



# WELCOME TO HAPS REPORTING FOR THE 2020 NEI TRAINING!

**The webinar will begin in a few minutes...**

- **Please keep your video and audio off for the duration of the presentation.**
- **If using a phone, please use the “local” number**
- **If you have any questions, please send them to the host via 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 presentation will be recorded and posted online. More info covered on Resources slide.**



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

# HAPs Reporting in CAERS for the 2020 NEI

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**2020 EI Point Source Emission  
HAPs Reporting Training Webinar**  
**April 20, 2021**



# OUTLINE

- What is CAERS?
- Emission Inventory Regulatory Basis
- Reporting HAPs in CAERS
- CAERS EI HAPs Reporting Walkthrough
- Upcoming Events (Training Opportunities, Resources)



# 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:

- SLTs 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 report Hazardous Air Pollutants (HAPs) emissions at the process level which is sent to the TRI-MEweb to pre-populate air emissions.
  - Starting this year, GA EPD is encouraging facilities to voluntarily submit HAP emissions to CAERS. In the future, this may be required.
  - TRI data must still be completed and certified in TRI-MEweb



# EI REGULATORY BASIS

- **Regulations requiring GA EPD to collect an Emissions Inventory**
  - **Federal:** 40 CFR Part 51 - Air Emissions Reporting Requirements (AERR)
  - **State:** Georgia Rule 391-3-1-.02(6)(b)(1)
- **HAPs emission reporting is not required under the federal AERR rule or state regulations**
- **CAERS allows GA facilities to voluntarily submit HAPs emissions at the process level**

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



# 2020 NEI APPLICABILITY

**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

## **2020 is a Triennial Year**

- Triennial thresholds are lower than Annual Year thresholds
- Thresholds are PTE-based, except Pb (actual)

Triennial Year PTE Thresholds	
Pollutant	(tons per year)
SO <sub>2</sub>	≥ 100
VOC	≥ 100
NO <sub>x</sub>	≥ 100
CO	≥ 1000
Pb	≥ 0.5 (actual)
Primary PM <sub>10</sub>	≥ 100
Primary PM <sub>2.5</sub>	≥ 100
NH <sub>3</sub>	≥ 100



# EI HAPS REPORTING WALKTHROUGH



# 2020 EI COLLECTION FLOW

- 1. Opt-in/Opt-out of 2020 EI via the Georgia Environmental Connections Online (GECO) Program**
  - Applicability is based on potential emissions; reporting is based on actual emissions.
- 2. Beginning March 8, opt-in facilities can work in CDX CAERS for the 2020 NEI**
  - New Users must register in CDX
  - Existing users can update any information if needed
  - Add CAERS under CDX
  - Request access to your facilities
  - Reviewers (GA EPD) grants access
  - Work on CAPs and HAPs emissions submittal
  - Reviewers (GA EPD) QA 2020 EI data

**2020 EI should be submitted to GA EPD through CAERS by June 30, 2021**





# REPORTING HAPS IN CAERS

- **Report HAPs emissions with CAPs emissions at the process level**
  - Note: Not all HAPs available in TRI-MEWEB are available in NEI.
- **Data in the CAERS database must be certified to be used in TRI-ME<sub>WEB</sub>**
- **When in TRI-ME<sub>WEB</sub>:**
  - A green icon will appear titled “NEI data available”
  - Click on the green icon to show NEI widget
  - If you select “Yes, copy my CY [year] NEI emission data into Section 5.1 and 5.2”, the HAPs emissions will be copied into the TRI form R.
  - If facility decides to not transfer the HAPs data shown in the pop-up, your comment will be collected.



