?	Annual
AIRS Number*:	
Facility Name*:	
CAERS Preparer*:	
Preparer Email*:	
CAERS Certifier*:	
Certifier Email*:	
Date Submitted*:	

Opt-Out Justification

Operating Status	
Permit number(s) applicable to Reporting '	Yea

* If Operating but below potential to emit (PTE) emission thresholds, it is required to list PTE emissions below and select PTE emissions justification. Additionally, provide permit condition number and/or PTE emissions calculations submitted for the applicable permit listed above. Please attach the justifications on another tab in this workbook or upload to CAERS in another excel workbook. *

			Annual
Pollutant	PTE Emissions (tpy)	Select PTE emissions justification.	EI Threshold
			(tpy)
VOC*			250
SO2*			2500
NOx*			2500
CO.			2500
Pb		Not applicable due to Annual El Yea	n/a
PM10*			250
PM25*			250
NH3*			250

If temporarily shutdown, please indicate the dates below:

Temporarilty shutdown date Planned re-opening date

If permanently shutdown, please indicate when the facility shut down.

Permanently shutdown date

Is the facility colocated with another facility?

Colocated facility name

Colocated Facility AIRS NO.



2021 GECO EI APPLICATION FLOW

- Home Page
 - List of facilities associated with your account
 - Click on the AIRS Number/Facility Name to access facility
- Application Status Menu
 - Summary of applications
 - Provides status and deadlines for each application
 - Click on "Emissions Inventory" to start 2021 EI

• EI Home Page

- Summary of 2021 EI Process
- Links so facility can update:
 - Facility information
 - Contact information (Preparer(s), Certifier, Emission Inventory, etc)
 - Opt-out Form download
 - Link to EPA CDX to connect to CAERS and determine EI participation



- Home Page
 - List of facilities associated with your account
 - Click on the "Begin/Continue Reporting" to access facility to determine EI participation status
 - Access to "Request Access to a New Facility" if your facility is not listed
- Facility Emissions Reports Menu
 - Determine 2021 EI participation via "Create New Report"
 - Access to past emission reports
 - Access to Bulk Upload Template
- Participation Questions to "Opt-in" or "Opt-out" via 2021 Report
 - Did the facility operate any portion of the calendar year?
 - Did the facility meet or surpass the PTE emission thresholds?
 - Opt-out will require "Opt-out Form" downloaded from GECO EI



ADDITIONAL NEW FEATURES IN CAERS

- Confidential Business Information Disclaimer
- Georgia specific announcement banner
- Report Creation Log shows facility what may have changed in the EI report generated for the current reporting year. Examples include:
 - Permanently shutdown units, processes, release points, etc are removed
 - USEPA emission factors have been updated and thus emissions are recalculated
- Additional Quality Checks for controls
 - Ensures a pollutant is assigned
- Fugitive Release Point 2-D/3-D data requirements
 - See Appendix B in CAERS User Guide V3 for more details.
- CAERS User Guide V3
 - Appendix D CAERS Submission Checklist



NEW REQUIREMENTS FOR FUGITIVE RELEASE POINTS



Requires height, length, width, and angle.

@ Exit Gas Velocity Measure: **@** Exit Gas Velocity UoM: Exit Gas Flow Rate Measure: Exit Gas Flow Rate UoM: **O** Fugitive Height Measure: 400 FT **?** Fugitive Angle Measure (degrees azimuth): 45 **@** Fugitive Length Measure: **?** Fugitive Width Measure: 20 FT 30 FT

See Appendix B: Types of Fugitive Release Points of CAERS Guide 3.0 for more information.



NEW FOR 2021EI REPORTING – FUGITIVE RELEASE POINTS

2-Dimensional Fugitive Release Points

• The 2 set of coordinates represent the length measurement of fugitive area option



		Release Poir	nt Information		
	Release Point ID:*	FUG2D	Operating Status:*	Operating	~
T . 1 / T 1, 1	Release Point Description:	1	Operating Status Year:	2021	
Latitude/Longitude	Release Point Type:*	Fugitive 2-D: Two Midpoint Coord Pa 🗸 🗸	Fence Line Distance Measure:		FT
of the midpoints of	Mid Point 1 Latitude Measure:*	30	Mid Point 1 Longitude Measure:*	-84	
opposing sides of	Ø Mid Point 2 Latitude Measure:*	30.001	O Mid Point 2 Longitude Measure:*	-84.001	
source.	Exit Gas Velocity Measure:		Sexit Gas Velocity UoM:		~
	Sexit Gas Flow Rate Measure:		Exit Gas Flow Rate UoM:		~
Requires height and	Fugitive Height Measure:*	400 FT	Pugitive Angle Measure (degrees azimuth):		
width of release.	Pugitive Width Measure:*	30 FT			

See Appendix B: Types of Fugitive Release Points of CAERS Guide 3.0 for more information.

