



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 Emissions Inventory

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Stakeholder Meeting
July 24, 2023



OUTLINE

- GA HAPs Inventory Overview
- Specific Elements Being Considered
- HAPs Pilot Program Overview
- Proposed Timeline for Implementation
- Federal HAPs inventory Rule Status
- Points of Discussion



GA HAPS INVENTORY PROPOSAL OVERVIEW

- Increased attention to the risks associated with HAP emissions has on a national level.
- EPA inventory currently based on facility Toxic Release Inventory (TRI) estimates and HAP augmentation from criteria air pollutant (CAP) data from the National Emissions Inventory (NEI).
 - These methods do not lead to a reliably accurate inventory for modeling use.
- Develop Georgia-specific HAPs emissions data.
- EPA has plans to make HAPs reporting a federal requirement.



DATA QUALITY COMPARISON

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.



SPECIFIC ELEMENTS BEING CONSIDERED



DE MINIMIS REPORTING THRESHOLDS

- De minimis values are the level at which emissions are considered low enough to be insignificant.
 - For the HAP inventory, de minimis would be based on the facility-wide total for each individual HAP.
- Plan to base the de minimis values on the Minimum Emission Rates (MERs) listed in Appendix A of the Georgia Air Toxic Guidelines.
 - <https://epd.georgia.gov/air-protection-branch-technical-guidance-0/toxic-impact-assessment-guideline>
- MERs (lbs/year) are the emission rate that requires TAP modeling to be performed for air permitting in Georgia.



PROPOSED REPORTING THRESHOLDS

- HAPs have been sorted into groups based on their MER values:

Pollutant Class	MER Value (lbs/year)	Reporting Threshold (lbs/year)
A	<1	All Emissions Reported
B	1-10	≥ 1
C	10-100	≥ 10
D	100-1000	≥ 100
E	>1000	≥ 1000