# LINK TO CDX LOG IN

Register/Update CAERS contact information

https://cdx.epa.gov



Home About Recent Announcements Terms and Conditions FAQ Help

CDX Central Data Exchange

Contact Us

Log in to CDX

User ID

Password

Show Password

Log In

Register with CDX

[Forgot your Password?](#)

[Forgot your User ID?](#)

[Warning Notice and Privacy Policy](#)

- CAERS opened on **March 8**

## 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 – HAPS AND CAPS EMISSIONS

## Reporting Period

Edit

Reporting Period: Annual  
Throughput Material: Distillate Oil (No. 2)  
Fuel Material:

Operating Type: Routine  
Throughput Value: 180.57  
Fuel Value:  
Heat Content Ratio:

Throughput Parameter: Input  
Throughput UoM: 1000 GALLONS  
Fuel UoM:  
Heat Content Ratio Numerator:

Comments:

## Emissions Associated with this Process

Pollutant Name	Code	CAS ID	
Carbon Monoxide	CO	630-08-0	
Formaldehyde	50000	50-00-0	
Nitrogen Oxides	NOX		
PM10 Filterable	PM10-FIL		
PM2.5 Filterable	PM25-FIL		
Sulfur Dioxide	SO2	9-5-7446	
Volatile Organic Compounds	VOC		



## Release Points Associated with this Process

Release Point	Release Type	Control Path	%		
SB01	Vertical		100%		
Total % Apportionment of Emissions			100%		
+					
<i>Note: Each process must allocate exactly 100% of its emissions to one or more release points before the report can be submitted.</i>					

Add CAPs/HAPs



# CAERS – ENTER HAPS EMISSIONS

## Emission Information

<b>?</b> Pollutant:	Formaldehyde - 50000 - 50-00-0	<b>?</b> Pollutant Code:	50000
<b>?</b> Pollutant Name:	Formaldehyde	<b>?</b> CAS ID:	50-00-0
<b>?</b> Calculation Method:	Site-Specific Emission Factor (no Control Efficiency used) <span>▼</span>		
<b>?</b> Emission Factor:	.045 <span>▲▼</span>	<b>?</b> Emission Factor Description:	Site Emissions factor <span>⋮</span>
<b>?</b> Emission Factor Numerator UoM:	LB <span>▼</span>	<b>?</b> Emission Factor Denominator UoM:	E3GAL <span>▼</span>
<b>?</b> Overall Control %:	0 <span>▲▼</span>		
<b>?</b> Total Emissions:	.00405 <span>▲▼</span>	<b>?</b> Emissions UoM:	TON <span>▼</span>

I prefer to calculate the total emissions of this pollutant.

Description of Calculation:

$EF * \text{annual throughput} = \text{emissions}$



# CAERS – BULK UPLOAD TEMPLATE

Field	Reporting Period*	Pollutant Name*	I prefer to calculate this emission myself	Total Emissions*	Emissions Unit of Measure*	Overall Control %
example entry	ML05-1-Annual	Acetaldehyde	false	1000	TON	
	SCR-1-Annual	Benzene	false	1007.75	TON	
	SCR-2-Annual	Nitrogen Oxides	true	2015.6	TON	
	CT5A-1-Annual	Carbon Monoxide	false	0.0059	TON	
	CT5A-1-Annual	Nitrogen Oxides	true	1.545	TON	
	CT5A-1-Annual	PM10 Primary (Filt + Cond)	false	0.0215	TON	
	CT5A-1-Annual	PM2.5 Primary (Filt + Cond)	false	0.0215	TON	
	CT5A-1-Annual	Sulfur Dioxide	false	1.894	TON	
	CT5A-1-Annual	Volatile Organic Compounds	false	0.0007	TON	
	SB01-1-Annual	Carbon Monoxide	false	0.4514	TON	
	SB01-1-Annual	Formaldehyde	true	0.00405	TON	
	SB01-1-Annual	Nitrogen Oxides	false	2.167	TON	
	SB01-1-Annual	PM10 Filterable	false	0.0903	TON	
	SB01-1-Annual	PM2.5 Filterable	false	0.0217	TON	
	SB01-1-Annual	Sulfur Dioxide	false	0.0192	TON	
	SB01-1-Annual	Volatile Organic Compounds	false	0.0181	TON	
	SB02-1-Annual	Carbon Monoxide	false	0.3621	TON	
	SB02-1-Annual	Nitrogen Oxides	false	1.738	TON	

