

ENVIRONMENTAL PROTECTION DIVISION

2022 Emission Inventory – GECO/CAERS Updates

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Georgia Environmental Protection Division

2022 EI Point Source Emission Reporting
Training Webinar

February 13, 2023



TRAINING GOALS

- Regulatory Info/Applicability of Emission Inventory
- What is CAERS?
- GECO EI & Application Walkthrough
- CAERS EI Updates & Opt-in /Opt-out Walkthrough
- EI QA & Opt-out Form
- HAPs Guidance Updates
- Lessons learned in 2021EI
- Resource Info/ What's Next
- Q & A



EMISSION INVENTORY REGULATION/APPLICABILITY



EI REGULATORY BASIS

Regulations requiring GA EPD to collect an Emissions Inventory

- 1. Federal: 40 CFR Part 51 Subpart A 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

2022 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			
CO	≥ 2500			
Pb				
Primary PM ₁₀	≥ 250			
Primary PM _{2.5}	≥ 250			
NH ₃	≥ 250			



WHAT IS CAERS?



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 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



CAERS USER ROLES

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



CAERS USER ROLES

Certifier

- Can determine EI participation status via CAERS and/or prepare the emissions report
- Is authorized to certify the emissions report or opt 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. Note: CAERS certification is not a certification of the TRI submission. Toxics air data are certified in TRI-MEweb, not CAERS.



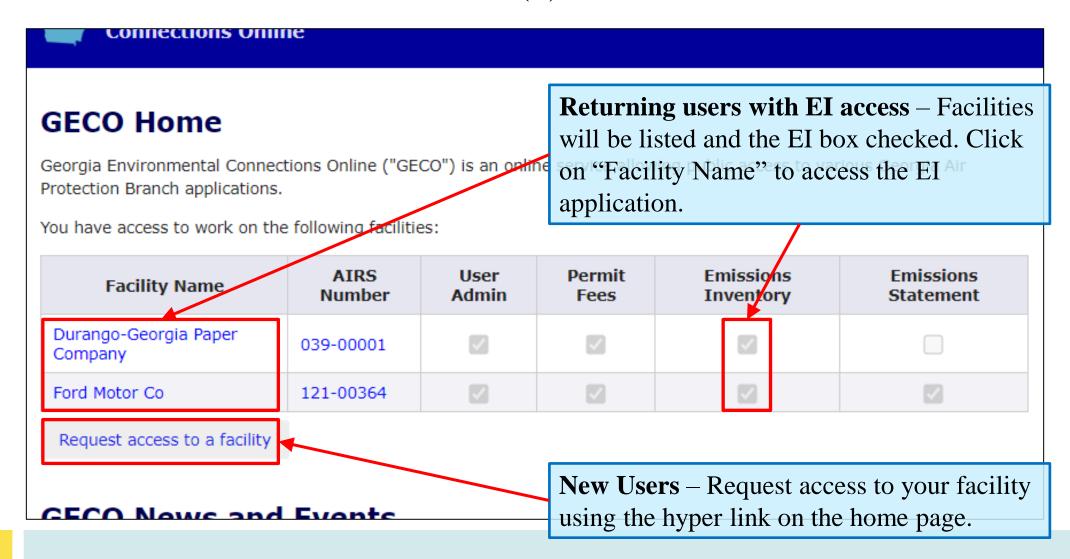
GECO EI APPLICATION WALKTHROUGH







ACCESS TO YOUR FACILITY (1)

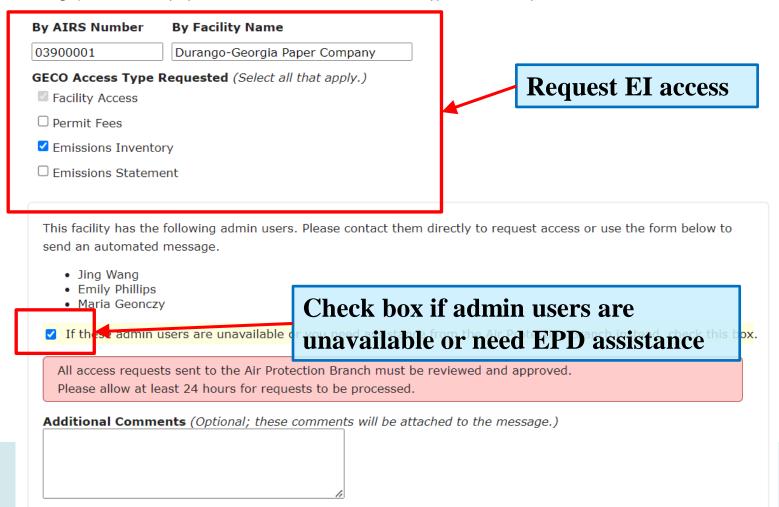




ACCESS TO YOUR FACILITY (2)

