



WELCOME TO THE 2024 EI TRAINING!

The training will begin in a few minutes...

- **Please keep your video off and voice muted for the duration of the presentation.**
- **If using a phone, please use the phone number listed in the teams meeting**
- **If you have any questions, please write them in the chat box**
- **There will be a Q&A session at the end of the presentation**
- **Use *9 to raise your hand via the phone line**
- **This training will be recorded and posted online. More info covered on Resources slide.**

NOTE: EPD welcome facilities to voluntarily report HAP emissions in addition to the criteria air pollutants.



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

2024 GA Kickoff Point Source Emission Inventory Training

Ruben Gijon-Felix, ECSU Manager

Maria Geonczy

Emily Phillips

Planning & Support Program

Air Protection Branch

Georgia Environmental Protection Division

**2024 EI Point Source Emission Reporting
Training Webinar**

December 11, 2024



TRAINING OUTLINE

- **Regulatory Background**
- **Update on Proposed Air Emissions Reporting Requirements**
- **Combined Air Emissions Reporting System**
- **HAPs Guidance Updates**
- **Submittal Walkthrough**
- **Georgia Quality Assurance**
- **Helpful Tips**
- **Resources and Next Steps**



EMISSION INVENTORY REGULATION/APPLICABILITY



EI REGULATORY BASIS

Regulations requiring GA EPD to collect 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.

GECO is updated for 2024 EI; CAERS will reopen January. 6, 2025. GA EPD requires participating facilities to report data by **June 30th**. **No extensions will be provided after July 15th.**



APPLICABILITY

All Part 70 Major Sources are subject.

- Exceptions include:
 - Permitted but not constructed facilities
 - Facilities with Federally Enforceable Permit Limits (e.g., Synthetic Minor or Major HAP sources)
 - Facilities which were shutdown during the entire calendar year

2024 EI Year is an Annual Year

1. Annual thresholds are higher than triennial Year thresholds
2. Thresholds are PTE-based except for Lead

Annual PTE Thresholds	
Pollutant	(tons per year)
SO ₂	≥ 2500
VOC	≥ 250
NO _x	≥ 2500
CO	≥ 2500
Pb	N/A
Primary PM ₁₀	≥ 250
Primary PM _{2.5}	≥ 250
NH ₃	≥ 250



NEW PROPOSED AERR



PROPOSED AERR PROVISION RELATED TO POINT SOURCES

On July 25th, 2023, EPA published a draft of a new proposed **Air Emissions Reporting Requirements (AERR)**. **Comment period ended on Nov. 17, 2023.**

Proposal includes:

- New deadline for CAPs reporting: Proposed new deadline March 31, 2031
- Mandatory HAPs reporting: All speciated HAPs emitted for TV sources
- Change in reporting thresholds. No triennial year reporting, every year will have the same (previously the annual/triennial) threshold.
- New data collection requirements for small generating units, mobile sources and portable sources
- **Emissions data** not entitled to confidential treatment
- Require to use electronic reporting to submit certain source tests





WHAT IS CAERS



GA EPD USES CAERS FOR THE PS EI

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

Role	Description	Number per Facility	Create Initial Report	Certify Report
Preparer	Prepares an emissions report for a facility (e.g., consultant, staff person working for the facility).	Multiple	Yes	No
Certifier	Certify the emissions report or opt out of the EI to meet your legal obligation for reporting to your SLT.	Only one	Yes	Yes

Note: An individual preparer or certifier account can be associated with more than one facility.



HAPS GUIDANCE UPDATES



HAPS PILOT PROGRAM

- Since the recent proposal of the new AERR, Georgia EPD has been working on modifying the approach to the planned GA HAPs inventory.
- Until 2026, Georgia will still collect voluntary HAP reporting from facilities.
- The 2024 HAP pilot program will focus on voluntary reporting and feedback about the reporting process and timelines.
- Total toxics air emissions are made available for TRI-MEweb once the facility has certified the report in CAERS.



HAPS GUIDANCE

HAPs can be reported in CAERS just like CAPS.

Emissions Associated with this Process

Pollutant Name	Code	CAS ID	
Acrolein	107028	107-02-8	🗑️
Aniline	62533	62-53-3	🗑️
Benzene	71432	71-43-2	🗑️
Carbon Disulfide	75150	75-15-0	🗑️
PM Condensable	PM-CON		🗑️
PM10 Filterable	PM10-FIL		🗑️
PM2.5 Filterable	PM25-FIL		🗑️
Phenol	108952	108-95-2	🗑️
Styrene	100425	100-42-5	🗑️
Toluene	108883	108-88-3	🗑️
Volatile Organic Compounds	VOC		🗑️
			+

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

? Pollutant:* ?
 ? Pollutant Name: Styrene - 100425 - 100-42-5
 Styrene Oxide - 96093 - 96-09-3

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	Type	Fugitive Amount	Stack Amount	Units of Measure	2021 Reported Emissions
1,3-Butadiene	HAP	0	0.01777006	Tons	0.01777006
Arsenic	HAP	0	0.00000935	Tons	0.00000935
Carbon Monoxide	CAP	0	3.92528	Tons	3.92528
Chromium	HAP	0	0.00006542	Tons	0.00006542
Dibenzofuran	HAP	0	0.00041084	Tons	0.00041084
Ethyl Benzene	HAP	0	0.13070006	Tons	0.13070006
Hexane	HAP	0	0.8813095	Tons	0.8813095
Lead	CAP	0	0.00002336	Tons	0.00002336
Mercury	HAP	0	0.00001215	Tons	0.00001215
Naphthalene	HAP	0	0.03418941	Tons	0.03418941
Nitrogen Oxides	CAP	0	4.67295	Tons	4.67295
o-Xylene	HAP	0	0.51058746	Tons	0.51058746
Phenol	HAP	0	0.03654564	Tons	0.03654564
PM Condensable	CAP	0	0.91266219	Tons	0.91266219
PM10 Filterable	CAP	0	1.02334769	Tons	1.02334769
PM2.5 Filterable	CAP	0	0.64630429	Tons	0.64630429
Styrene	HAP	0	2.26455793	Tons	2.26455793
Sulfur Dioxide	CAP	0	0.0280377	Tons	0.0280377
Toluene	HAP	0	0.61990904	Tons	0.61990904
Volatile Organic Compounds	CAP	0	57.940939	Tons	57.940939
Total Emissions (Tons)	--	--	--	--	73.64561109