Enter HAPs emissions



# CAERS – FACILITY EXAMPLE

Report Facility & Emissions Information

Perform Quality Checks

Submit to SLT Authority

Approved by SLT Authority

Agency ID: [REDACTED]  
 [REDACTED]  
 C [REDACTED] 16  
 2020 Emissions Report  
 Agency: GADNR

[Report Summary](#) <

[Report History](#)

[Quality Checks](#)

[Data Bulk Entry](#)

▼ [Facility Inventory](#)

Facility Information

Emissions Units

Release Points

Control Devices

Control Paths

▼ [Emissions Inventory](#)

▶ CT5A

▶ SB01

▶ SB02

▶ SG01

▶ SG02

## Report Summary

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
PM10 Primary (Filt + Cond)	CAP	0.01075	118.52075	Tons	118.5315	118.5315	2019
PM2.5 Filterable	CAP	0	0.1179	Tons	0.1179	0.1179	2019
PM2.5 Primary (Filt + Cond)	CAP	0.01075	108.18675	Tons	108.1975	108.1975	2019
Sulfur Dioxide	CAP	0.947	2133.0816	Tons	2134.0286	2134.0286	2019
Volatile Organic Compounds	CAP	0.00035	37.28555	Tons	37.2859	37.2859	2019
<b>Total Emissions (Tons)</b>	--	--	--	--	<b>4398.32375</b>	<b>4398.3197</b>	--



# CAERS – SUMMARY PAGE

Agency ID: [REDACTED]  
[REDACTED]  
[REDACTED] 16  
2020 Emissions Report  
Agency: GADNR

Report Facility & Emissions Information

Perform Quality Checks

Submit to SLT Authority

Approved by SLT Authority

Report Summary <

Report History

Quality Checks

Data Bulk Entry

▼ Facility Inventory

Facility Information

Emissions Units

Release Points

Control Devices

Control Paths

▼ Emissions Inventory

▶ CT5A

▶ SB01

▶ SB02

▶ SG01

▶ SG02

## Report Summary

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
PM10 Primary (Filt + Cond)	CAP	0.01075	118.52075	Tons	118.5315	118.5315	2019
PM2.5 Filterable	CAP	0	0.1179	Tons	0.1179	0.1179	2019
PM2.5 Primary (Filt + Cond)	CAP	0.01075	108.18675	Tons	108.1975	108.1975	2019
Sulfur Dioxide	CAP	0.947	2133.0816	Tons	2134.0286	2134.0286	2019
Volatile Organic Compounds	CAP	0.00035	37.28555	Tons	37.2855	37.2855	2019
Total Emissions (Tons)	--	--	--	--	3,453.3397	3,453.3397	--

HAPs emission summary



# TRI-ME<sub>WEB</sub>: FORM R, SECTION 5 SCREEN

TRI-ME<sub>WEB</sub> JSHRESTHA - CERTIFIER - jshrestha@cgl.com (Log out)

My TRI | Facility Management | Forms | Submission History | Help Tutorials | Preferences | Help Chat

Part I | 3/4: Activities and Uses/Max On-site | **5: On-site Releases** | 6: Off-site Transfers | 7: On-site Waste Management | 8: Waste Management | 9: Misc. Information

## On-site Releases and Disposal

Form R, Part II, Section 5 [Need Reporting Help?](#)

RY 2019  
TEXPAR BAINBRIDGE TERMINAL - 31717TXPRN268IN  
1,2,4-Trimethylbenze...

Hover your cursor over the [?](#) icon for more information. Enter data using detailed worksheet.