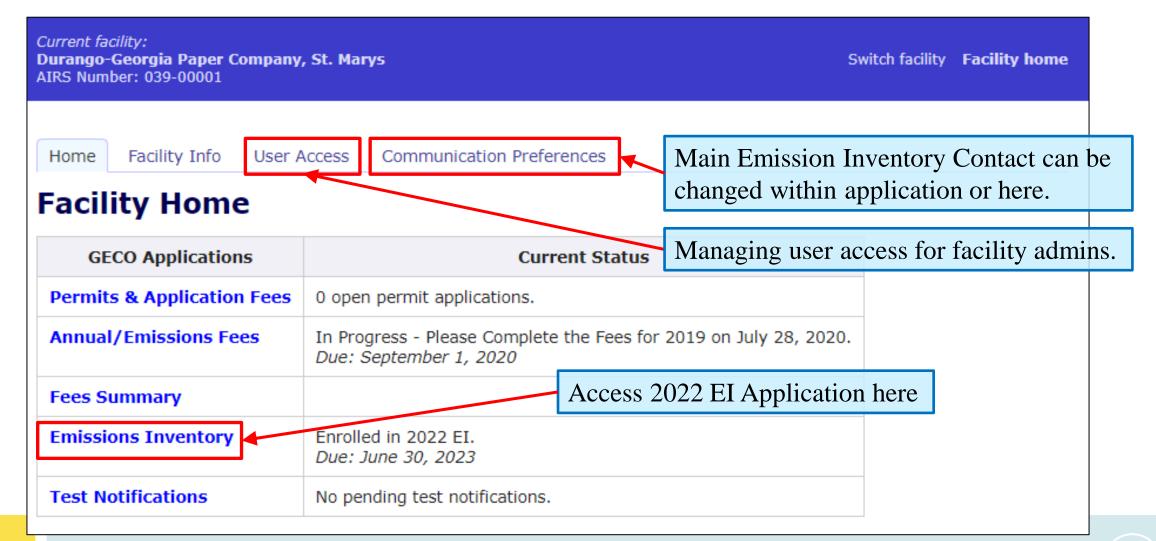
GECO Facility Access Request

To begin, find the facility by AIRS number or name and select the type of access requested.





APPLICATION STATUS MENU





Emissions Inventory

EI Home

Historical Data

Facilities whose potential emissions equal or exceed the thresholds indicated in the Air Emission Reporting Requirements (AERR) rule (40 CFR Part 51 Subpart A) must report their actual emissions annually or triennially. For assistance with calculating PTE, please use the <u>Potential to Emit Guidelines</u>. Since the 2019 Emissions Inventory, Georgia has used the <u>Combined Air Emissions Reporting System</u> (CAERS) developed by U.S. EPA to comply with the AERR.

Starting in 2023, 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.qa.gov.)

The next steps apply to all enrolled facilities:

- Review the basic <u>Facility Information</u> below and if there is any mistake, please let EPD know and we will verify the updates.
- 2. Update/verify 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 Emissions Inventory (EI) 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). There can only be one certifier per facility.

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

3. The opt-in/opt-out process will continue at EPA's Central Data Exchange (CDX). Click the green button below to start. Note that CAERS is not opening until February 6, 2023.

CDX is used to access CAERS. Once in CAERS, select your facility, then click on the "Create New Report" button for the 2022 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 qualifies to opt out, please download the <u>Opt-out form</u> to start your 2022 EI reporting. Upload the completed form to CAERS.

If new to CDX/CAERS, the preparer(s) and certifier you have specified should follow this procedure:

- a. Register in CDX using the link to EPA's CDX above and set up CAERS in CDX.
- b. Await email approval from CDX that their CAERS account is linked to the correct facilities.
- c. Once approved, select facility, then click on the "Create New Report" button for the 2022 Report.

Link to EPA CDX

Facility Information

If any facility information is incorrect, please email emissions.inventory@dnr.ga.gov.

Description

Kraft Pulp Mill



EI HOME PAGE

Emissions Inventory

EI Home

Historical Data

Historical Emission Inventory Data – data up to 2018 available on the GECO website. EI data from 2019 to present will be available in CAERS.

Facilities whose potential emissions equal or exceed the thresholds indicated in the Air Emission Reporting Requirements (AERR) rule (40 CFR Part 51 Subpart A) must report their actual emissions annually or triennially. For assistance with calculating PTE, please use the Potential to Emit Guidelines. Since the 2019 Emissions Inventory, Georgia has used the Combined Air Emissions Reporting System (CAERS) developed by U.S. EPA to comply with the AERR.

Step 1: Review facility information.

rocess will be as follows. Based on previously available information, the Email EPD if there is a mistake. If 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.)

The next steps apply to all envolled facilities:

Step 2: Verify or add your preparer(s) and certifier information.

- 1. Review the basic Facility Information below and if there is any mistake, please let EPD know and we will verify the updates.
- 2. Update/verify the CAERS Users tow. Please ensure all other contact information is correct.

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

a. A **preparer** is authorized to prepare an emissions (TDI) data for a given

Step 3: Verify any other contact information.



FACILITY INFORMATION

LITIK TO LITA COX

Facility Information

If any facility information is incorrect please email emissions.inventory@dnr.ga.gov.

