



WELCOME TO THE GA EPD HAPS INVENTORY STAKEHOLDER MEETING

- **The stakeholder meeting will begin in a few minutes...**
- **Please keep your video and audio off for the duration of the presentation.**
- **There will be a discussion toward end of the presentation to allow for audience participation and feedback.**
- **If you'd like to make a comment during this time, please virtually raise your hand by using the Reactions menu at the bottom of the Zoom screen and select "Raise Hand".**
- **This presentation will be recorded and posted online.**



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

GA EPD HAPs Inventory

Tamara Hayes, ECSU Manager

Emissions & Control Strategies Unit (ECSU)

Planning & Support Program

Air Protection Branch

Stakeholder Meeting

February 28, 2023



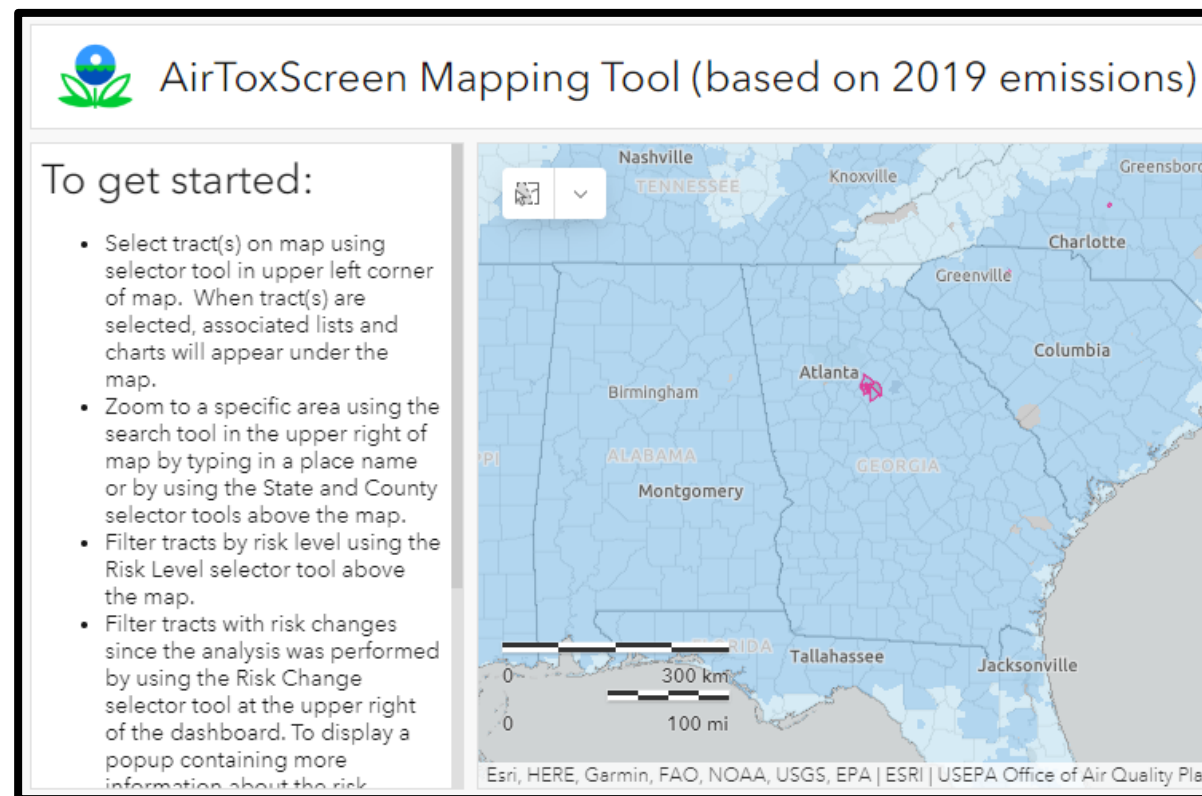
OUTLINE

- Reasons for a GA HAPs Inventory Proposal
- HAPs Inventory Overview
- HAPs Pilot Program
- Proposed Timeline for Implementation
- Points of Discussion



WHY DOES GA NEED A HAPS INVENTORY?