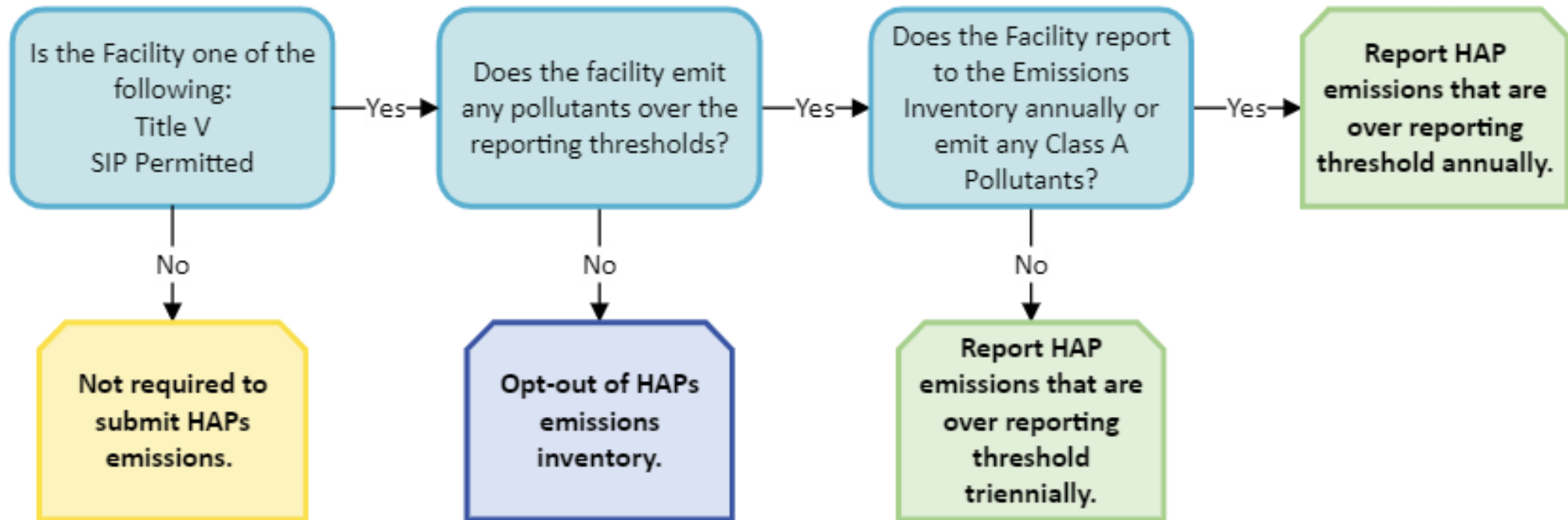
CLASS A POLLUTANTS

- Class A pollutants must be reported regardless of amount emitted.
- Initial list of Class A pollutants:
 - asbestos
 - bis(chloromethyl) ether (BCME)
 - benzidine
 - chromium(VI) Mist
 - chromium (VI), elemental & compounds (as Cr)
 - propyleneimine (1,2-) (syn: 2-methyl aziridine)
 - arsenic, inorganic compounds (as As)
 - tetrachlorodibenzo-p-dioxin (2,3,7,8-)
 - ethylene oxide (oxirane)
 - coke oven emissions
 - nitrosodimethylamine (N-)
 - hydrazine/hydrazine sulfate
 - nickel subsulfide (as Ni)
 - nickel carbonyl (as Ni)
 - beryllium, elemental
 - nickel refinery dust



WHO WOULD REPORT TO INVENTORY

- The HAPs inventory would use the Combined Air Emissions Reporting System (CAERS) for submittal.
- GA EPD already currently uses CAERS for CAP emissions.





EXEMPTIONS BEING CONSIDERED

- Facilities with boilers with a capacity under 250 MMBTU capacity burning natural gas.
- Hospital activities excluding Ethylene Oxide emissions.
- Emergency RICE (including compression and spark ignition).
- Any emissions from an insignificant activity.



GUIDANCE AND ASSISTANCE FOR REPORTING IN CAERS

- Guidance document to provide instruction and resources.
 - Industry-specific emissions factors and examples
 - How to report in CAERS
 - Explanation of threshold and de minimis value
 - Clear list of exemptions
- First time reporting HAPs in CAERS
 - For facilities already in CAERS, use HAP augmentation to estimate initial HAPs
 - For facilities new to CAERS, provide generic calculation and bulk upload sheets based on NAICS



HAPs PILOT PROGRAM OVERVIEW

- EPD's 2022 HAPs pilot program consisted of 5 monthly meetings each focused on different discussion topics. Over 50 people attended each meeting providing valuable specific feedback.
- 15 Facilities voluntarily reported HAPs to CAERS representing the following industries:
 - Pulp and paper
 - Painting and Coating
 - Automotive manufacturing
 - Beverage manufacturing
 - National Security



TENTATIVE TIMELINE FOR IMPLEMENTATION

02/28/23	Initial stakeholder meeting
03/15/23	Comments from initial stakeholder meeting are received
07/24/23	Second stakeholder meeting
08/07/23	Comments from second stakeholder meeting are received
TBD	Proposal process for rule addition in section 391-3-1-.02(6).
06/30/25	Submittal of first HAP emissions data starting in 2024 inventory year for the Title V sources that submit CAP emissions data annually.
06/30/27	First triennial reporting year for the other Title V sources and SIP permitted sources to submit HAP emissions data.



AIR EMISSION REPORTING REQUIREMENTS (AERR) RULE UPDATES

U.S. EPA's proposed "Revisions to the Air Emission Reporting Requirements (AERR)" completed interagency review at the White House Office of Information & Regulatory Affairs (OIRA) on July 11, 2023. U.S. EPA's regulatory agenda listing indicates that the proposed rule is expected to be released in August 2023.

Below is the abstract for the rule:

- This action proposes revisions to the existing Air Emissions Reporting Requirements (AERR) rule last revised on February 19, 2015 (80 FR 8787).
- The EPA is considering how to improve the quality and completeness of hazardous air pollutant (HAP) emissions data from stationary sources and all pollutant emissions data from prescribed fires.
- Further, the EPA is considering how best to quantify emissions from intermittent sources such as backup generators; how to obtain data from facilities in Indian country when a Tribe is not required to report emissions data; and how to address known data gaps, streamline processes, and improve data quality, documentation, and transparency for nonpoint and mobile sources.



POINTS OF DISCUSSION



POINTS OF DISCUSSION

- Any questions/concerns about the methodology for determining de minimis values for insignificant emission levels.
- Thoughts on tiered threshold levels?



POINTS OF DISCUSSION

- Any thoughts/concerns about the list of Class A pollutants?



POINTS OF DISCUSSION

- Any thoughts/concerns about the approach for determining who needs to report and how often?



POINTS OF DISCUSSION

- Any concerns about the exemptions currently listed?
- Any other exemption suggestions?
 - If yes, please explain why.



POINTS OF DISCUSSION

- What would be useful as training and guidance materials?
- How willing would you as a facility to use any HAP calculation tools?
 - CAERS
 - Spreadsheets



QUESTIONS

General Questions?





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To access the recording, please visit:

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