Description

Kraft Pulp Mill

Step 1: Review facility

information NAICS Code

radic raip riii

tatus Operating as reported in 2020

* Operating status pertains only to the last Emissions Inventory reported

111110 - Soybean Farming

Site Address 4244 International Parkway Suite 120-test

ATLANTA, GA 30354

Geocoordinates 30.805990, -81.524999

Please contact us for any facility information discrepancy.



Open map in new window

CAERS Users

Use of CAERS requires one certifier and one or more preparers. If a single person serves





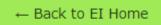
EI CONTACT INFORMATION – CAERS

← Back to EI Home **CAERS Users 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. Use of CAERS requires one certifier and one or A certifier has not been added. Use of CAERS requires one certifier. as both. A preparer has not been added. Use of CAERS requires at least one preparer **Current CAERS Users** Add New User None. O Preparer O Certifier O Both **CAERS Role** If a single person Honorific Edit CAERS Users First Name Maria serves both roles, Last Name Geonczy Title they must be added Company **Step 2:** Verify or add your as preparer and Mailing Address 4244 International Pkwy Suite 120 preparer(s) and certifier certifier. Atlanta City Georgia State information. Note that you can Postal Code 30354 change users at any time. **Phone Number Email** emissions.inventory@dnr.ga.gov Save Click to save and continue. **Current CAERS Users**

None.



EI CONTACT INFORMATION – CAERS



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 Suite 120 Atlanta, GA 30354	emissions.inventory@dnr.ga.gov		Edit Delete
Preparer	Ms Maria Geonczy	4244 International Pkwy Suite 120 Atlanta, GA 30354	emissions.inventory@dnr.ga.gov		Edit Delete

Add New CAERS User

Add additional preparers.

Modify current users.



EI CONTACT INFORMATION – OTHER

Starting in 2023, the new Emissions Inventory process will be as follows. Based on previously availab Georgia Air Protection Branch will enroll facilities that may need to participate in the Emissions Invent facility has not been enrolled, but you believe it should be participating in the EI, please en emissions.inventory@dnr.ga.gov.)

The next steps apply to all enrolled facilities:

- Review the basic <u>Facility Information</u> below and if there is any mistake, please let EPD know and updates.
- 2. Update/verify 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

Step 3: Verify any other contact information.

Durango-Georgia Paper Company, St. Marys AIRS Number: 039-00001			Switch facility		
Home Facility Info	User Access Com	munication Preferences			
Communicati	ion Preferen	ces / Edit			
Set your preferences for receiving communications from the Georgia Environmental Protection Division. Preferences can be set separately for each type of communication.					
Permit Fees	Edit Preferen	ces for <i>Emissions Inven</i>	ntory		
Permit Applications	Primary Contact				
Emissions Inventory	Salutation	Mrs	("Ms.", "Dr.", etc.)		
Emissions Statement	First Name	Jing			
Testing and Monitoring	Last Name	Wang	required		
	Title	Engineer			
	Organization				
	Street Address	4244 International Parkway Suite 120	required		
	Apt / Suite / Other				
	City	ATLANTA	required		
	State	GA	required		
	Postal Code	30354	required		
	Telephone Number	404-3636134	required		
	Primary Contact Email	jing.wang@dnr.ga.gov	required		
	Save Contact Info				



EI HOME PAGE – OPT-OUT FORM

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.

4. If your facility qualifies to opt out, please download the Opt-out form to start your 2022 EI reporting. Upload the completed form to CAERS.

If new to CDX/CAERS, the preparer(s) and certifier you have specified should follow this procedure:

- a. Register in CDX using the link to EPA's CDX above and set up CXERS in CDX.
- b. Await email approval from CDX that their CAERS account is linked to the correct facilities.
- c. Once approved, select facility, then click on the "Create New Report" button for the 2022 Report.