- Since the release of AirToxScreen (previously NATA), attention to the risks associated with HAP emissions has increased on a national level.
- Develop Georgia-specific HAPs emissions data.
- Evaluate EPA HAPs inventory and risk estimates for accuracy.
- Georgia is one of the only southeastern states that does not require submittal of HAPs emissions inventory data.
- EPA has plans to make HAPs reporting a federal requirement.





WHY NOT USE TRI DATA?

Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals on a facility level.

- TRI is not reviewed by EPD
- Only certain facilities are required to report
- TRI only contains facility level emissions
- Over-reporting is common in TRI due to
 - Rounding up
 - Worst case estimates
- TRI does not contain all HAPs or specific HAP speciation



HAP AUGMENTATION

- EPA takes criteria air pollutant (CAP) data from the National Emissions Inventory (NEI) and applies HAP augmentation to estimate HAPs emissions from facilities.
- HAP augmentation is calculated based on ratios found in EPA's emission factors database, WebFire.
 - This does not account for all industry activities.
- HAP augmentation is often inaccurate and based on outdated or low-quality emissions factors.

facility_id	program_cd	alt_agency_id	emis_unit_id	agency_unit_id	unit_type_cd	emis_process_id	agency_process_id	scc	facility_name	emissions_comment	data_set_short_name	pollutant_cd	description	total_emissions	units
16323811	AZDEQ	6081	103915513	2	999	149324914	1		20100201 GRIFFITH ENERGY LLC	Emission mul	2014EPA_HAPAug	100414	Ethyl Benz	59.1238	LB
16323811	AZDEQ	6081	103915413	1	999	149324814	1		20100201 GRIFFITH ENERGY LLC	Emission mul	2014EPA_HAPAug	100414	Ethyl Benz	37.7904	LB
16323811	AZDEQ	6081	103915413	1	999	149324814	1		20100201 GRIFFITH ENERGY LLC	Emission mul	2014EPA_HAPAug	107028	Acrolein	7.55804	LB
16323811	AZDEQ	6081	103915513	2	999	149324914	1		20100201 GRIFFITH ENERGY LLC	Emission mul	2014EPA_HAPAug	107028	Acrolein	11.82468	LB
16323811	AZDEQ	6081	103915413	1	999	149324814	1		20100201 GRIFFITH ENERGY LLC	Emission mul	2014EPA_HAPAug	108883	Toluene	153.524	LB
16323811	AZDEQ	6081	103915513	2	999	149324914	1		20100201 GRIFFITH ENERGY LLC	Emission mul	2014EPA_HAPAug	108883	Toluene	240.19	LB
16323811	AZDEQ	6081	103915513	2	999	149324914	1		2014AZDEQ			120127	Anthracen	0.0024	LB
16323811	AZDEQ	6081	103915613	3	999	149325014	1		10300602 GRIFFITH ENERGY LLC		2014AZDEQ	120127	Anthracen	0.000036	LB



IMPROVE DATA QUALITY

CURRENT PROCEDURE

HAPs data used in EPA risk estimates comes from TRI and EPA's augmentation process.

EPD contacts facilities whenever EPA requests verification of data for risk assessments.

EPD suggests corrections to EPA.

PROCEDURE WITH A HAPS INVENTORY

→ Data would come primarily from the Georgia HAPs inventory.

→ Data is already verified by EPD during the emissions inventory submittal process.

→ EPD has already reviewed and approved data before it is included in EPA databases.



