

Annual Operating Report (AOR) and Title V Fee **Frequently Asked Questions**

2016 AOR

I. AOR Submittal Deadline

- 1. When is the 2016 AOR submittal deadline?**
The AOR submittal deadline is April 1, 2017.
- 2. When is the Annual Title V Emissions Fee payment deadline?**
Fees only apply to Title V sources. Fee payment must be post marked or received by April 1, 2017.
- 3. How can a Title V facility check if DEP has received the payment?**
The EAOR website will be updated weekly with payments received. However, please keep in mind posting on the website may take two weeks or more *after* receipt of payment by DEP due to the lengthy amount of processing time involved.
- 4. Must all facilities use the EAOR software to submit their AOR?**
Each Title V source must use DEP's EAOR software, unless the Title V source claims a technical or financial hardship. Non-Title V sources are encouraged to use the software as well.
- 5. AOR Form and Instructions**
The AOR form and instructions were amended in August 2014 to provide additional instructions for Title V emissions fee calculation. In addition, pollutant names for particulate matter were clarified to include 'Filterable' in their description (i.e. PM-Filterable, PM10-Filterable, and PM2.5-Filterable).

II. Title V Fee Calculations

- 6. Which pollutants are considered in the Title V Fee calculations?**
All pollutants (except for carbon monoxide or greenhouse gases) for which emissions are subject to a numerical limit, including facility or multi-unit emissions caps, in a valid Title V Source air construction or air operation permit condition.
NOTE: If the pollutant is subject to a numerical limit in a permit condition, the pollutant will be marked with an "*" in EAOR, and in Section II, E. (2)1. of the computer-generated, partially-prefilled form.
- 7. How are the Title V Fee calculations performed?**
Title V sources using the EAOR software do not calculate their fees. The EAOR software automatically generates a Title V Fee Invoice based on the emissions data submitted. Each Title V source must submit the AOR using the DEP's EAOR software, unless the Title V source claims a technical or financial hardship. Once the report is submitted, then fees are calculated.

For report year 2014 and beyond, the applicable fee factor is set at \$30/ton of pollutant(s) emitted. Additional information is available at the Title V Annual Emissions Fee On-line Information Center available at: <http://www.dep.state.fl.us/air/emission/tvfee.htm>.

- 8. Where do I obtain my Title V Source Emissions Fee Invoice?**
Once you submit your AOR electronically, you can obtain your Title V Fee Invoice here: <https://fldep.dep.state.fl.us/air/emission/eaor/aor.asp>. Submission of payment as indicated on the Title V Fee Invoice must be post marked or received no later than April 1st to avoid the statutorily required late fees.

III. Reportable Pollutants

9. Which pollutants do I need to report?

You need to report pollutants which are subject to an emission limiting standard and also need to report pollutants which are subject to a reporting threshold as described in the AOR form, for example:

- **Report Pollutants Subject to Emission Limiting Standards:**

For **any pollutant** that is subject to a numerical emission limiting standard, either by rule or permit condition, report the pollutant, for each SCC. Pollutants subject to emission limiting standards are generally marked on the EAOR and prefilled AOR form. This also includes any pollutant which is part of a facility-wide or multi-unit emissions cap. If the permit contains a numerical emissions limiting standard for “any” hazardous air pollutant (HAP), without specifying a particular HAP, then report emissions for each HAP with emissions equal to or greater than 1000 pounds per year; and

- **Report Pollutants Subject to Reporting Thresholds:**

For criteria/precursor pollutants, individual hazardous air pollutants, and other pollutants as listed in the AOR form that are emitted from the unit but **not** subject to any numerical emission limiting standards, report for each pollutant, for each SCC, only if the pollutant was emitted from the emissions unit during the reporting year in an amount, by SCC, equal to or greater than the appropriate pollutant-specific threshold listed in the AOR form. Pollutants need not be reported for any SCC for which the emissions were less than the appropriate threshold. Please note the reporting year frequency in the AOR form for pollutants subject to a reporting threshold, for example:

- For each criteria/precursor pollutants, and other pollutants as listed in the AOR form which are **not** subject to any numerical emission limiting standards but are subject to a reporting threshold, the threshold reporting requirements apply annually.
- For each hazardous air pollutant as defined in the AOR form which is **not** subject to any numerical emission limiting standard but is subject to a threshold, the reporting threshold requirement applies for reporting year 2008 and at three-year intervals thereafter (e.g., for reporting years 2011, 2014, 2017, etc.).