Link to EPA CDX

Facility Information

If any facility information is incorrect, please e

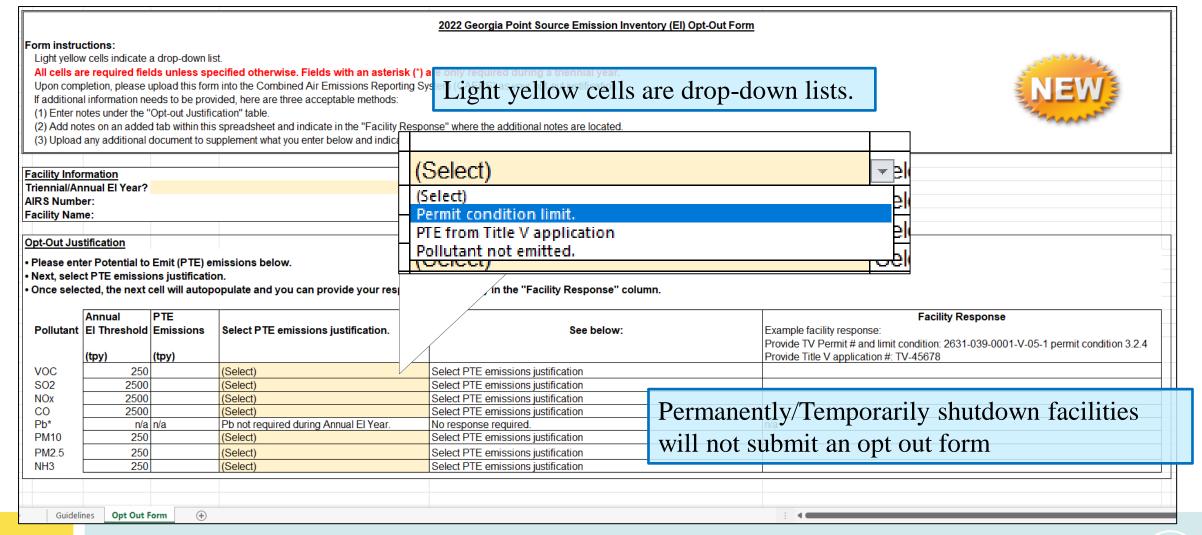
Description

Kraft Pulp Mill

Operating Title V facilities that do not qualify to participate in the annual EI must download Opt-Out form

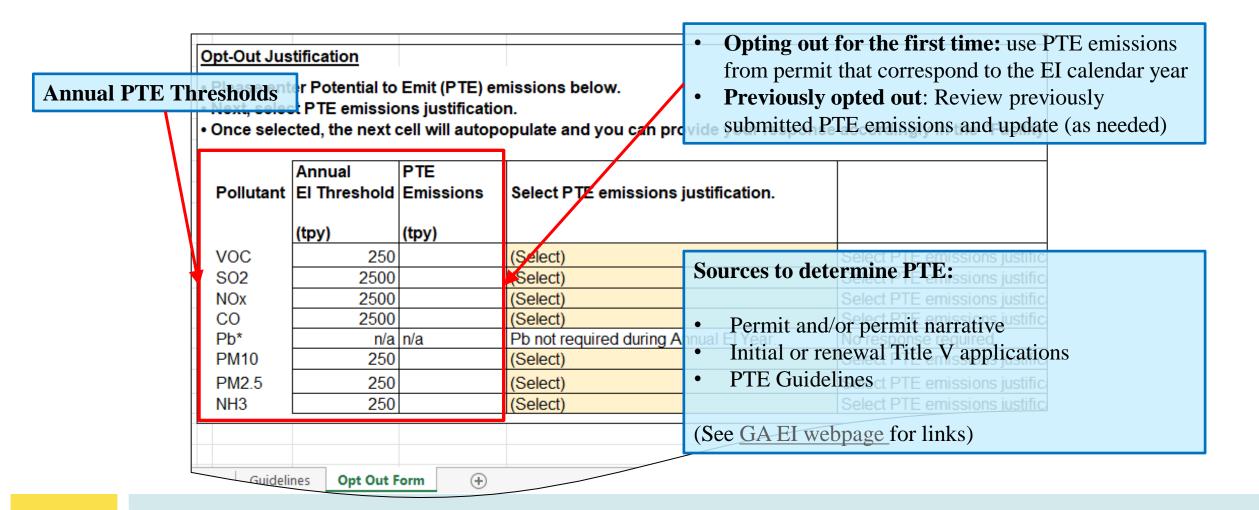


OPT-OUT FORM (1)





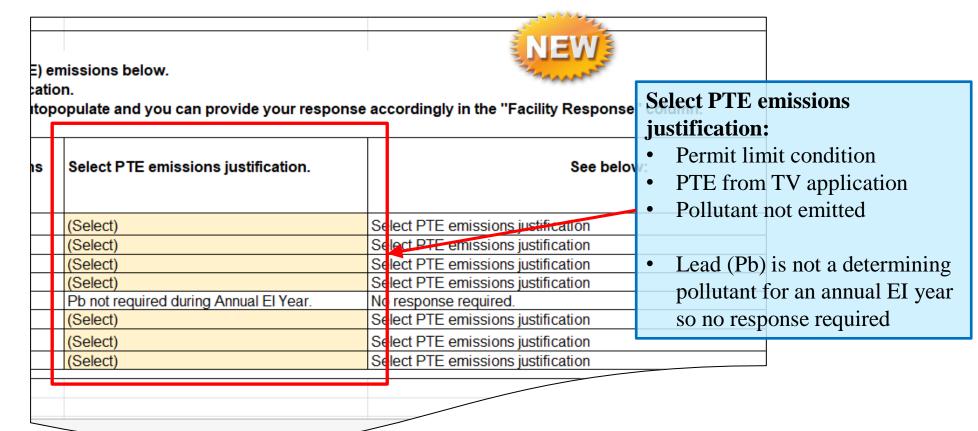
OPT-OUT FORM (2)