NEW FOR 2021EI REPORTING – FUGITIVE RELEASE POINTS

Graphical Representation of 3-Dimensional Fugitive Release Points



See Appendix B: Types of Fugitive Release Points of CAERS Guide 3.0 for more information.



HAPS GUIDANCE



HAPS PILOT PROGRAM

- Georgia EPD is considering recommending to the Board of Natural Resources that they adopt regulations requiring HAPs reporting.
- This year, we are forming a pilot program to provide more resources for facilities that wanted to voluntarily report HAPs this year.
- Participating in the pilot program will allow:
 - Access to training from EPD on how to report HAPs.
 - Input into future implementation and guidance process, including threshold information.
 - HAPs data reported to CAERS will pre-populate Toxics Release Inventory (TRI) air toxics emissions
- If your facility has HAPs emissions and interested in knowing more, send an email to <u>emissions.inventory@dnr.ga.gov</u> to with "HAPs Pilot Program" as the subject.



HAPs can be reported in CAERS just like CAPS.

Emissions Assoc	iated with this Proc	cess					
Pollutant Name	Code	CASID		• Pollutant:*	sty	Pollutant Code:	
Acrolein	107028	107-02-8	Ō		Sty rene - 100425 - 100-42-5		
Aniline	62533	62-53-3	ā	Pollutant Name:	Sty rene Oxide - 96093 - 96-09-3) CASID:	
Benzene	71432	71-43-2	Ō	Calculation Method:*			~
Carbon Disulfide	75150	75-15-0	Ō	Emission Factor:*		Emission Factor Description:*	
PM Condensible	PM-CON		Ē				
PM10 Filterable	PM10-FIL		ā	•	~	0	~
PM2.5 Filterable	PM25-FIL		Ō	Emission Factor Numerator UoM:		Emission Factor Denominator UoM:	
Phenol	108952	108-95-2	Ō	*		*	
Styrene	100425	100-42-5	Ē	Overall Control %:			
Toluene	108883	108-88-3	Ō	Total Emissions:*		Emissions UoM:*	~
Volatile Organic Compounds	VOC		亩			□ I prefer to calculate	the total emissions of this pollutant
			+				•





HAPS GUIDANCE

When a VOC or PM HAP is reported, it **should** also be included in the corresponding CAP total. Total HAP cannot not exceed CAP total.

		Pollutant	Туре	Fugitive Amount	Stack Amount	Units of Measure	2021 Reported Emissions	Previous Year Reported Emissions	Previous Submittal Year
	VOC HAP	1,3-Butadiene	HAP	0	0.01777006	Tons	0.01777006	None Reported	
	PM HAP	Arsenic	HAP	0	0.00000935	Tons	0.00000935	None Reported	
		Carbon Monoxide	CAP	0	3.92528	Tons	3.92528	None Reported	
		Chromium	HAP	0	0.00006542	Tons	0.00006542	None Reported	
		Dibenzofuran	HAP	0	0.00041084	Tons	0.00041084	None Reported	
		Ethyl Benzene	HAP	0	0.13070006	Tons	0.13070006	None Reported	
		Hexane	HAP	0	0.8813095	Tons	0.8813095	None Reported	
		Lead	CAP	0	0.00002336	Tons	0.00002336	None Reported	
		Mercury	HAP	0	0.00001215	Tons	0.00001215	None Reported	
		Naphthalene	HAP	0	0.03418941	Tons	0.03418941	None Reported	
		Nitrogen Oxides	CAP	0	4.67295	Tons	4.67295	None Reported	
		o-Xylene	HAP	0	0.51058746	Tons	0.51058746	None Reported	
		Phenol	HAP	0	0.03654564	Tons	0.03654564	None Reported	
		PM Condensible	CAP	0	0.91266219	Tons	0.91266219	None Reported	
Tota	l PM 🔶	PM10 Filterable	CAP	0	1.02334769	Tons	1.02334769	None Reported	
		PM2.5 Filterable	CAP	0	0.64630429	Tons	0.64630429	None Reported	
		Styrene	HAP	0	2.26455793	Tons	2.26455793	None Reported	
		Sulfur Dioxide	CAP	0	0.0280377	Tons	0.0280377	None Reported	
		Toluene	HAP	0	0.61990904	Tons	0.61990904	None Reported	
Tota	I VOC 🔶	Volatile Organic Compounds	CAP	0	57.940939	Tons	57.940939	None Reported	
		Total Emissions (Tons)					73.64561109	0	