Total PM →

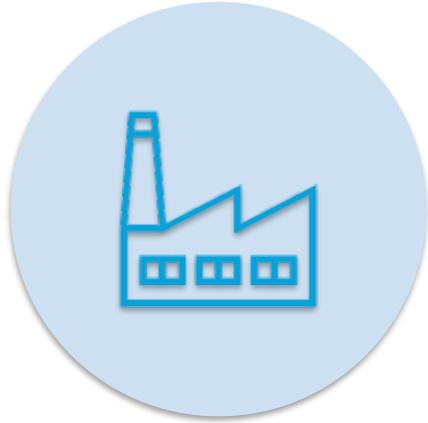
Total VOC →

Total VOC (57.94 tons) ≥ Total HAP VOC (4.50 tons) ✓
 Total PM10 (1.02 tons) ≥ Total PM HAP (0.00017 tons) ✓

Important Note: While HAP and CAP emissions are kept separate, overlapping HAP emissions are not. Do not report multiple of the same kind of HAP (e.g. Chromium and Chromium VI)



2024 EI WALKTHROUGH



**UPDATE FACILITY &
CONTACT
INFORMATION**



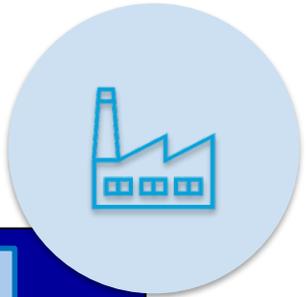
**DETERMINE
PARTICIPATION
STATUS (OPT
OUT/OPT IN)**



**SUBMIT 2024 EI &
CERTIFY**



STEP 1: ACCESS YOUR FACILITY IN GECO



**Georgia Environmental
Connections Online**

<https://geco.gaepd.org/>
(Register for an account if new to GECO)

GECO Home

Georgia Environmental Connections Online ("GECO") is an online system for Georgia Air Protection Branch applications.

Returning users with EI access – Facilities will be listed and the EI box checked. Click on “Facility Name” to access the EI form.

You have access to work on the following facilities:

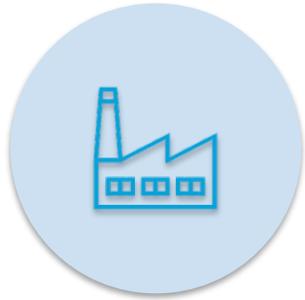
Facility Name	AIRS Number	User Admin	Permit Fees	Emissions Inventory
Durango-Georgia Paper Company	039-00001	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ford Motor Co	121-00364	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

[Request access to a facility](#)

New Users – Request access to your facility using the hyper link on the home page.



GECO FACILITY ACCESS REQUEST



GECO Facility Access Request

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

By AIRS Number

03900001

By Facility Name

Durango-Georgia Paper Company

GECO Access Type Requested *(Select all that apply.)*

- Facility Access
- Permit Fees
- Emissions Inventory

Request EI access

This facility has the following admin users. Please contact them directly to request access or use the form below to send an automated message.

- Jing Wang
- Emily Phillips
- Maria Geonczy

Check box if admin users are unavailable or EPD assistance is needed

If these admin users are unavailable or you need assistance from the Air Protection Branch instead, check this box.

Additional Comments *(Optional; these comments will be attached to the message.)*

Send Request

The following message will be sent to the **Facility Administrators** listed above.



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

Main Emission Inventory Contact can be changed here or from within the EI form.

Facility Home

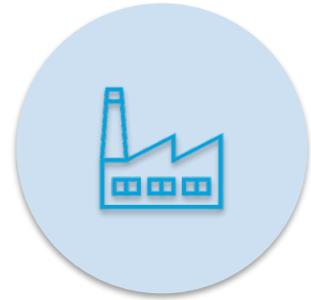
Managing user access for facility admins.

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. <i>Due: September 1, 2020</i>
Fees Summary	
Emissions Inventory	Enrolled in 2022 EI. <i>Due: June 30, 2023</i>
Test Notifications	No pending test notifications.

Access 2024 EI Application here



STEP 2: REVIEW FACILITY INFORMATION



Emissions Inventory

EI Home Historical Data

For more information on how to submit your Emissions Inventory, visit <https://epd.georgia.gov/forms-permits/air-protection-branch-forms-permits/point-source-emissions-inventory>.

1. Facility Information

Review the facility information below and if there is any mistake, please email: emissions.inventory@dnr.ga.gov.

Description	Kraft Pulp Mill
Operating Status	Operating as reported in 2020 * Operating status pertains only to the last Emissions Inventory reported
NAICS Code	111110 - Soybean Farming
Site Address	4244 International Parkway Suite 120-test ATLANTA, GA 30354
Geocoordinates	30.805990, -81.524999

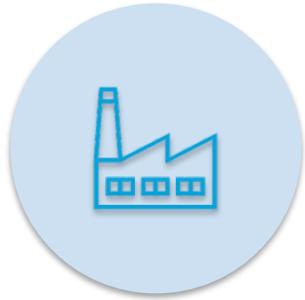
Please contact us for any facility information discrepancy.