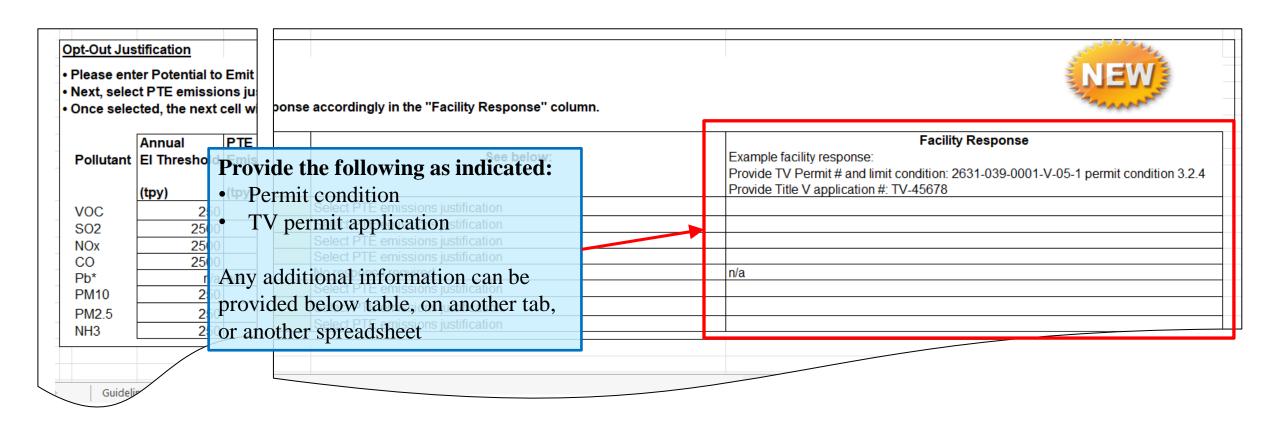
OPT-OUT FORM (3)

Opt-Out Justificatio Please enter Poter Next, select PTE e Once selected, the Annual Pollutant | El Thre (tpy) VOC S02 NOx CO Pb* PM10 PM2.5 NH3





OPT-OUT FORM (4)



There will be a short video of how to fill out an opt-out form.



EI HOME PAGE – LINK TO CDX

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 qualifies to opt out, please download the <u>Opt-out form</u> to start your 2022 EI reporting. Upload the completed form to CAERS.

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Link to EPA CDX

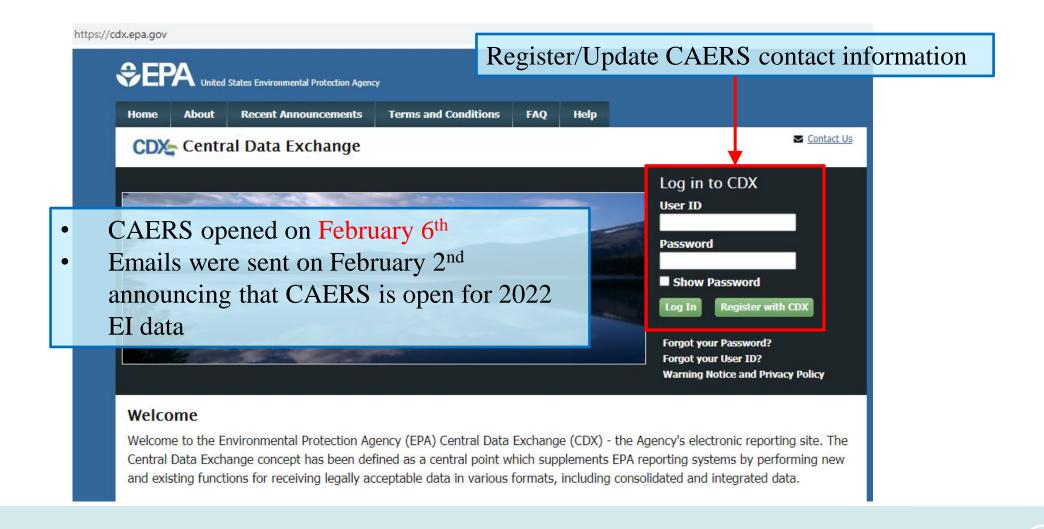
Facility Information

If any facility information is incorrect, please email emissions.inventory@dnr.ga.gov.

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



LINK TO CDX LOG IN





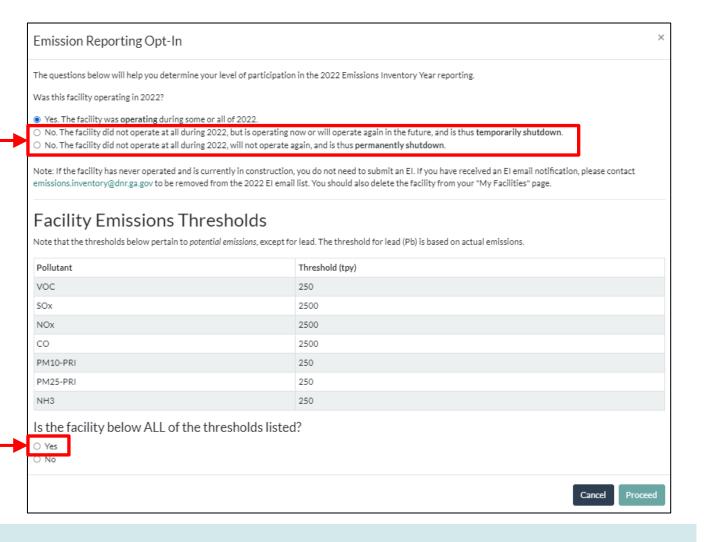
NEW CAERS FEATURES



NEW OPT-OUT PROCESS IN CAERS

Answering "No" to the first question will be directed to certify your report with no optout form needed.