Form Section	<input type="checkbox"/> Not Applicable <a href="#">?</a>	Total Quantity (lbs) <a href="#">?</a>	Numeric Basis <a href="#">?</a>	Basis of Estimate <a href="#">?</a>
<b>Air Releases</b>				
Section 5.1: Fugitive or Non-Point Air Emissions <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.2: Stack or Point Air Emissions <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
<b>Land Releases</b>				
Section 5.4.1: On-site Underground Injection: Class I Wells <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.4.2: On-site Underground Injection: Class II-V Wells <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.5.1A: On-site Landfills: RCRA Subtitle C <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.5.1B: On-site Landfills: Other <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.5.2: On-site Land Treatment and Application Farming <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.5.3A: On-site Surface Impoundments: RCRA Subtitle C <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.5.3B: On-site Surface Impoundments: Other <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>
Section 5.5.4: Other On-Site Disposal <a href="#">?</a>	<input type="checkbox"/>	<input type="text"/> or <a href="#">Select a Range Code</a> -		<a href="#">Select a Basis of Estim...</a>

A facility that manages waste rock piles may elect to indicate that at least some of the quantities entered above for Section 5.5 were managed in waste rock piles.

Select the checkbox if you would like to indicate that quantities reported in Section 5.5 were managed in waste rock piles.

Version: 2019.0.11 EPA Home | MyCDX | TRI Program Home | TRI Program Contacts Prev (Activities and Uses) | Save | Next (Water Bodies) Check for Errors





# TRI-ME<sub>WEB</sub>: CAERS HAPS DATA TRANSFER

## CAERS submission must be certified first to be used in TRI-ME<sub>web</sub>

TRI-ME<sub>WEB</sub> JSHRESTHA - CERTIFIER - jensh.shrestha@epi.com (Log out)

My TRI Facility Management - Forms - Submission History Help

Part I 3/4: Activities and Uses/Max On-site 5: On-site Releases 6: Off-site Transfers 7: On-site Waste Management 8: Waste Management 9: Misc. Information

On-site Releases and Disposal Form R, Part II, Section 5 Need Reporting Help? RY 2019 TEXPAR DAINBRIDGE TERMINAL - 31717TXPRN268IN Ammonia

Hover your cursor over the ? icon for more information. Enter data using detailed worksheet.

Form Section	Not Applicable	Total Quantity (lbs)	Numeric Basis	Basis of Estimate
<b>Air Releases</b>				
Section 5.1: Fugitive or Non-Point Air Emissions	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.2: Stack or Point Air Emissions	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
<b>Land Releases</b>				
Section 5.4.1: On-site Underground Injection: Class I Wells	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.4.2: On-site Underground Injection: Class II-V Wells	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.5.1A: On-site Landfills: RCRA Subtitle C	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.5.1B: On-site Landfills: Other	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.5.2: On-site Land Treatment and Application Farming	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.5.3A: On-site Surface Impoundments: RCRA Subtitle C	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.5.3B: On-site Surface Impoundments: Other	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...
Section 5.5.4: Other On-Site Disposal	<input type="checkbox"/>	<input type="text"/> or Select a Range Code		Select a Basis of Estim...

A facility that manages waste rock piles may elect to indicate that at least some of the quantities entered above for Section 5.5 were managed in waste rock piles.  
 Select the checkbox if you would like to indicate that quantities reported in Section 5.5 were managed in waste rock piles.

Click on green button.





# TRI-ME<sub>WEB</sub>: CAERS HAPS DATA TRANSFER

Next, this pop-up will appear, displaying the most recent HAPs record from CAERS.

**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**



# TRI-ME<sub>WEB</sub>: CAERS HAPS DATA TRANSFER

**If you decide not to use the CAERS data, a comment box will appear so that you can provide a rationale for why NEI data were not used.**

**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: Taxpar Energy LLC  
EPA Registry ID : 110002102268  
TRI Facility ID (TRIFID): 317177XPRN268N  
Non-Point Source release amount reported in CY 2019 to NEI (lbs): 0  
Point Source release amount reported in CY 2019 to NEI (lbs): 6,292

**Provide Optional Information Related to NEI data**  
[Please provide any optional information related to why you are not using the available NEI data for this chemical. Information provided here will appear in Section 9.1.]