[Open map in new window](#)



STEP 3: UPDATE EI CONTACT INFORMATION



2. CAERS Users

Please ensure all contact information is correct in communication preferences before proceeding to update CAERS contact information.

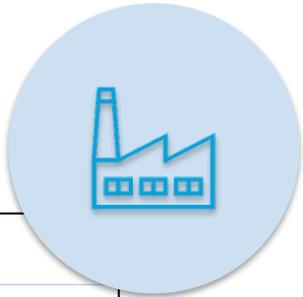
Next add and update CAERS users below. Use of CAERS requires one certifier and one or more preparers. If a single person serves both roles, they must be added as both.

Current CAERS Users

Role	User	Address	Email	Phone	Controls
Certifier	Ms. Maria Cooney	4244 International Blvd	emissions_inventory@dcr.ga.gov	1224567891	Edit Delete



STEP 3: UPDATE GEICO EI CONTACT INFORMATION



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

Home Facility Info User Access **Communication Preferences**

Communication Preferences

Current communication preferences and contacts for this facility. You can edit each type of communication by selecting the "Edit" button for each type.

Note: This page is for editing facility contact information. To edit your CAERS Users, go to the [Emissions Inventory](#) page.

Permit Fees [Edit](#)

Communication Preferences
Both electronic and mail

Primary Contact

Jing Wang
Engineer
Air Protection Branch
4244 International Parkway
Atlanta, GA 30354

404-363-7137
JING.WANG@DNR.ST

Additional Email

Home Facility Info User Access **Communication Preferences**

Communication Preferences / 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](#) [Permit Applications](#) **Emissions Inventory** [Testing and Monitoring](#)

Edit Preferences for Emissions Inventory

Primary Contact

Salutation ("Ms.", "Dr.", etc.)

First Name

Last Name *required*

Title

Organization

Street Address *required*

Apt / Suite / Other

City *required*

State *required*

Postal Code *required*

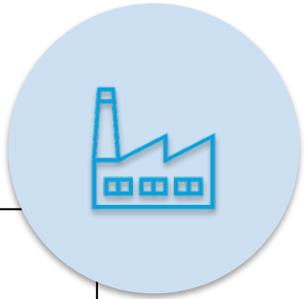
Telephone Number *required*

Primary Contact Email *required*

[Save Contact Info](#)



STEP 4: UPDATE CAERS USERS



2. CAERS Users

Please ensure all contact information is correct in communication preferences before proceeding to update CAERS contact information.

Next add and update CAERS users below. Use of CAERS requires one certifier and one or more preparers. If a single person serves both roles, they must be added as both.

If a single person serves both roles, they must be added as preparer and certifier.

Current CAERS Users

Role	User	Address	Email	Phone	Controls
Certifier	Ms Maria Geonczy	4244 International Pkwy Suite 120 Atlanta, GA 30310	emissions.inventory@dnr.ga.gov	1234567891	Edit Delete
Preparer	Ms Maria Geonczy	4244 International Pkwy Suite 120 Atlanta, GA 30310	emissions.inventory@dnr.ga.gov	9876543210	Edit Delete

[Add New CAERS User](#)

Verify or add your preparer(s) and certifier information. Note that you can change users at any time.



STEP 5: SUBMIT 2024 EI/ OPT-OUT DETERMINATION



Title V facilities will receive one of two emails indicating their status on January 6, 2025.

3. Submit EI

All facilities that need to opt out or submit 2024 Emissions Inventory data will receive one of two emails during the first week of January 2025. The email will indicate whether the facility likely qualifies to opt out, or is required to opt in to report their 2024 EI.

For Opt-out facilities:

- If the facility agrees with the opt-out determination listed in the rollout email, you can convert the email to PDF and upload to CAERS as the PTE analysis attachment.
- If corrections need to be made for an opt-out or opt-in facility, please download the [Opt-out form](#) to make any changes. Upload the completed form to CAERS as the PTE analysis attachment.

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

1. Register in CDX using the link to EPA CDX below and set up CAERS in CDX.
2. Await email approval from CDX that their CAERS account is linked to the correct facilities.
3. Once approved, select facility in CAERS, then click on the "Create New Report" button for the Report.

If a correction needs to be made, they can complete this opt-out form to upload to CAERS.

[Link to EPA CDX](#)

CAERS will reopen on January 6th

Click here to be directed to CDX to access 2024 EI prompts in CAERS.



OPT-OUT FORM – MODIFYING OPT-OUT PTE



2024 Georgia Point Source Emission Inventory (EI) Opt-Out Form

Form instructions:

Light yellow cells indicate a drop-down list.

All cells are required fields unless specified otherwise. Fields with an asterisk (*) are only required during a triennial year.

Upon completion, please upload this form into the Combined Air Emissions Reporting System (CAERS) as your opt-out justification.

If additional information needs to be provided, here are three acceptable methods:

- (1) Enter notes under the "Opt-out Justification" table.
- (2) Add notes on an added tab within this spreadsheet and indicate in the "Facility Response" where the additional notes are located.
- (3) Upload any additional document to supplement what you enter below and indicate in the "Facility Response" where the additional notes are located.

Light yellow cells are drop-down lists.

Provide the following as indicated:

- Permit condition
- TV permit application

Any additional information can be provided below table, on another tab, or another spreadsheet

Facility Information

Triennial/Annual EI Year? (Select)

AIR Facility Name (Select)

Annual PTE Thresholds

Permit condition limit.

PTE from Title V application

Pollutant not emitted.