Answering "Yes" to the second question will send you to the opt-out form that requires an attached opt-out form found through GECO.





NEW NAICS CODES

- For inventory year 2022, NAICS codes are being updated. This is part of the regular 5-year updates of NAICS codes.
- If you have an outdated NAICS, the system will indicate this to you.
- Georgia does not allow facilities to edit NAICS in GECO. If your facility has an outdated or incorrect NAICS, please reach out via emissions.inventory@dnr.ga.gov so we can make the correction before you certify and submit.



CAERS OPT-OUT/IN WALKTHROUGH



CAERS – OPT OUT



Facilities that
never operated or
currently in
construction, do
not need to submit
an EI

Emission Reporting Opt-In

The questions below will help you determine your level of participation in the 2022 Emissions Inventory Year reporting.

Was this facility operating in 2022?

- Yes. The facility was operating during some or all of 2022.
- O No. The facility did not operate at all during 2022, but is operating now or will operate again in the future, and is thus temporarily shutdown.
- O No. The facility did not operate at all during 2022, will not operate again, and is thus permanently shutdown.

Note: If the facility has never operated and is currently in construction, you do not need to submit an Er. If you have received an Er email not incation, prease contact emissions.inventory@dnr.ga.gov to be removed from the 2022 El email list. You should also delete the facility from your "My Facilities" page.

Facility Emissions Thresholds

Note that the thresholds below pertain to potential emissions, except for lead. The threshold for lead (Pb) is based on actual emissions.

Pollutant	Threshold (tpy)	Threshold (tpy)	
VOC	250		
SOx	2500		
NOx	2500	Statement that avalaing your	
CO	2500	Statement that explains your	
PM10-PRI	250	selection and next steps.	
PM25-PRI	250	1	
NH3	250		

Is the facility below ALL of the thresholds listed?



O No

This facility will be "Operating" below the AERR thresholds for the 2022 inventory year and will not submit an emissions Inventory Report this year. You will now be redirected to the submission screen where you must provide your PTE analysis and certify your report.



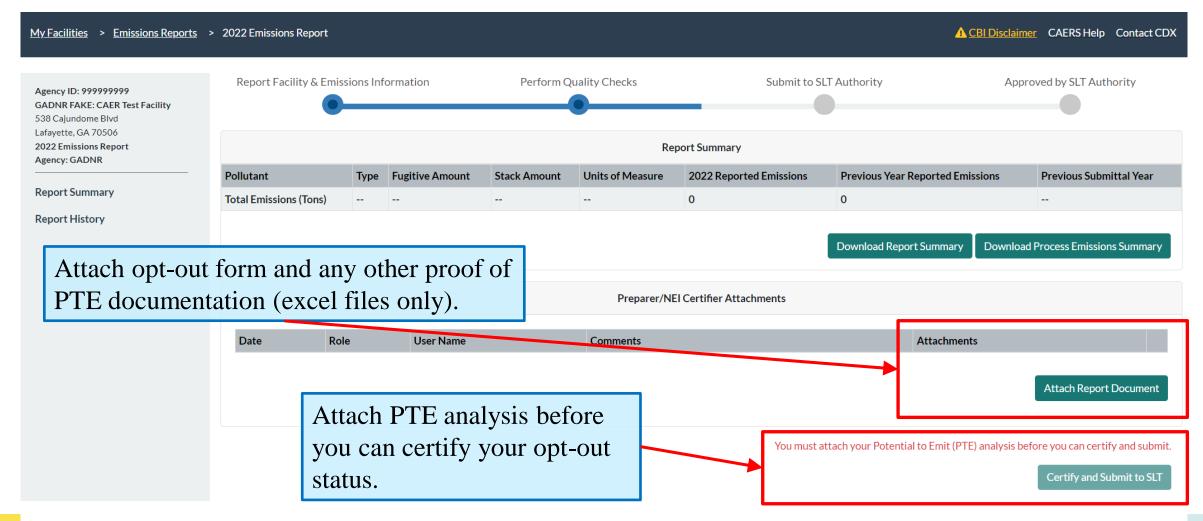
Proceed

Opt-out scenarios

- Operating but under thresholds
- Temporarily/
 Permanently
 Shutdown all of 2022