Total VOC (57.94 tons) \geq Total HAP VOC (4.50 tons) \checkmark Total PM10 (1.02 tons) \geq Total PM HAP (0.00017 tons) \checkmark

Note: HAP emissions should match what is reported to TRI.



WHAT IS CAERS?



CAERS (Combined Air Emissions Reporting System) is an application that allows industry from subscribed State, Local, or Tribal authorities (or SLTs) to report their air emissions.

This allows:

- SLT's to meet specific air emissions reporting requirements
- Annual or triennial reporting to meet the requirements of the Air Emissions Reporting Requirements (AERR) rule
- Facilities are recommended to voluntarily report HAPs emissions at process level which could be used to pre-populate Toxics Release Inventory (TRI) air toxics emissions.
 - TRI data must still be completed and certified in TRI-MEweb
 - EPD is continuously encouraging facilities to submit HAPs emissions to CAERS



Preparer

- Is authorized to determine EI participation via CAERS and/or prepare an emissions report for a facility (e.g., consultant, staff person working for the facility).
- A facility can have multiple preparers (each with an individual account associated with the facility).
 - If submitting HAPs data for TRI within CAERS, this could include the TRI preparer.
- A single preparer can be associated with more than one facility (an individual account associated with several facilities).
- A preparer does not fulfill the same role as the Certifier
 - Not authorized to certify opt-out status
 - Not authorized to certify and submit the report on behalf of the facility



Certifier

- Can determine EI participation status via CAERS and/or prepare the emissions report
- Is authorized to certify the emissions report or opting out of the EI to meet your legal obligation for reporting to your SLT.
- Only one Certifier for a facility.
- A single Certifier can have multiple facilities (multiple facilities associated with the certifier account).
- The Certifier can also be a preparer (only one CAERS account needed).
- Total toxics air emissions are made available for TRI-MEweb once the facility has certified the report in CAERS. <u>Note: CAERS certification is not a certification</u> of the TRI submission. Toxics air data are certified in TRI-MEweb, not CAERS.



GECO EI APPLICATION WALKTHROUGH







Emissions Inventory

The <u>National Emissions Inventory</u> (NEI) is a detailed estimate compiled by the US EPA of air emissions that include criteria pollutants and hazardous air pollutants from air emissions sources. Emissions inventory data for all Part 70



ACCESS TO YOUR FACILITY (1)

SECO Home eorgia Environmental Connections Or eorgia Air Protection Branch application ou have access to work on the follow	nline ("GECO" ions. ing facilities:	Ret sho box acce	urning u uld see y checked ess the E	sers – Once your facilitie d. Click on ' EI applicatio	signed in, you s listed and the Facility Name n.	e El
Facility Name	AIRS Number	Admin Access	Permit Fees	Emissions Inventory	Emissions Statement	
Brunswick Cellulose LLC	127- 00003					
Durango-Georgia Paper Company	039- 00001					
GEORGIA POWER CO PLANT MCDONOUGH- ATKINSON	067- 00003			~		
Request access to a facility		Nev usir	v Users ng the hy	– Request ad per link on	ccess to your f the home page	acili







APPLICATION STATUS MENU

Current facility: Durango-Georgia Paper Company, St. Marys AIRS Number: 039-00001

Switch facility Facility home

Home Facility Info User Access Communication Preferences

Facility Home

GECO Applications	Current Status	
Permits & Application Fees	0 open permit applications.	
Annual/Emissions Fees	In Progress - Please Complete the Fees for 2019 on July 28, 2020. Due: September 1, 2020	
Fees Summary	Access 2021 EI Applicatio	n here
Emissions Inventory	Enrolled in 2021 EI.	
	Duc. June 30, 2022	
Test Notifications	No pending test notifications.	