FACILITIES APPLICABLE TO HAPS INVENTORY

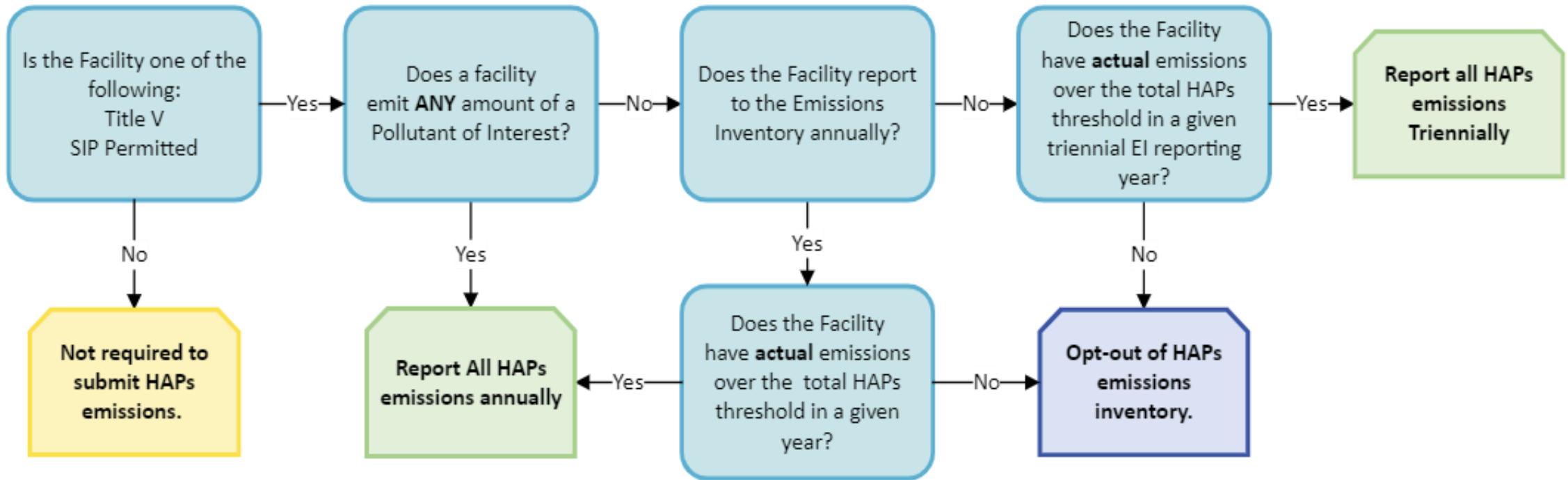
- A HAPs inventory would apply to permitted facilities that are:
 - Title V sources
 - SIP sources
- Sources that emit HAPs below the reporting threshold would be eligible to opt-out of the inventory.
- Sources that submit CAP emissions data annually would submit HAP emissions data annually

Table 1. Estimated Facilities Affected by HAPs Inventory

Source Type	Annual Submittal	Triennial Submittal
Title V	120	320
SIP Permitted	0	383
Total	120	703



WHO WOULD REPORT?



- Current threshold being considered is 0.2 tons per year (TPY) of total actual HAPs emissions in a given inventory year.
- Pollutants of Interests are defined on the next slide.



OTHER REPORTING CONSIDERATIONS

POLLUTANTS OF INTEREST

- Pollutants of interest (POI) are pollutants that must be reported regardless of amount emitted.
- Examples of Potential POI:
 - Ethylene Oxide
 - Hexavalent Chromium
 - Mercury

EXEMPTIONS

- Exempted activities being considered:
 - For discussion



HAPS REPORTING IN CAERS

- GA EPD currently uses the Combined Air Emissions Reporting System (CAERS) for submittal of the CAP emissions inventory data to EPA.
- CAERS is equipped to handle HAP emissions reporting (no additional platform)

Pollutant	Type	Fugitive Amount	Stack Amount	Units of Measure	2020 Reported Emissions	Previous Year Reported Emissions	Previous Submittal Year
Ammonia	CAP	0	3.4959	Tons	3.4959	3.4959	2019
Carbon Monoxide	CAP	0.00295	312.33675	Tons	312.3397	312.3397	2019
Formaldehyde	HAP	0	0.00405	Tons	0.00405	None Reported	
Lead	CAP	0	0.0289	Tons	0.0289	0.0289	2019
Nitrogen Oxides	CAP	2.2725	1599.7075	Tons	1601.98	1601.98	2019
PM Condensable	CAP	0	81.823	Tons	81.823	81.823	2019
PM10 Filterable	CAP	0	0.4908	Tons	0.4908	0.4908	2019

- Regular help sessions are available to facilities to complete their report in CAERS.
- Can import HAPs data from CAERS to TRI- MEweb once certified by facility.