(Select)

Opt-Out Justification

- Please enter Potential to Emit (PTE) emissions below.
- Next, select PTE emissions justification.
- Once selected, the next cell will autopopulate and you can use accordingly in the "Facility Response" column.

Pollutant	Annual EI PTE Emissions Threshold* (tpy)	PTE Emissions (tpy)	Select PTE emissions justification
VOC	250		(Select)
SO2	2500		(Select)
NOx	2500		(Select)
CO	2500		(Select)
Pb*	n/a		Annual EI Year: Lead (Pb) actual emissions not part of threshold determination.
PM10	250		(Select)
PM2.5	250		(Select)
NH3	250		(Select)

Facility Response

Example facility response:

Provide TV Permit # and limit condition. ex: 2631-039-0001-V-05-1 permit condition 3.2.4

(or) Provide Title V application # where the PTE value was reported. ex: TV-45678

- PTE emissions from permit must correspond to the EI calendar year
- If a permit was issued at some point of the EI calendar year, the greater of the PTE is used



CAERS – OPT-OUT QUESTION 1



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.
- 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**.
- 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 EI. If you have received an EI email notification, please contact emissions.inventory@dnr.ga.gov to be removed from the 2022 EI email list. You should also delete the facility from your "My Facilities" page.

Opt-out scenarios

- Operating but under thresholds
- Temporarily/ Permanently Shutdown all of 2024

Answering “No” to the first question will be directed to certify your report with no opt-out form needed.

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



CAERS – OPT-OUT QUESTION 2



Facility Emissions Thresholds

Pollutant	Annual Threshold (in Tons per Year)
Sulfur Dioxide (SO ₂)	Potential to emit ≥ 2500
Volatile Organic Compounds (VOC)	Potential to emit ≥ 250
Nitrogen Oxides (NO _X)	Potential to emit ≥ 2500
Carbon Monoxide (CO)	Potential to emit ≥ 2500
Primary PM _{2.5} . As applicable, also report filterable and condensable components.	Potential to emit ≥ 250
Primary PM ₁₀ . As applicable, also report filterable and condensable components.	Potential to emit ≥ 250
Ammonia (NH ₃)	Potential to emit ≥ 250

Is the facility below ALL of the thresholds listed?

- Yes
- No

Cancel

Proceed

During an annual year, lead (Pb) is not a reporting threshold but still needs to be reported.

Answering “Yes” to the second question:

- Statement appears that summarizes your selection and next steps.
- This will send you to a screen that requires an attached opt-out form found in GECSO.



CAERS – OPT-OUT FORM ATTACHMENT



My Facilities > Emissions Reports > 2022 Emissions Report ⚠ CBI Disclaimer CAERS H

Agency ID: 999999999
 GADNR FAKE: CAER Test Facility
 538 Cajundome Blvd
 Lafayette, GA 70506
 2022 Emissions Report
 Agency: GADNR

Report Facility & Emissions Information Perform Quality Checks Submit to SLT Authority Approved by SLT Authority

Report Summary							
Pollutant	Type	Fugitive Amount	Stack Amount	Units of Measure	2022 Reported Emissions	Previous Year Reported Emissions	Previous Submittal Year
Total Emissions (Tons)	--	--	--	--	0	0	--

Download Report Summary Download Process Emissions Summary

Preparer/NEI Certifier Attachments

User Name	Comments	Attachments
		<input type="button" value="Attach Report Document"/>

You must attach your Potential to Emit (PTE) analysis before you can certify and submit.

Attach email confirmation or updated opt-out form and any other proof of PTE documentation (pdf and excel files accepted now).

Attach PTE analysis before you can certify your opt-out status.

You must attach your Potential to Emit (PTE) analysis before you can certify and submit.



CAERS – OPT IN



Facility Emissions Thresholds

Pollutant	Annual Threshold (in Tons per Year)
Sulfur Dioxide (SO ₂)	Potential to emit ≥ 2500
Volatile Organic Compounds (VOC)	Potential to emit ≥ 250
Nitrogen Oxides (NO _x)	Potential to emit ≥ 2500
Carbon Monoxide (CO)	Potential to emit ≥ 2500
Primary PM _{2.5} . As applicable, also report filterable and condensable components.	Potential to emit ≥ 250
Primary PM ₁₀ . As applicable, also report filterable and condensable components.	Potential to emit ≥ 250
Ammonia (NH ₃)	Potential to emit ≥ 250

Is the facility below ALL of the thresholds listed?

- Yes
- No

Submit to begin 2024 EI.



GEORGIA QA



GEORGIA QA – FACILITY OVERVIEW

- **Opt-Out Status**
 - Review PTE if operating and PTEs are below AERR annual thresholds
 - Verify shut-down status (no opt-out form required)
- **Co-located facilities**
 - Report EI if collectively PTE thresholds are exceeded
- **Control units**
 - Applicable permit and previous CAERS entry
 - Assure that all controlled pollutants are listed with both the control device and control path.