Emissions Inventory

EI Home Historical Data

Facilities whose potential emissions equal or exceed the thresholds must report their actual emissions. For assistance with calculating PTE, please use the <u>Potential to Emit Guidelines</u>. Since the 2019 Emissions Inventory, Georgia has used the *Combined Air Emissions Reporting System* (CAERS) developed by U.S. EPA.

Starting in 2022, the new Emissions Inventory process will be as follows:

- Based on previously available information, the Georgia Air Protection Branch will enroll facilities that may need to participate in the Emissions Inventory. (If your facility has not been enrolled, but you believe it should be participating in the EI, please email emissions.inventory@dnr.ga.gov.)
- Review basic Facility Information below and update as needed. Update the <u>CAERS Users</u> below. Please ensure <u>all</u> <u>other contact information</u> is correct.

For users new to CDX and CAERS, please be aware of the following roles:

- a. A preparer is authorized to prepare an emissions report for National Emissions Inventory (NEI) and/or Toxics Release Inventory (TRI) data for a given facility. You may be a consultant, or a staff person for the company owning the facility.
- b. A certifier is authorized to sign the emissions report on behalf of the facility to meet your legal obligation for reporting to your State, Local, or Tribal authority (SLT).

Note: A certifier is only needed to complete the opt-out form. However, a designated preparer may fill out the optout form but must notify the designated certifier to formalize the opt-out status.

3. The opt-in/opt-out process will continue at EPA's Central Data Exchange (CDX). See link below. CDX is used to access CAERS. Once in CAERS, select facility, then click on the "Create New Report" button for the 2021 EI Report. Prompts will help determine whether your facility will opt in or opt out.

If you are new to CAERS, you can click on <u>GECO EI/CAERS Troubleshooting Matrix</u> to help you determine how to get started in CAERS. If your facility may qualify to opt out, please download the <u>Opt-out form</u> to start your 2021 EI reporting and then upload this form to CAERS when you complete the required opt-out form.

Note: The preparers and certifiers you have specified should follow this procedure if new to CDX/CAERS:

a. Register in CDX using the link below and set up CAERS in CDX.

b. Await approval that your CAERS account is linked to the correct facilities.

c. Once approved, select facility, then click on the "Create New Report" button for the 2021 Report.

Link to EPA CDX









FACILITY INFORMATION

Facility Info	ormation	Current facilit Durango-Ge AIRS Number	ty: eorgia Paper C r: 039-00001	Company, St. Marys	
Description	Kraft Pulp Mill				
Operating Status	Operating as reported in 2020 * Operating status pertains only to Emissions Inve	Edit E	I Facili	ty Information	
NAICS Code	322130 - Paperboard Mills	Name ar	d Addres	s	
Site Address	4244 International Parkway Suite 120-tes ATLANTA, GA 30354	If the facilit	y name or ad	dress are incorrect, please email <u>emissior</u>	ns.inventory@dnr.ga.gov.
Geocoordinates	30.805990, -81.524999	Name	Durango-	Georgia Paper Company	
Cro Tra	wder Construction iler KB	site Addre	ss 4244 Inte	A 20254 tact us for name/add Kraft Pulp Mill	ress issue(s).
Step 1:	Verify facility information	NAI CS Cod	le	322130	NAICS Lookup
Google Map data ©	2022 Imagery ©2072 Maxar Technologies, U.S. Geological S tindow	Descriptio	n Comment	Site status updated from IAIP	
Edit Facility Infor	mation	Geograp Facility latit	hic Coord	inates e must be located at the center of the pro-	duction area.







$\leftarrow \mathsf{Back} \text{ to EI Home}$

CAERS Users

Use of CAERS requires only one certifier and at least one preparer (multiple preparers are permitted). If a single person serves both roles, they must be added as both.