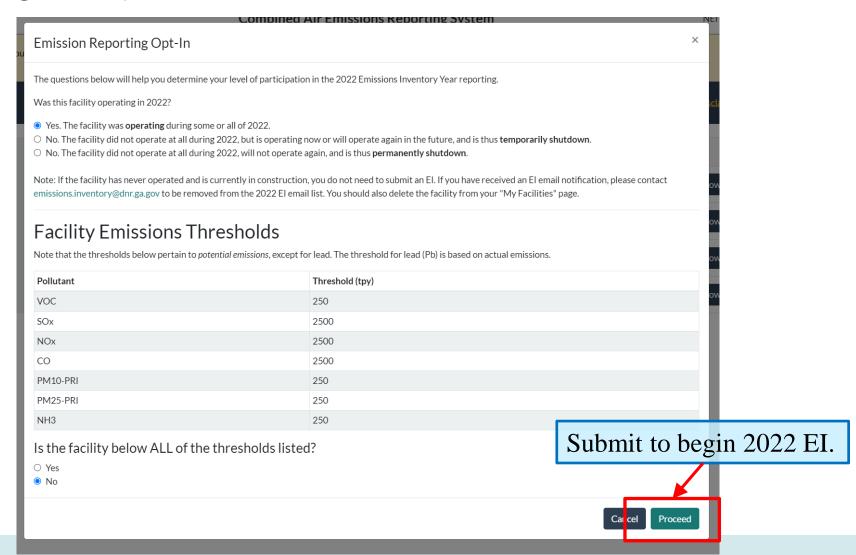


CAERS – OPT OUT





CAERS – OPT IN





GEORGIA INTERNAL QA CHECKS



GEORGIA INTERNAL QA CHECKS (1)

Opt out status review

- Verify shut-down status (no form required)
- Review opt out form for operating and below AERR annual thresholds

Control units

- Applicable permit and previous CAERS entry
- Quality Check Run Results: Warning review
- Co-located facilities
 - Each co-located facility must report if collectively PTE thresholds are exceeded



GEORGIA INTERNAL QA CHECKS (2)

Emissions Data

- Facility-wide CAP pollutants totals ≥ 100 tpy
 - Calculations for process level emissions data are checked for correctness and reproducibility
- Facility-wide CAP pollutants totals increase/decrease of >20% from previous year
 - Reasons that the total emissions are increased or decreased > 20%
- PM2.5 check for facilities in the following counties: Bibb, Chatham, Clarke, Dougherty, Fulton, Glynn, Hall, Houston, Lowndes, Muscogee, Richmond, Washington and Dade, Walker, and Catoosa (counties near Chattanooga)
- Lead (Pb) If Pb is emitted, it must still be reported annually

Possible HAPs QA checks if reported

- Total HAPs emissions increased or decreased >10%
- The reason for such difference of total HAPs



HAPS GUIDANCE UPDATES



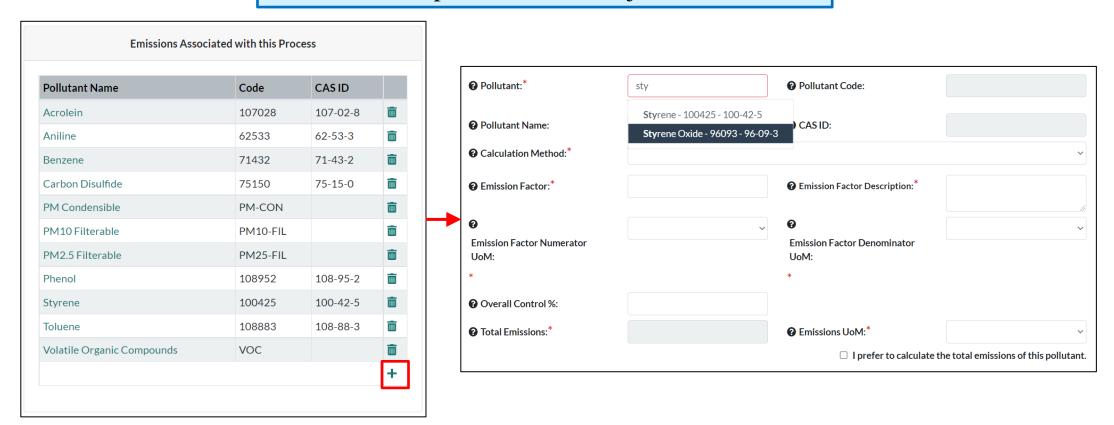
HAPS PILOT PROGRAM

- Georgia EPD is in the stakeholder process about planning to recommend the Board of Natural Resources to adopt regulations requiring HAPs reporting in the future.
- The 2023 HAP pilot program is currently recruiting. Participating in the pilot program will allow input into implementation and guidance process, including reporting thresholds and exemptions.
- If your facility has HAPs emissions and is interested in knowing more, send an email to emily.phillips@dnr.ga.gov with "HAPs Pilot Program" as the subject.
- We are continuing to encourage facilities to voluntarily report HAPs in CAERS.
 Benefits of reporting HAPs include:
 - Regular HAP-focused help sessions for facilities that want to voluntarily report.
 - HAPs data reported to CAERS could be used to pre-populate Toxics Release Inventory (TRI) air toxics emissions