GEORGIA QA – EMISSIONS DATA

- **SCC Code Specificity:** Replace general SCC with a more specific code to better represent emission process
- **Zero throughput and emissions** for operating process should be marked as temporarily or permanently shut down.
- Check reasons for **significant facility-wide emissions change** in CAP and HAP totals
 - CAPs - >20%
 - HAPs - >10%
- **Significant Figures** – CAERS has no decimal limits, 6 decimal points is preferred; do not round to whole numbers when manually entering emissions



GEORGIA QA – EMISSIONS DATA

Process level emissions calculation checks for correctness and reproducibility

Formula:
$$=[@[throughput Value]]*[@[emissions Factor]]/2000$$

pollutant Name	total Emissions	Emissions Check	apportioned Emission	emissions Uom	release Point	release overall	emissions Calc	emissions Numerator	emissions Denominator
PM Condensable	10.164	10.164008	10.164	TON	100 R5A		Stack Test (no Control Efficiency used)	0.028409 LB	TON
Nitrogen Oxides	533.23	533.255303	533.23	TON	100 R5A		Continuous Emission Monitoring System	132.3051 LB	HR
Lead	0.00429336	0.004293	0.00429336	TON	100 R5A		Trade Group Emission Factor (no Control Efficiency used)	0.000012 LB	TON
Carbon Monoxide	236.583	236.583469	236.583	TON	100 R5A		Stack Test (no Control Efficiency used)	0.661254 LB	TON
Volatile Organic Compounds	0.0395811	0.0395811	0.0395811	TON	CP - RF1	Control Path for RF1	Other Emission Factor (no Control Efficiency used)	0.28 LB	E3GAL

emission UnitDescription	process Id	processDescription	scc Code	throughput Material	throughput Value	throughput Uom	fuel Material	fuel Value	fuel Uom	heat Content Ratio	heat Content Numerator	pollutant Name
Recovery Furnace #1	BLS	Recovery Furnace #1: BLS Combustion	30700110	Black Liquor Solids	715560	TON	Black Liquor Solids	715560	TON	5400 BTU		PM Condensable
Recovery Furnace #1	BLS	Recovery Furnace #1: BLS Combustion	30700110	Black Liquor Solids	715560	TON	Black Liquor Solids	715560	TON	5400 BTU		Nitrogen Oxides
Recovery Furnace #1	BLS	Recovery Furnace #1: BLS Combustion	30700110	Black Liquor Solids	715560	TON	Black Liquor Solids	715560	TON	5400 BTU		Lead
Recovery Furnace #1	BLS	Recovery Furnace #1: BLS Combustion	30700110	Black Liquor Solids	715560	TON	Black Liquor Solids	715560	TON	5400 BTU		Carbon Monoxide
Recovery Furnace #1	FO	Recovery Furnace #1: FO #6	10100401	Residual Oil (No. 6)	283	E3GAL	Residual Oil (No. 6)	283	E3GAL	150 E6BTU		Volatile Organic Compounds
Recovery Furnace #1	FO	Recovery Furnace #1: FO #6	10100401	Residual Oil (No. 6)	283	E3GAL	Residual Oil (No. 6)	283	E3GAL	150 E6BTU		Sulfur Dioxide

If the material is a fuel:

- Enter fuel material first in CAERS then copy over to throughput material
- Include heat content value
 - CAERS will conduct the conversion if the emission factor has a heat UOM

Copy Fuel Data to Throughput Data Fields



GEORGIA QA – EMISSIONS DATA

- **Emissions factors, throughput values, operating hours, etc should** be entered into CAERS
- **Attachments are reserved for material balance and engineering judgement** (explained in later slides)
 - Do not use an attachment to avoid entering emission factors (and other values) into CAERS
- **All pollutants must be recorded no matter how insignificant**
 - Common missing pollutants include Ammonia and Lead
 - Check permit for expected pollutants
 - Check WebFIRE for expected pollutants
 - Enter 0 if the specific process does not actually emit, provide an explanation



GEORGIA QA – PM REPORTING

- **2 of the 3 components of PM10 and PM2.5 emissions must be reported**
- PM components
 - PM Condensable (PM-CON)
 - PM10/2.5 Filterable (PM10-FIL and PM2.5-FIL)
 - PM10/2.5 Primary (PM10-PRI and PM2.5-PRI)
- PM-CON does not occur in all processes so in some cases PM10/2.5-FIL may equal PM10/2.5-PRI.
- Acceptable PM assumptions due to lack of supporting data or emissions factor
 - PM10-PRI = PM2.5-PRI
 - PM10-FIL = PM2.5-FIL
 - If "Stack Test" is used, the emissions factor (EF) must be verified through the referenced test, or the calculation method must be revised.
 - **If no reliable EF, allow EPA use PM augmentation tool to estimate PM emissions.**



GEORGIA QA – SOURCE CLASSIFICATION CODE (SCC)

- **Each process in a unit should have a unique SCC**
 - Unless using the alternative throughput option for a process
- Multiple processes of the same unit using the same SCC will result in a warning in CAERS
- Different fuels should have different in-process fuel SCCs (see below for examples)

Unit ID: B79
 Unit Description: Imp Mill Flash Dryer
 Unit Design Capacity:
 Comments:
 Reviewer Comment:

Unit Type Code: Dry Rotary Dryer
 Operating Status: Operating
 Year Op Status Changed: 2008
 Unit Design Capacity UoM:

Combustion process should use in-process fuel SCC

Processes Associated with this Emissions Unit

Process ID	SCC
Combustion	30502099
Process	30502099

SCC	Process	Fuel	Category	Industry
39000602	Industrial Processes	In-process Fuel Use	Natural Gas	Cement Kiln/Dryer
39000603	Industrial Processes	In-process Fuel Use	Natural Gas	Lime Kiln
39000605	Industrial Processes	In-process Fuel Use	Natural Gas	Metal Melting
39000699	Industrial Processes	In-process Fuel Use	Natural Gas	General
39000701	Industrial Processes	In-process Fuel Use	Process Gas	Coke Oven or Blas
39000702	Industrial Processes	In-process Fuel Use	Process Gas	Coke Oven Gas
39000797	Industrial Processes	In-process Fuel Use	Process Gas	General
39000801	Industrial Processes	In-process Fuel Use	Coke	Mineral Wool Fuel
39000889	Industrial Processes	In-process Fuel Use	Coke	General
39000899	Industrial Processes	In-process Fuel Use	Coke	General: Coke

Bulk Download Options
 Download the complete SCC list.