Current CAERS Users

Role	User	Address	Email	Phone	Controls
Certifier	Ms Maria Geonczy	4244 International Pkwy emissions.inventory@dnr.ga.gov Suite 120 Atlanta, GA 30354			<u>Edit Delete</u>
Preparer	Ms Maria Geonczy	4244 International Pkwy Suite 120 Atlanta, GA 30354	emissions.inventory@dnr.ga.gov		Edit Delete
Add Nev	w CAERS User				
_					
	Add addition	al preparers.	Modify cu	rrent	users.



Starting in 2022, the new Emissions 1. Based on previously available in	<i>Current facility:</i> Durango-Georgia Paper C AIRS Number: 039-00001	ompany, St. Marys		Switch facility
participate in the Emissions Inv participating in the EI, please e	Home Facility Info	User Access Comm	nunication Preferences	
2. Review basic Facility Information other contact information is con	Set your preferences for is set separately for each ty	receiving communication pe of communication.	ns from the Georgia Environmental P	rotection Division. Preferences can be
a. A preparer is authorized Release Inventory (TRI) o	Permit Fees Permit Applications	Edit Preferent	ces for Emissions Inve	ntory
	Emissions Inventory Emissions Statement Testing and Monitoring	Salutation First Name Last Name	Mrs Jing Wang	("Ms.", "Dr.", etc.)
Step 3: Verify any other	contact	Title Organization Street Address	Engineer 4244 International Parkway Suite 120	required
		Apt / Suite / Other City	ATLANTA	required
		State	GA	required
		Postal Code	30354	required
		Primary Contact Email	jing.wang@dnr.ga.gov	required
		Save Contact Info		



access CAERS. Once in CAERS, select facility, then click on the "Create New Report" button for the 2021 EI Report. Prompts will help determine whether your facility will opt in or opt out.

If you are new to CAERS, you can click on <u>GECO EI/CAERS Troubleshooting Matrix</u> to help you determine how to get started in CAERS. If your facility may qualify to opt out, please download the <u>Opt-out form</u> to start your 2021 EI reporting and then upload this form to CAERS when you complete the required opt-out form.

Note: The preparers and certifiers you have specified should follow this procedure if new to CDX/CAERS:

a. Register in CDX using the link below and set up CAERS in CDX.

b. Await approval that your CAERS account is linked to the correct facilities.

c. Once approved, select facility, then click on the "Create New Report" outton for the 2021 Report.

Link to EPA CDX

Download Opt-Out form if you believe your facility does not meet participation requirements.

OPT-OUT FORM (1)

2021 Georgia Emission Inventory (EI) Opt-Out Form Read Me

The instructions below cover the contents of the Opt-out Form on the next tab.

+Light yellow cells indicate a drop-down list. Cells with an asterisk (*) is a required data field. Upon completion, please upload this form into the Combined Air Emissions Reporting System (CAERS) as your opt-out justification.

Facility Information

1. Triennial/Annual El Year - The facility should select if it is an annual or triennial Emission Inventory (EI) year. Though, the appropriate year will most likely be pre-selected by Georgia APB. By selecting the type of El year, the form will adjust the potential to emit (PTE) emission thresholds in the PTE emissions threshold table according to the year.

2. AIRS Number - Enter the 8-digit AIRS number. The first three numbers indicate the county the facility is in and the last 5 digits are the facility number. Dash or no dash is allowed (123-45678 or 12345678)

Facility Name – The facility name should match the latest permit.

CAERS Preparer/Email - These fields do not need to be filled out if the facility does not need a preparer. Some facilities may have a Preparer who sets up the account in CAERS, answers the opt-out prompts in CAERS and fills out and uploads the Opt-out Form; and a Certifier who reviews everything and certifies the Opt-out selection. Other facilities may have the Certifier complete all tasks.

5. CAERS Certifier/Email - All opt-out facilities will have a certifier so this field needs to be completed. See item 4 for an explanation.

Opt-Out Justification

Operating Status - The options are Operating, Closed/Dismantled, Temporarily Closed. The facility must be closed for the entirety of the EI reporting year to be considered the latter two statuses.

 Permit number(s) applicable to Reporting Year – The facility must acknowledge that PTE emissions correspond to the permit applicable to the EI reporting year. For example, a permit issued in January 2022 does not apply to the 2021 EI year. All amendments that have pertinent PTE emission data to the permit should be included.