(4000/4000 characters remaining)

Save and Continue Use Available NEI Data Cancel



## TRI-ME<sub>WEB</sub>: CAERS HAPS DATA TRANSFER

**If you choose to use HAPs data from CAERS, the next steps include:**

- Copy HAPs data into TRI Form R, Section 5
- If all HAPs not included in CAERS, include in Form R
- Complete Form R
- Data validation
- Certify data to complete TRI reporting requirement.



# UPCOMING EVENTS



## UPCOMING EVENTS

- **CDX/CAERS has been open for applicable facilities to submit their 2020 EI since March 8**
  - Georgia EPD is currently reviewing EI data as facilities submit
  - Facilities EI deadline is June 30, 2021
- **Live Virtual Help Sessions (April – June)**
  - Email sign-up will be offered



# LIVE VIRTUAL HELP SESSIONS

- **Attendance Requirements:**
  - Send questions to [emissions.inventory@dnr.ga.gov](mailto:emissions.inventory@dnr.ga.gov) with a screen shot of your problem
    - We will try to address by email first
    - If not resolved by email, we will provide a live help session time slot
- **Help Session Times**
  - Every other Tuesday & Thursday from April 27 – May 27
  - Every Tuesday & Thursday in June
  - Tuesdays: 10-11 AM; Thursdays: 2-3 PM



# RESOURCES

## 1. **GECO EI Application Training PowerPoint and Recording**

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

## 2. **CAERS User guide**

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

## 3. **Past EPA CAERS Webinar Recordings**

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

- CAERS EI User Interface (3/24/21) – Link coming soon
- CAERS EI Bulk Uploading Template (3/31/21) – Link coming soon
- CAERS EI Control Path Webinar (4/14/21) – Link coming soon





# QUESTIONS

**Contact us at:  
[emissions.inventory@dnr.ga.gov](mailto:emissions.inventory@dnr.ga.gov)**





## QUESTIONS FROM HAPS TRAINING (1)

- **What happens with reported HAP emissions if that chemical does not trigger TRI reporting thresholds?**
  - If you are not subject to TRI or the thresholds are not triggered, the HAPs emissions are just kept in CAERS. Voluntary HAPs reporting allows facilities to provide accurate emissions data at the process level. Otherwise, EPA uses HAPs augmentation to establish HAPs emissions in the national emission inventory.



## QUESTIONS FROM HAPS TRAINING (2)

- **For TRI reporting, if a constituent is reported as a range, the average of that range is used. However, for air emissions reporting, the maximum concentration is typically used so emissions for the two reports do not always correspond exactly. Should emissions reported for air emissions purposes be revised/modified when filing the TRI?**
  - Report emissions as required by TRI. You have the option of not keeping the emissions as reported in CAERS. If this is the case, TRI-MEweb allows you to not accept the NEI data and you can leave a comment explaining why you did not use the CAERS data. EPA prefers the total of the reported HAP emissions in the CAERS EI should be the same as the facility-level TRI data since CAERS EI reported process-level HAPs data should sum to the same values in TRI.



## QUESTIONS FROM HAPS TRAINING (3)

- **Are the HAPs reported required to have a PTE > 100 tons/yr?**
  - No, HAPs at any level can be reported.
- **Are any HAPs reported?**
  - Yes, any HAPs can be reported. Voluntary HAPs reporting in CAERS allows facilities to provide accurate emissions data at the process level to the NEI. Otherwise, EPA adds HAPs to facilities where they are not reported by SLTs. First, by using the TRI-reported data and second by relying on SLT-submitted VOC or PM values via HAP augmentation. (EPA 2020 NEI Plan)
  - While the EPA prefers the State-reported HAP emissions for the NEI because they should be at a more detailed process level, the facility-level TRI data and State-reported process-level data should sum to the same values.