NEI Data Available

We have detected that your facility has filed a National Emission Inventory (NEI) report in CY 2019. The data below represents the most recent NEI data submitted in last three year. Click Yes to copy your NEI Point and Non-point source emission data into Section 5.1 and 5.2 on your TRI form R.

NEI Submission Calendar Year: 2019
NEI Submission Status: SUBMITTED
NEI Submission Certification Date: 01/21/2020
Facility Name Reporting to NEI: Texpar Energy LLC
EPA Registry ID : 110002102368
TRI Facility ID (TRIFID): 31717TXPRN268IN
Non-Point Source release amount reported in CY 2019 to NEI (lbs): 0
Point Source release amount reported in CY 2019 to NEI (lbs): 6.992

Yes, copy my CY 2019 NEI emission data into Section 5.1 (Fugitive or Non-Point Air Emissions) and 5.2 (Stack or Point Air Emissions)
No, I will report a different amount to TRI in Section 5.1 and 5.2
No, this is not my facility, therefore, will not use these amounts in Section 5.1 and 5.2



HAPs PILOT PROGRAM OVERVIEW

- EPD conducted a pilot program for voluntary HAP emissions data submittals and feedback for the 2021 emissions inventory.
- Six facilities participated representing the following industries:
 - Pulp and paper
 - Painting and Coating
 - Automotive manufacturing
 - Beverage manufacturing
 - Chemical manufacturing
- EPD is currently recruiting volunteer facilities for the 2022 emissions inventory year. If you wish to participate, please email emily.phillips@dnr.ga.gov.



HAPS PILOT LESSONS LEARNED

- Companies that operate in other states have given us insight into how other states operate their HAPs inventory
- Time spent entering HAP emissions in CAERS ranged from 15 minutes to 6 hours depending on size and operations of the facility.
 - This effort will decrease in following years as updating emissions require less effort than initial creation.



TENTATIVE TIMELINE FOR IMPLEMENTATION

February 28, 2023	Initial stakeholder meeting
March 15, 2023	Initial comments from stakeholder are received
April-May 2023	Second Stakeholder Meeting
Sept 2023	Brief the DNR Board on a proposed rule addition in section 391-3-1-.02(6).
October – November 2023	Public comment period and public hearing
January 2024	Request the DNR Board adopt the proposed rule revisions



TENTATIVE TIMELINE FOR IMPLEMENTATION, CONTINUED

June 30, 2025	Submittal of first HAP emissions data starting in 2024 inventory year for the Title V sources that submit CAP emissions data annually.
June 30, 2027	First triennial reporting year for the other Title V sources and SIP permitted sources to submit HAP emissions data.



OTHER CONSIDERATIONS

- EPA's Planned Revisions to the Air Emissions Reporting Requirements
- From the Fall 2022 Unified Agenda of Regulatory and Deregulatory Actions:
 - EPA is "considering how to improve the quality and completeness of hazardous air pollutant (HAP) emissions from stationary sources..." and "Requiring HAPs for point sources is essential to addressing continued public health risks and environmental justice issues."
 - NPRM: May 2023
 - Final Rule: October 2024



POINTS OF DISCUSSION



POINTS OF DISCUSSION

- Proposed reporting threshold of 0.2 TPY total actual HAP emissions.



POINTS OF DISCUSSION

- Considering de minimis values for insignificant emission levels.



POINTS OF DISCUSSION

- Is it desirable to prepopulate expected HAPs for facilities based on NAICS in CAERS for ease of initial setup?



POINTS OF DISCUSSION

- What would be useful as training and guidance materials?



POINTS OF DISCUSSION

- Appropriate exemptions?



QUESTIONS

General Questions?





CONTACT INFORMATION

Emily Phillips

**Georgia Dept. of Natural Resources
4244 International Parkway, Suite 120
Atlanta, GA 30354**

emily.phillips@dnr.ga.gov

(470)251-4176

To access the recording, please visit:

<https://epd.georgia.gov/haps-inventory>