9. If Operating but below potential to emit (PTE) emission thresholds, it is required to list PTE emissions below and select PTE emissions justification. Additionally, provide permit condition number and/or PTE emissions calculations submitted for the applicable permit listed above. Please attach the justications on another tab in this workbook or upload to CAERS in another excel workbook. - This section must be filled out if the facility operated at any point during the EI reporting year. Disregard

if "Closed/Dismantled" or "Temporarily Closed." Attach supporting data in another tab or in another excel spreadsheet. Proof must be reproducible and referenced.

10. PTE Emissions (tpy) / Select PTE emissions justification - These PTE emissions should not be recalculated anew for a new result. They should be either (1) the PTE emissions data that was used to compile the permit application or (2) the requested permit emission limit. For example, a permit condition can require the facility to never exceed 249 toy. Once you enter the PTE emissions data for each pollutant, you'll select one of the following justification options. Resources are located under each type:

a. Requested permit limit

i.https://permitsearch.gaepd.org/

b. PTE calculated for Title V application

https://permitsearch.gaepd.org/ (permit narrative)

i.https://gatv.gaepd.org/GATV/default.asp (Title V archive)

iii.https://geos.epd.georgia.gov/GA/GEOS/Public/Client/GA_GEOS/Public/Pages/PublicApplicationList.aspx (GEOS Public Inquiry Portal)

If you have a hard time locating your PTE emissions applicable for the EI reporting year, please contact your Stationary Source Permit or Compliance Engineer.

11. Annual/Triennial El Threshold (tpy) - This is determined by choosing El reporting year type in the facility information section. These thresholds are from "Table 1 to Appendix A of Subpart A - Emission Thresholds by Pollutant for Treatment as Point Source Under 40 CER 51.30"

12. If temporarily shut down, please indicate the dates below: - The facility must be temporarily shut down prior to the emission inventory year to be able to opt out. a. Temporarily shutdown date

b.Planned re-opening date

13. If permanently shut down, please indicate when the facility shut down. - The facility must be shut down prior to the emission inventory year to be able to opt out.

a.Permanently shut down date

14. Is the facility colocated with another facility? - Select yes/no if facility is colocated with another facility. If so, provide name and AIRS number.

a.Colocated facility name

b.Colocated Facility AIRS NO.

Facility Information	
Triennial/Annual El Year?	Annual
AIRS Number*:	03900001
Facility Name*:	Durango-Georgia Paper Company, St. Marys
CAERS Preparer*:	Maria Geonczy
Preparer Email*:	emissions.inventory@dnr.ga.gov
CAERS Certifier*:	Maria Geonczy
Certifier Email*:	emissions.inventory@dnr.ga.gov
Date Submitted*:	Monday, February 7, 2022

Opt-Out Justification

Operating Status

Permit number(s) applicable to Reporting Year'

Operating 2631-039-0001-V-07-0

n/a

No

n/a

n/a

If Operating but below potential to emit (PTE) emission thresholds, it is required to list PTE emissions below and select PTE emissions justification. Additionally, provide permit condition number and/or PTE emissions calculations submitted for the applicable permit listed above. Please attach the justifications on another tab in this workbook or upload to CAERS in another excel workbook. *

			Annual
Pollutant	PTE Emissions (tpy)	Select PTE emissions justification.	EI Threshold
		-	(tpy)
VOC*	240	6 PTE calculated for Title V application	250
SO2*	2400	8 PTE calculated for Title V application	2500
NOx*	1919	PTE calculated for Title V application	2500
CO*	200	Requested permit limit.	2500
Pb		Not applicable due to Annual El Yea	n/a
PM10*	24	5 PTE calculated for Title V application	250
PM25*	17	5 PTE calculated for Title V application	250
NH3*			250

If temporarily shutdown, please indicate the dates below:

Temporarilty shutdown date	n/a
Planned re-opening date	n/a

If permanently shutdown, please indicate when the facility shut down.

Permanently shutdown date

Is the facility colocated with another facility?

Colocated facility name

Colocated Facility AIRS NO.