[Download List](#) 3.69Mb CSV File

<https://sor-scc-api.epa.gov/sccwebservices/sccsearch/>



GEORGIA QA – OPERATING HOURS

- If using the bulk upload template, average days/week, hours/day, and weeks/reporting period must equal hours/reporting period.
 - CAERS will change the reported hours/reporting period to equal the product of the three operating values
 - The change can be seen in the “Report Creation Log”
- Average days/week and average hours/day – up to 3 decimal places
- Average weeks/reporting period & Hours/reporting period - integer

Operating Details				Edit
Avg. Days per Week:	5.675	=	Hours per Reporting Period:	692
Avg. Hours per Day:	2.345		Winter Operating Percent:	25
Avg. Weeks per Reporting Period:	52		Spring Operating Percent:	25
			Summer Operating Percent:	25
			Fall Operating Percent:	25



GEORGIA QA – CALCULATION METHOD DOCUMENTATION (1)

Calculation Method: Stack Test

No control vs control plus control efficiency

Calculation Method: Stack Test (pre-control) plus Control Efficiency

Emission Factor: 0.01125

Emission Factor Description: Provide test date, emission factor ratio if applicable, reference of EF ratio, control used during test

- Provide:
- Test date
 - EF ratio, if applicable (include reference)
 - Control info, if applicable

Note 100 character maximum.

Comments: Control used during test mentioned above, any other information that can be helpful in reproducing the total emissions

Additional room for comments

Calculate Emissions Cancel Save



GEORGIA QA – CALCULATION METHOD DOCUMENTATION (2)

Calculation Method: Material Balance

Emission Information

Pollutant: Volatile Organic Compounds - VOC

Pollutant Code: VOC

Pollutant Name: Volatile Organic Compounds

CAS ID:

Calculation Method: Material Balance

Material balance data to provide with calculations

PM emissions	VOC emissions
<ul style="list-style-type: none">density or specific gravitysolids content (in weight percent or pounds per gallon), andamount of material used.	<ul style="list-style-type: none">density or specific gravity,VOC content or solids content (in weight percent or pounds per gallon), andthe amount of the material used.

Description of Calculation: Attach material balance calculations in report summary page

Comments:

I prefer to calculate the total emissions of this pollutant.

Cancel Save

Attach material balance calculations in report summary page



GEORGIA QA – CALCULATION METHOD DOCUMENTATION (3)

Emission Information

Calculation Method: Other Emissions Factor

Pollutant Name: Carbon Monoxide CAS ID: 630-08-0

Calculation Method: * Other Emission Factor (no Control Efficiency used)

Emission Factor: * 84 Emission Factor Notes:

Emission Factor Description: * AP-42. Natural Gas Combustion Table 1.4-1, March, 1998

Emission Factor Condition: Emission Factor Source:

Emission Factor Numerator UoM: * Emission Factor Denominator UoM: * E6FT3SD

Include reference for emissions factor.

Overall Control %:

Total Emissions: * 0.30387 Emissions UoM: * TON

I prefer to calculate the total emissions of this pollutant.

Comments:

Best practice not to check and have CAERS automatically calculate.



GEORGIA QA – CALCULATION METHOD DOCUMENTATION (4)

Calculation Method: Engineering Judgement

Emission Information

ⓘ Pollutant Name:

PM2.5 Primary (Filt + Cond)

ⓘ CAS ID:

PM25-PRI

ⓘ Calculation Method:*

Engineering Judgment

ⓘ Emission Factor:

ⓘ Emission Factor Notes:

ⓘ Emission Factor Description:

Calculation adding PM CON + PM2.5 FIL

ⓘ Emission Factor Condition:

ⓘ Emission Factor Source:

ⓘ Emission Factor:

Emissions factor entry not necessary for this method.

Denominator UoM:

ⓘ Overall Condition:

Provide general methodology in comment and attach engineering judgment calculations in report summary page.

ⓘ Total Emissions:

Emissions UoM:*

TON

I prefer to calculate the total emissions of this pollutant.

Comments:

Calculation adding PM CON + PM2.5 FIL



GEORGIA QA – COMMON WARNINGS

- Reviewer will re-run the Quality Checks and review warnings**

Warnings	Suggestions to avoid Warnings
Emissions same as previous EI submission.	Verify emissions are correct and update if necessary.
SCC changed for this process.	Confirm the SCC change is appropriate with GA EPD.
Multiple processes using SCC 39999999 appear different.	Review processes for SCC 39999999 to ensure to choose specific SCC matching the process
Multiple processes using the same SCC appear different.	Review processes for SCC to ensure differences are intentional and emissions are accurate.
Incorrect SCC for fuel throughput.	Confirm you are using the correct SCC for reporting fuel throughput.
Throughput 20% higher than previous report.	Re-check throughput calculations to ensure accuracy.
Missing geographic coordinate (SW Latitude/Longitude).	Provide both SW Corner Latitude and Longitude coordinates.
Control not assigned to Control Paths.	Assign the control to an appropriate Control Path.
Control Path not assigned to Release Point Apportionments.	Assign the Control Path to the relevant Release Point Apportionment.
Empty Control Path.	Add controls, children paths, and pollutants to the Control Path, or remove if unnecessary.



HELPFUL TIPS FOR 2024 EI SUBMITTAL



HELPFUL TIPS – REPORT CREATION LOG

- Appears when first opening your report for the new EI year
- Provides insight on two types of changes that could have occurred:
 - EPA updates
 - Bulk upload template to CAERS user interface

Report Has Been Successfully Created

Your report has been successfully created. As part of the report creation process CAERS will check for updated US EPA emission factors and attempt to automatically update those for you. CAERS also reconciles Emissions Unit, Processes, Controls and Control Paths by ensuring all operating components in the previous report are present in the current report.

