

# 2023 Emission Inventory Kickoff Training (GECO/CAERS Updates) – Attendee Questions

## Facility Enrollment/Notification Process

- Q1. Email notifications come to me stating it affects "your facility". I have several GA facilities. Is there any way to ID which facility is being referenced in the e-mail?
- A1. Normally our EI related emails include facility's AIRS NO. and the facility name. The following screenshot shows the last email we sent related to the 2023 EI training, the first line of the email indicated the facility name and its AIRS NO.

**2023 Georgia Point Source Emission Inventory Submittal: 003-00013 - Langboard Willacoochee**

If the notification does not identify the facility, please email [emissions.inventory@dnr.ga.gov](mailto:emissions.inventory@dnr.ga.gov) and we will clear this up.

- Q2. If GA agrees we "opt out", why do we need to go in and enter that info into CAERS?
- A2. Currently, CAERS is set up so that an opt-out response is required from the facility. We have been working towards making the opt-out process more streamlined in the future.

## Emissions Reporting

- Q3. Are there emissions factors that provide the means to differentiate between PM, PM10, and PM2.5?
- A3. Yes. CAERS requires reporters to report PM as PM10 primary, PM10 filterable, PM2.5 primary, PM2.5 filterable, and PM condensable.

GA EPD prefers facilities to report as PM10 filterable, PM2.5 filterable, and PM condensable. If these values are available to you, PM10/2.5 primary is not required. However, oftentimes these emission factors are not available to you due to available data or source testing method. In this case, PM10/2.5 primary can be selected.

When choosing an emission calculation method in CAERS, and you select from the USEPA emission factors, PM10/PM2.5 primary and filterable and PM condensable emission factor options are available depending on USEPA's endorsement.

- See Section 4.3.2.2 "Entering and Calculating Emissions" in the CAERS User Guide V4 (<https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers>)
- "The list of EPA emission factors in CAERS may not contain factors listed in WebFIRE if those factors are of a quality "U". CAERS Version 4 will show if an emission factor has been revoked, and is thus, no longer appropriate to use."
- If you believe a retired or non-endorsed emission factor is the best available emission factor to use, select "Other Emission Factor" as your calculation method and provide any explanation if possible.

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Helpful emission factor resources:

- <https://www.epa.gov/air-emissions-factors-and-quantification>
- <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-Compilation-air-emissions-factors>
- <https://cfpub.epa.gov/webfire/>

Q4. Does GA EPD still consider that using PM10 = PM2.5 is still acceptable?

A4. Yes, GA EPD will accept PM10=PM2.5 if no other data is available.

Q5. We use thousands of different chemicals with varying densities, VOC contents, etc. (paints, sealants, solvents, glues, chemical products, etc.) that are pulled from unique SDSs. Are you wanting a table with all the values that would back up what was used in the calculations?

A5. A table with all the values can serve as back up with representative calculations for the different types of mass balances. Please provide the corresponding process (SCC) for each representative calculation.

We can work with you to figure out the best way to present your data in CAERS. Please send an email to [emissions.inventory@dnr.ga.gov](mailto:emissions.inventory@dnr.ga.gov) with facility's AIRS No and family name.

Q6. We use a SQL Server database to keep track of all the usage and associated parameters that go into calculating emissions. Can we simply use emissions reports from that database as backup?

A6. Emission reports help if we can see material balance data so that they can be reproduced.

We can work with you to figure out the best way to present your data in CAERS. Please send an email to [emissions.inventory@dnr.ga.gov](mailto:emissions.inventory@dnr.ga.gov) with facility's AIRS No and family name.

Q7. Have the bulk upload templates been changed since last year? (ie is the current year compatible with last year?)

A7. The bulk upload templates should not have changed. However, it is recommended by EPA to download the bulk upload template file that is made available when the 2023 EI report is started. This file will have all the latest bug fixes and any format fixes along with previous year data.

- i. Read more about the bulk upload template in the User Guide V4. (<https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers>) The following excerpts are from "Section 5.1 The Bulk Upload Excel Template."

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- ii. “Before you download your excel template, if you have submitted a previous year report, we strongly encourage you to run the Quality Checks via the user interface. Doing so will alert you to any new QA checks that have come online since your previous report, and you will be able to address these errors while creating your new report. Failing to do so may result in rework of your template and more than one upload attempt.”
- iii. When you do go to download the template, the first tab of the spreadsheet “shows the version of your template, the date the version of the template was updated, some general instructions, as well as a list of recent changes from a previous version. You should make sure that you download your previous year data in the most recent version of the workbook available in CAERS. Using a workbook from a previous year report, for example, will cause errors in upload, further QA checks, and a potential rejection due to an incomplete submission further down the process. Versioning of workbooks is kept at a minimum during reporting, but updates do happen. When they do, it is recommended you upload your report with changes you have already made, and then download your report again, in the new template, to continue reporting. This helps ensure that you have an updated version of the template, which may prevent errors in future.”

### HAPs

Q8. Have the thresholds been decided for HAPs?

A8. The proposed thresholds can be found in Table 1B to Appendix A of Subpart A of the AERR proposed rule revisions. This is found in [88 FR 54118](#) on [page 54213](#) specifically. These are proposed thresholds and not final.

Q9. Is there a de minimis value for HAPs?

A9. Currently there is not a de minimis for reporting in CAERS. A de minimis may be added in a revision in the proposed AERR. GA EPD is also working on developing a de minimis for voluntary reporting.

Q10. Since HAPs are currently voluntarily reported, will GA EPD internally calculate expected HAPs for facilities?

A10. No. GA EPD will not internally calculate any HAPs that are not reported but expected for a facility. However, US EPA will perform HAPs augmentation when it publishes its final emissions inventory so it is recommended for facilities to perform their own calculations and report HAPs in order to prevent any inaccurate data.

### Resources

Q11. Where can we find the recording for this training?

A11. <https://epd.georgia.gov/forms-permits/air-protection-branch-forms-permits/point-source-emissions-inventory#toc-training-resources-2>