10. How do I report PM, PM₁₀, and PM_{2.5} emissions using the primary, filterable, and condensable emission factors?

Depending on the SCC and control equipment configuration, there may be emission factors for primary PM, primary PM₁₀, primary PM_{2.5}, filterable PM, filterable PM₁₀, filterable PM_{2.5} and condensable PM. {NOTE: ‘primary PM’ is not reported. Rather, filterable PM is reported}. When reporting, please keep in mind the following relations and double check you are using the appropriate emissions factor for the pollutant:

$$\begin{aligned} \text{PM filterable} &\geq \text{PM}_{10} \text{ filterable} \geq \text{PM}_{2.5} \text{ filterable} \\ \text{PM}_{10} \text{ primary} &\geq \text{PM}_{2.5} \text{ primary} \geq \text{CPM} \end{aligned}$$

The emission factors listed as primary include both the filterable and condensable components. For example, primary PM_{2.5} is the total of PM_{2.5} filterable plus condensable PM (CPM). Primary PM₁₀ is the total of PM₁₀ filterable plus CPM.

- $\text{PM}_{2.5} \text{ primary} = \text{PM}_{2.5} \text{ filterable} + \text{CPM}$
- $\text{PM}_{10} \text{ primary} = \text{PM}_{10} \text{ filterable} + \text{CPM}$

You should never add the emission factors for primary and filterable together, since primary already includes the filterable.

If reported, report condensable PM₁₀ and condensable PM_{2.5} as CPM.

- $\text{PM}_{10} \text{ condensable} = \text{PM}_{2.5} \text{ condensable} = \text{CPM}$

11. What if I don’t know my CPM (condensable particulate matter) emissions?

CPM emissions must be reported if the emissions unit is subject to a numerical emission limit for CPM. Otherwise, CPM should be reported if information is available to estimate emissions, and such emissions are equal to or greater than 5.0 tons per year per SCC. Do not add the pollutant CPM in EAOR if you do not have emissions data to report. A calculator to estimate CPM emissions based on some available CPM emissions factor information from AP-42 is provided for you at this link:

<http://www.dep.state.fl.us/air/emission/eaor/CPM-reporting.htm>

12. Should TBAC (t-butyl acetate) be included in my VOC emissions?

TBAC emissions should not be included in VOC emissions, but must be reported separately on an annual basis, if TBAC emissions exceed the reporting threshold (5 tons per year per SCC).

IV. Reporting Hazardous Air Pollutant (HAP) Emissions

13. Which HAP emissions should I report on my AOR?

- If a HAP has a numerical emission limit, then you must report that HAP, regardless of the quantity.
- If the permit contains a numerical emission limit for “any” HAP, without specifying a particular HAP, then you must report, for each SCC, each HAP with emissions equal to or greater than 1000 pounds per year at that SCC.
- Report year 2016 is not a HAP-reporting year.

14. Do I need to report HAPs if my facility is not a major source for HAPs?

Yes, you must if the HAPs are subject to numerical emission limits as set forth above. Otherwise, facilities are encouraged to report any available HAPs data on a voluntary basis, even if it is not a required HAPs reporting year.

15. How often must I report HAPs?

If your facility has a numerical emission limit for a given HAP, or for “any” HAP without specifying a particular HAP, then you must report annually. Otherwise, you must report HAPs every three years starting with the report for calendar year 2008 and continuing with the reports for calendar years 2011, 2014, 2017, etc.

NOTE: While reporting of HAPs without numerical limit is required only every three years, DEP encourages facilities to report HAPs every year if data is available.

V. Emissions Method Codes

16. What are the emissions method codes?

The Emissions Method Codes identify the hierarchy for calculating emissions. See question #17 below. The codes are:

- 1A: CEMS – This entry indicates that the emissions were determined based on emissions measurement using a continuous emissions monitoring system (CEMS).
- 2: Material balance – This entry indicates that the emissions were calculated by the use of materials balance and knowledge of the process.
- 3A: Emissions factor – This entry indicates that the emissions were calculated using an emission factor based on site-specific data such as stack test data.
- 3B: Emissions factor – This entry indicates that the emissions were calculated using a directly applicable emission factor from AP-42, the EPA FIRE system or other published emissions calculation source.
- 4: Emissions factor – This entry indicates that the emissions were determined based on a similar, but different, process in AP-42, the FIRE system or other published emissions calculation source. Code 4 should only be used when no directly applicable emission factor is included in these documents.
- 5: Emissions factor – This entry indicates that the emissions were calculated using an emission factor other than one listed above.

NOTE: There is no 1B emissions method code. The previous emissions method codes 1 and 3 have been retired. They have been replaced with 1A, 3A and 3B.

17. Is there a ranking order with the methodology?

Yes. It is ranked as method code 1A, 2, 3A, 3B, 4, and 5. The methods are listed in rank order of required use per Rule 62-210.370, F.A.C. In other words, if you have a qualifying CEMS, you must use data from the CEMS to determine your annual emissions, unless you demonstrate that one of the other methods is more accurate. See Rule 62-210.370, F.A.C., for instructions on how to compute actual emissions:

http://www.dep.state.fl.us/air/rules/fac/62-210_08-25-2014.pdf.