Please view Report Creation Log to see any changes made to your report.

[View Log](#) [Close](#)

Report Facility & Emissions Information Perform Quality Checks Submit to SLT Authority

Report Creation Log

1. [Facility Site](#) - Information for this facility was updated.
2. [Facility Site](#) - NAICS code 212323 was added.
3. [Emissions Unit: F4, Emission Process: 1](#) - The Hours per Reporting Period has been updated.
4. [Emissions Unit: F4, Emission Process: 1, Pollutant: Sulfur Dioxide](#) - The USEPA Emission Factor has been updated.
5. [Emissions Unit: F4, Emission Process: 1, Pollutant: PM10 Primary \(Filt + Cond\)](#) - The USEPA Emission Factor has been updated.
6. [Emissions Unit: F4, Emission Process: 1, Pollutant: Nitrogen Oxides](#) - The USEPA Emission Factor has been updated.
7. [Emissions Unit: F4, Emission Process: 1, Pollutant: PM2.5 Primary \(Filt + Cond\)](#) - The USEPA Emission Factor has been updated.
8. [Emissions Unit: F4, Emission Process: 1, Pollutant: Carbon Monoxide](#) - The USEPA Emission Factor has been updated.
9. [Emissions Unit: F4, Emission Process: 1, Pollutant: Volatile Organic Compounds](#) - The USEPA Emission Factor has been updated.
10. [Emissions Unit: M4, Emission Process: 1](#) - The Hours per Reporting Period has been updated.
11. [Emissions Unit: F5, Emission Process: 1](#) - The Hours per Reporting Period has been updated.
12. [Emissions Unit: F5, Emission Process: 1, Pollutant: Sulfur Dioxide](#) - The USEPA Emission Factor has been updated.
13. [Emissions Unit: F5, Emission Process: 1, Pollutant: PM10 Primary \(Filt + Cond\)](#) - The USEPA Emission Factor has been updated.
14. [Emissions Unit: F5, Emission Process: 1, Pollutant: Nitrogen Oxides](#) - The USEPA Emission Factor has been updated.
15. [Emissions Unit: F5, Emission Process: 1, Pollutant: Volatile Organic Compounds](#) - The USEPA Emission Factor has been updated.



HELPFUL TIPS – ENTERING NEW EMISSION UNITS

- Match emission unit and control device IDs as identified in permit.
 - Do not modify IDs that are already entered in CAERS.
- Order of emission data entry:
 - Emission unit > Process > Pollutants > Release Point > Control Device > Path
 - Then connect via Release Point Apportionment found in process level of an emission unit

Release Points Associated with this Process

Release Point	Release Type	Control Path	%		
Total % Apportionment of Emissions			0%		

Note: Each process must allocate exactly 100% of its emissions to one or more release points before the report can be submitted.

Natural Gas Throughput Value: 5000

Release Point Apportionment

Select a Release Point
RP-ESP -

Select a Control Path (optional)
Boiler-ESP

% Release Point Apportionment* 100

Save Cancel

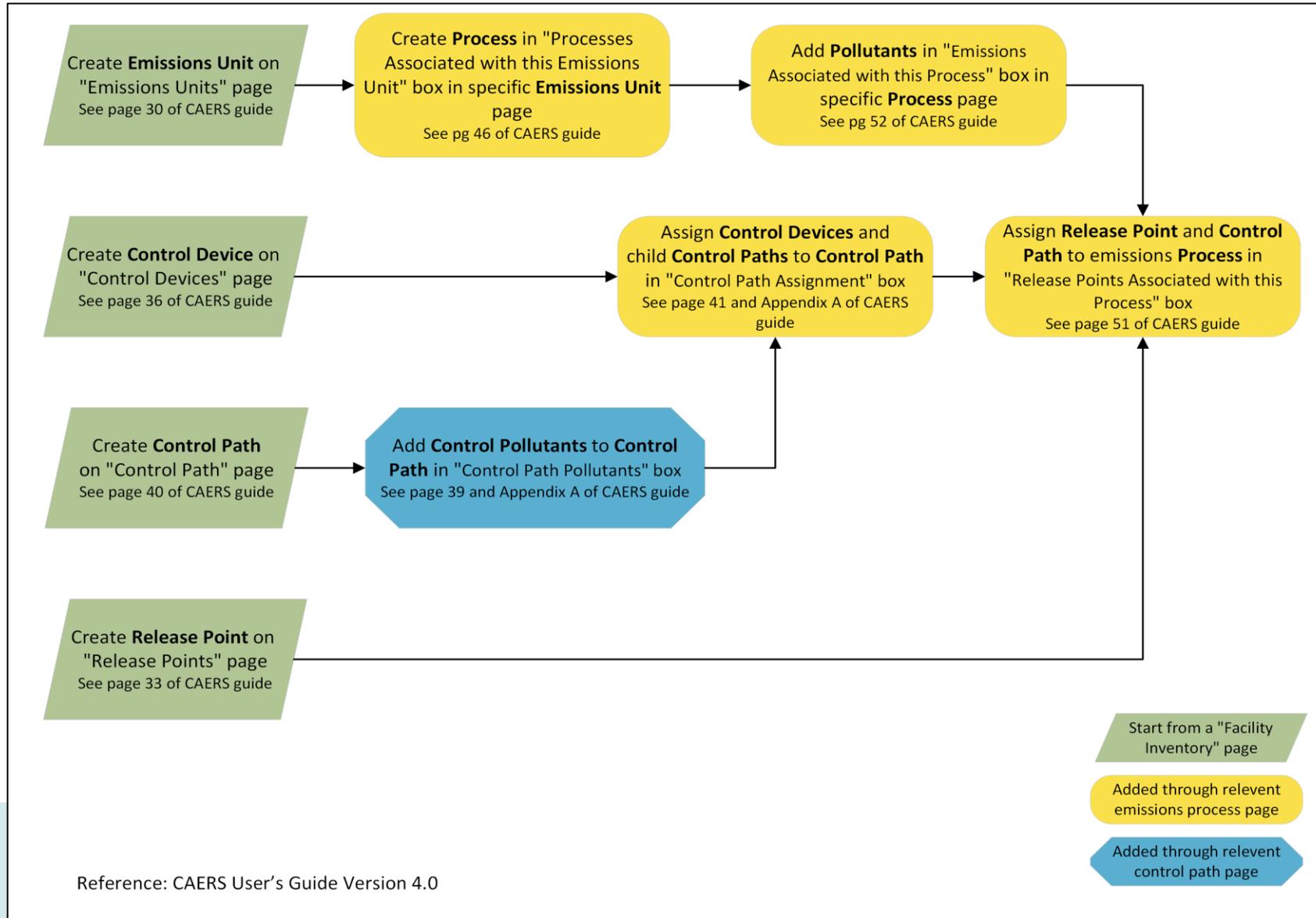
Release Points Associated with this Process