HAPS GUIDANCE

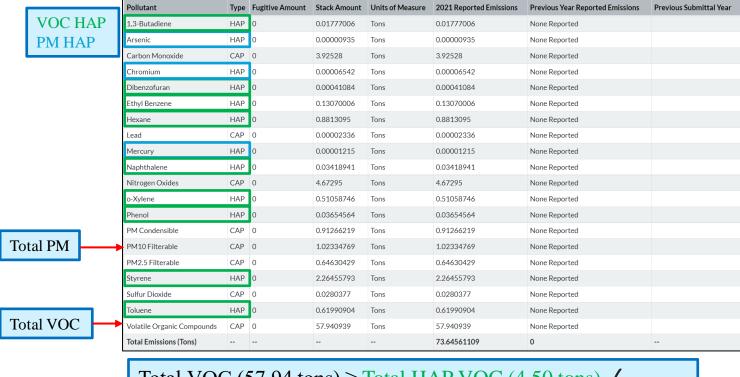
HAPs can be reported in CAERS just like CAPS.





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.



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.



LESSONS LEARNED FROM 2021EI



LESSONS LEARNED FROM 2021 EI

Errors

- Fuel usage value
 - If process has same unit between the throughput and fuel usage, the value should be same.
- Process or Unit is operating but no emissions reported
 - If process or unit is operating, reporting detail including emissions need be reported
- Heat content
 - Check CAERS User Guide Appendix C.1 for units and referring values

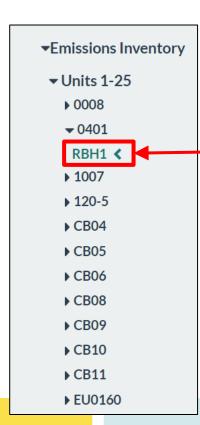
Triennial Emissions data

- EPA released triennial 2020 EI data this Feb.
- Any reported emissions over annual Threshold, facility need opt-in Annual cycle
- If lead is over 0.5 TPY in triennial cycle, lead emissions need be added to EI.

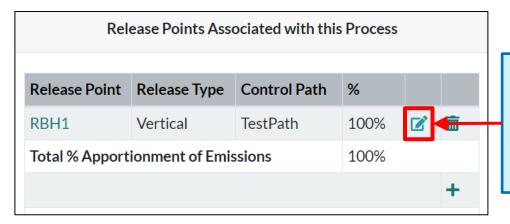


REVIEW OF HOW TO CORRECT CONTROLS ERROR & WARNING

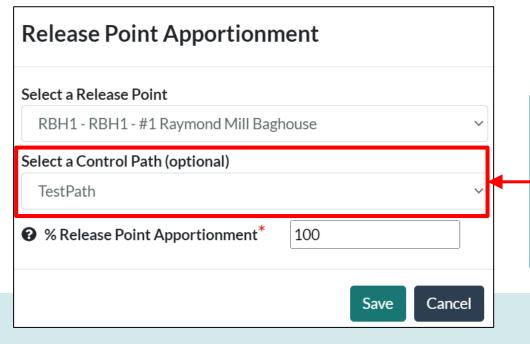
Controls are added to a device through the process page.



1. Processes can be found through the "Emissions Inventory" menu on the left-hand side under the control device listed.



2. Find the "Release Points Associated" section and select the edit button.



3. Add control path in the "Release Point Apportionment" menu.



RESOURCES AND NEXT STEPS



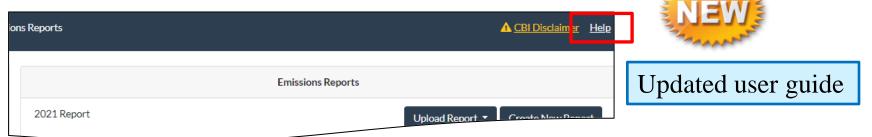
GECO EI Application Training PowerPoint and Recording

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

CAERS User guide

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

Can also be accessed from within CAERS



Past EPA CAERS Webinar Recordings

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

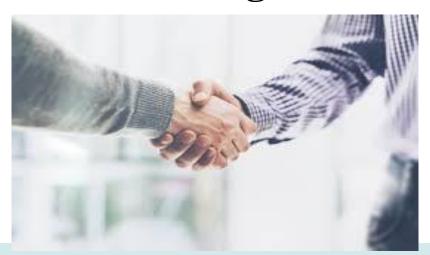


WHAT'S NEXT?

- EPA Training (January and February 2023)
 - CAERS EI User Interface
 - CAERS EI Bulk Uploading Template
 - CAERS EI Control Path
 - Please visit https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers to view the training recordings.
- Live Virtual Help Sessions (Every Tuesday/Thursday from April July)
- Georgia EPD will QA the EI data as soon as it is submitted
- Georgia EPD might reach out to the QA'd facilities after June 30 or after we QA the EI data about the errors or data verifications



Your efforts are very appreciated. You help us reach our goal of obtaining and maintaining an accurate emissions inventory 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