OPT-OUT FORM (2)

	Facility Information Triennial/Annual El Year? AIRS Number*:	03900001	Annual		
Light yellow cells are d	rop-down lists CAERS Certifier*: Certifier Email*: Date Submitted*:	Maria Geonczy Maria Geonczy Maria Geonczy emissions.inventory@c Monday, February 7, 2	er Company, St. Marys dnr.ga.gov dnr.ga.gov 022	r* n/a Operating Closed/Dismantled Temporarily Closed	Operating v
	Opt-Out Justification Operating Status Permit number(s) applica * If Operating but below po emissions below and selec	able to Reporting Year* otential to emit (PTE) e ct PTE emissions justi	Operating 2631-039-0001-V-07- mission thresholds, it is required ification. Additionally, provide per	0 to list PTE mit condition	
	number and/or PTE emiss attach the justifications or workbook. * Pollutant VOC*	PTE Emissions (tpy)	nitted for the applicable permit list orkbook or upload to CAERS in an Select PTE emissions justification. PTE calculated for Title V application	Annual El Threshold (tpy) 250	Annual PTE Thresholds
	NOx* CO* Pb PM10* PM25* NH3*		PTE calculated for Title V application PTE calculated for Title V application Requested permit limit. Not applicable due to Annual EI Yea PTE calculated for Title V application PTE calculated for Title V application	2500 2500 2500 n/a 250 250 250	
	If temporarily shutdown, p Temp Pl Sermanently shutdown, Perm	lease indicate the data porarilty shutdown date lanned re-opening date please indicate when hanently shutdow	es below:		44



OPT-OUT FORM (3)

* If Operating but below potential to emit (PTE) emission thresholds, it is required to list PTE emissions below and select PTE emissions justification. Additionally, provide permit condition number and/or PTE emissions calculations submitted for the applicable permit listed above. Please attach the justifications on another tab in this workbook or upload to CAERS in another excel workbook.*

Annual issions justification. EI Threshold (tpy) for Title V applicatior 2500 for Title V applicatior 2500 for Title V applicatior 2500 mit limit. 2500
(tpv) for Title V application 250 for Title V application 2500 for Title V application 2500 mit limit. 2500
for Title V application 250 for Title V application 2500 for Title V application 2500 mit limit. 2500
for Title V application 2500 for Title V application 2500 mit limit. 2500
for Title V application 2500 mit limit. 2500
mit limit. 2500
due to Annual El Yea n/a
for Title V application 250
for Title V application 250
250
n/a

Please provide proof of PTE calculations or permit limit condition in workbook or upload in CAERS. (Excel files only.)

PTE should be the PTE emissions used to compile the permit that correlates the EI calendar year.

To determine the PTE submitted, the following sources can be found on the Georgia Emissions Inventory webpage:

- Permit and/or permit narrative
- Initial or renewal Title V applications
- PTE Guidelines



If facility was temporarily or permanently shut down during 2021 (e.g. January 20, 2021), the facility is considered operating for 2021 (unless below PTE thresholds). No operation can occur at any point during 2021 to be considered opted out.

PM25* 175 PTE (NH3*	calculated for Title V application	250 250	
If temporarily shutdown, please indicate the dates b	pelow:		
Temporarilty shutdown date	n/a		
Planned re-opening date	n/a		
If permanently shutdown, please indicate when the Permanently shutdown date	facility shut down. n/a		
Is the facility colocated with another facility?	No		
Colocated facility name	n/a		
	Ti/a		



Link to EPA CDX

access CAERS. Once in CAERS, select facility, then click on the "Create New Report" button for the 2021 EI Report. Prompts will help determine whether your facility will opt in or opt out.

If you are new to CAERS, you can click on <u>GECO EI/CAERS Troubleshooting Matrix</u> to help you determine how to get started in CAERS. If your facility may qualify to opt out, please download the <u>Opt-out form</u> to start your 2021 EI reporting and then upload this form to CAERS when you complete the required opt-out form.

Note: The preparers and certifiers you have specified should follow this procedure if new to CDX/CAERS:

a. Register in CDX using the link below and set up CAERS in CDX.

b. Await approval that your CAERS account is linked to the correct facilities.

c. Once approved, select facility, then click on the "Create New Report" button for the 2021 Report.

Click here to be directed to CDX to access participation prompts in CAERS.





Welcome

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.