18. If I use an emission factor based on site-specific stack test data, which stack tests must I use to calculate the average value?

Use all the valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.

19. Reporting Other Emissions

20. When should I report fugitive emissions?

You should report fugitive emissions when:

- a. Associated with a permitted emissions unit and SCC for which all emissions are fugitive and are quantifiable (e.g., landfill, cooling pond, etc.); or
- b. Associated with a permitted facility for which an emissions unit has been established by the permitting authority to represent facility-wide fugitive emissions (e.g., equipment leaks, maintenance painting, etc.)

NOTE: Fugitive PM emissions from vehicular movement or wind erosion need not be reported unless it is required by permit.

21. Do I have to report a summer season daily process rate or daily fuel usage rate? Do I have to report summer season daily emissions?

Yes. The summer season reporting requirement applies to all facilities statewide for units emitting NO_x or VOC. You only have to report daily emissions (lbs/day) for NO_x and VOC. You can report an average value or a typical work day value of the summer season. The summer season runs from June 1 to August 31.

22. Electronic Annual Operating Report Version 2015-1

23. What is EAOR and where can I obtain a copy for my facility?

EAOR is the Electronic Annual Operating Report software product that allows you to submit your Annual Operating Report to Florida DEP electronically. You can download the software using this link:

<http://www.dep.state.fl.us/air/emission/eaor/>.

24. What is the latest version of EAOR?

The latest version of EAOR is 2015-1. You must have this version in order to submit your 2016 EAOR.

25. What operating system must I have on my computer in order to use EAOR?

This application requires one of the following operating systems: Windows XP or Windows 7. The Division of Air Resource Management has not tested this application on Windows Vista or Windows 8/10 operating systems.

26. Where do I get my AOR data?

You can download your facility's data by importing it from DEP using the "Import from Web" option on the EAOR Easy Start Menu. Once EAOR is successfully installed on your computer, the Easy Start Menu will appear when you open the program. Click on the "Import from Web" option and the import window will appear. Then enter your facility ID # and 2016 as the Reporting Year.

27. What should I do if I cannot import my facility data?

You should check to make sure the EAOR version is 2015-1. In EAOR go to 'Help' on the Menu bar, and click on 'About EAOR'. If the version is not **2015-1**, then you should install version 2015-1. If you still cannot import, or please call Dianne Spingler at 850-717-9100, or email the Division of Air Resource Management at EAOR@dep.state.fl.us.

28. Can I still submit my 2016 AOR data using the hardcopy form?

You can download a partially pre-filled copy of your facility's hardcopy form using this link: https://fldep.dep.state.fl.us/air/emission/eaor/aor_hardcopy.asp. However, each **Title V** source must submit the AOR using the DEP's EAOR software, unless the Title V source claims a technical or financial hardship. A Title V source that does not submit an electronic version of the AOR report greatly increases the possibility of Annual Emissions Fee calculation errors which could result in an underpayment of the Annual Emissions Fees leading to the imposition of the required 50% late fee plus interest penalty. (Note: Please see question **30.** below for **where to send hardcopy** forms, including hardcopy signature pages based on whether your facility is Title V or Non-Title V).

29. Who should sign my AOR?

For non-title V sources, the Owner or Authorized Representative must sign. For Title V sources, the Title V Source Responsible Official must sign. If there is more than one Responsible Official at the Title V Source, it is not necessary that this person be the Primary Responsible Official.

30. If I electronically sign, do I still need to send in the signature pages?

No. If the AOR is submitted electronically via the web, or via email, then you can sign the AOR electronically. *The AOR is not complete until it is signed.* In order to sign electronically, you will need an air user account and PIN. Information on how to sign electronically, register for a user account, and downloading a PIN request form can be found here: <http://www.dep.state.fl.us/air/emission/eaor/>.

If you are a **Title V** facility and submitting a hardcopy form or only the first two pages with the signature page signed, then please send to DEP as a scanned version by electronic mail (to: EAOR@dep.state.fl.us) or by hardcopy using regular mail to the following address:

Florida Department of Environmental Protection
Division of Air Resource Management, MS 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

If you are a **non-Title V** facility and submitting a hardcopy form or only the first two pages with the signature page signed, then please send to the appropriate DEP district or DEP local air pollution control program office at the address provided in the links below:

For DEP district offices: http://www.dep.state.fl.us/air/about_us/district_contacts.htm

For local program offices: http://www.dep.state.fl.us/air/about_us/local_contacts.htm

If you have questions or need assistance, please contact Dianne Spingler at (850) 717-9100. You can also email questions to EAOR@dep.state.fl.us.

Don't see your question? Send one to EAOR@dep.state.fl.us