Release Point	Release Type	Control Path	%		
RP-ESP	Vertical	Boiler-ESP	100%		
Total % Apportionment of Emissions			100%		

Note: Each process must allocate exactly 100% of its emissions to one or more release points before the report can be submitted.



HELPFUL TIPS – ENTERING NEW EMISSION UNITS





HELPFUL TIPS - CORRECT CONTROLS ERROR & WARNING

Controls are added to a device through the process page.

- ▼ Emissions Inventory
 - ▼ Units 1-25
 - ▶ 0008
 - ▼ 0401
 - RBH1 <**
 - ▶ 1007
 - ▶ 120-5
 - ▶ CB04
 - ▶ CB05
 - ▶ CB06
 - ▶ CB08
 - ▶ CB09
 - ▶ CB10
 - ▶ CB11
 - ▶ EU0160

1. Processes can be found through the “Emissions Inventory” menu on the left-hand side of the page.

Release Points Associated with this Process

Release Point	Release Type	Control Path	%		
RBH1	Vertical	TestPath	100%		
Total % Apportionment of Emissions			100%		

+

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

Release Point Apportionment

Select a Release Point

RBH1 - RBH1 - #1 Raymond Mill Baghouse

Select a Control Path (optional)

TestPath

% Release Point Apportionment* 100

Save Cancel

3. Add control path in the “Release Point Apportionment” menu.



HELPFUL TIPS – DATA BULK ENTRY

- If no units/processes have changed, Data Bulk Entry is a great tool to update throughput.
- Throughput & fuel material visible in the Data Bulk Entry feature.
- Ensure both are the same values if entering a fuel material

Data Bulk Entry								
Process Information		Emission Information						
Unit ID	Process ID	Throughput Material	Throughput Value		Fuel Material	Fuel Value	Previously Reported Throughput Value	% Change in Throughput
14	1	Distillate Oil (Diesel)	1.5	GAL	Distillate Oil (Diesel)	1.5 GAL	1 GAL	50.000



FEEDBACK REPORT – ERRORS

Critical Errors need corrected	Correction Resolutions
Unit Type Code is a required field.	Review valid Unit Type Codes in CAERS and update to a valid code.
Path Control pollutant codes must be unique.	Re-check for duplicate Pollutant Codes.
Process status year must be valid for non-operating statuses.	Review emissions for the latest valid non-operating year.
Unit status year must be valid for non-operating statuses.	Review emissions for the latest valid non-operating year.
ControlPathDefinition needs at least one pollutant and device.	Add at least one pollutant and one control device.
Stack Release Point Dimensions Required.	Provide EITHER a) Release Point Stack Diameter OR b) Release Point Length AND Width if non-circular stack, in FT, from 0.1 to 100
User role cannot modify Release Point Type to Fugitive.	If Release Point Type changed, please contact EPD for updating type from Stack to Fugitive.
Design Capacity Unit of Measure Code must match valid codes.	Review valid Design Capacity Unit Codes on the EIS Gateway and resubmit with a valid code.



RESOURCES AND NEXT STEPS



RESOURCES

- **GECO EI Application Training PowerPoint and Recording**

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

- **CAERS User guide**

<https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers>

- **Past EPA CAERS Webinar Recordings**

<https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers>



WHAT'S NEXT?

- **EPA Training (December 2024, January 2025)**
 - Welcome to CAERS for New Reporters: 12/16/24, 2:30 – 4 pm ET
 - CAERS EI User Interface: 1/16/25 3:30-5 pm ET
 - CAERS EI Bulk Uploading Template 1/21/25 1 -2:30 pm ET
 - CAERS EI Control Paths: 1/30/25 3-4:30 pm ET
- Please visit <https://www.epa.gov/combined-air-emissions-reporting/combined-air-emissions-reporting-system-caers> to view the training recordings.
- **Virtual Help Sessions (Every Tuesday/Thursday from Feb– July)**
- **There will be no extensions or Help Sessions after July 15th**
- **QA the EI data as soon as it is submitted**
- **Reach out to the QA'd facilities if any errors or data verifications**



THANK YOU!

Your participation helps us obtain and maintain an accurate emissions inventory for the state of Georgia which is vital to reach our goal of improving our State's air quality.

Thank you for your hard work and cooperation!





QUESTIONS

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