CAERS – OPT OUT





CAERS – OPT OUT

<u>My Facilities</u> > Emissions F	<u>Reports</u> > 2	021 Emissions Report						▲ <u>CBI Disclaimer</u> Help
Agency ID: 99999999 Facility Inc. 123 Main Street Mytown, GA 12345 2021 Emissions Report		Report Facility & Emis	sions Inf	ormation	Perform Q	Quality Checks	Submit to SLT Authority	Approved by SLT Authority
Agency: GADNR Report Summary	Atta	Pollutant Total Emissions (Tons)	Type 	Fugitive Amount User Name lysis be	Stack Amount fore	Units of Measu Prepa	Attach opt-out form and any other proof of PTE documentation (excel files only).	ions Previous Submittal Year y Download Process Emissions Summary s Attach Report Document
	stat	us.	гу . 	your op	i out		You must attach your Potential to Emit	(PTE) analysis before you can certify and submit. Certify and Submit to SLT





CAERS – OPT IN

Facilities > Em	nissions Reports		A <u>c</u>	<u>Bl Disclaimer</u> <u>Help</u>
ncy ID: 999999999	Emission Reporting Opt-In		×	
Main Street own, GA 12345	You are about to report facility emissions data for		ate New Report	
	Was this facility operating in 2021?			
	 Yes, Operating No, Temporarily Shutdown No, Permanently Shutdown 	te • Delete		
	Facility Emissions Thre	sholds		
	Note that the thresholds below pertain to <i>potent</i> actual emissions.	ial emissions, except for lead.	The threshold for lead (Pb) is based on	
	Pollutant	Threshold (tpy)		
	VOC	250		
	SOx	2500		
	NOx	2500	0 1 1 1 1	2021 EI
	со	2500	Submit to begin	1 2021 EI.
	PM10-PRI	250		
	PM25-PRI	250		
	NH3	250		
	Is the facility below ALL of the th O Yes No	nresholds listed?		
			Cance Submit	
	EPA Home MyCDX Ac	cessibility Notice Privacy a	nd Security Notice	



GEORGIA INTERNAL QA CHECKS

GEORGIA INTERNAL QA CHECKS

- Participation Opt-out form will be reviewed.
 - Verify Shut-down status
 - Verify PTE calculations or Permit conditions
- Control units listed in CAERS are compared against permits
- Emissions Data
 - Facility-wide CAP totals ≥ 100 tpy
 - Calculations for process level emissions data are checked for correctness and reproducibility
 - Facility-wide CAP totals increase/decrease of >20% from previous year
 - Reasons that the total emissions are increased or decreased > 20%
- Check to see if stack test data could be used
- EI vs. ES
 - Actual NOx and VOC emissions for the same year
- Possible HAPs QA checks if reported
 - Total HAPs emissions increased or decreased >10%
 - The reason for such difference of total HAPs



RESOURCES AND NEXT STEPS



• GECO EI Application Training PowerPoint and Recording

https://epd.georgia.gov/forms-permits/air-protection-branch-forms-permits/airemissions/submit-emissions-inventory

• CAERS User guide

https://epd.georgia.gov/forms-permits/air-protection-branch-forms-permits/airemissions/submit-emissions-inventory

Can also be accessed from within CAERS

on	ns Reports	▲ <u>CBI Disclaim</u> r <u>Help</u>	
		Emissions Reports	
	2021 Report	Upload Report - Create New Papart	

• Past EPA CAERS Webinar Recordings

https://www.epa.gov/e-enterprise/e-enterprise-combined-air-emissions-reporting-caer



• EPA Training (March – April)

Please visit <u>https://geco.gaepd.org/EventRegistration/</u> to register the trainings.

- CAERS EI User Interface: March 23, 2022 (Wednesday) 1-3PM (ET)
- CAERS EI Bulk Uploading Template: March 30, 2022 (Wednesday) 1-3PM (ET)
- CAERS EI Control Path: April 13, 2022 (Wednesday) 1-3PM (ET)
- Live Virtual Help Sessions (April June)
- Create Video clips for common how-to questions
- Georgia EPD will QA the EI data as soon as it is submitted
- Georgia EPD might reach out to the facilities after June 30 or after we QA the EI data about the errors or data verifications





Your efforts are very appreciated, and you help us reach our goal of obtaining and maintaining accurate emissions inventories for the state of Georgia. Thank you for your patience, all the work that you do and cooperating with us to achieve this common goal!





Contact us at: emissions.inventory@dnr.ga.gov



58