

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

2017 AOR

I. AOR Submittal Deadline

1. When is the AOR submittal deadline?

The AOR submittal deadline is April 1 (Note: April 1 falls on a Sunday this year.)

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.

3. How can a Title V facility find out if DEP has received the payment?

The EAOR website will be updated weekly with a list of payments received. However, please keep in mind posting on the website may take two weeks or more *after* receipt of payment by the DEP due to the lengthy 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 by submitting a partially pre-filled form. Non-Title V sources are encouraged to use the software as well.

(Regarding Pre-filled forms: Please consult the EAOR webpage <https://floridadep.gov/air/permitting-compliance/content/annual-operating-report>).

5. AOR Form and Instructions

The AOR form and instructions were updated in June 2017, and include the following significant changes:

- Removal of requirements to report summer season daily process rates and emissions, including seasonal operational data (i.e. removal of Percent Hours of Operation by Season, Average Summer Season Operation, and Total Operation During Summer Season).
- Reporting requirements for individual hazardous air pollutants and Total HAPS were revised to include both major and non-major sources of hazardous air pollutants.
- Pollutants were added to accommodate new federal regulations; more accurate reporting.
- Reporting thresholds for some pollutants were revised or added.
- View the revised AOR form and instructions on the EAOR webpage (or click on the following link: [Annual Operating Report form with instructions, effective June 2017](#)).

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 and an Invoice is generated.

The applicable fee factor is set at \$30/ton of pollutant(s) emitted. Additional information is available at the Title V Annual Emissions Fee Online webpage:
<https://floridadep.gov/air/permitting-compliance/content/title-v-fees>

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 by going to the AOR Submittal Search webpage at this link: <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.

9. Where do I send Title V Source Emissions Fee payment?

Send the Invoice and check made out to 'Florida Department of Environmental Protection' to:
Major Air Pollution Source Annual Emissions Fee
P.O. Box 3070
Tallahassee, Florida 32315-3070

III. Reportable Pollutants

10. 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 *if* the threshold was met (pollutant thresholds are listed in the AOR form instructions):

- **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, even if quantities emitted are small. Pollutants subject to emission-limiting standards are generally marked with an asterisk (*) on the EAOR form and the computer-generated, partially-prefilled AOR form. This also includes any pollutant which is part of a facility-wide or multi-unit emissions cap.

- **Report Pollutants Not Subject to Emission-Limiting Standards:**

- For pollutants as listed in the AOR form instructions that are emitted from the unit but not subject to any numerical emission limiting standards, report the pollutant, for each SCC if the pollutant was emitted in an amount, by SCC, equal to or greater than the pollutant's specific threshold listed in the AOR form instructions. Pollutants need not be reported for any SCC for which the emissions were less than the appropriate threshold.

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

The AOR form instructions were updated in 2017 to clarify particulate matter **code** descriptions:

- Particulate Matter, Condensable – **CPM**
- Particulate Matter, Filterable – **PM**
- PM₁₀, Filterable - **PM10**
- PM₁₀, Primary (PM₁₀ + CPM) - **PM10-PRI**
- PM_{2.5}, Filterable – **PM2.5**
- PM_{2.5}, Primary (PM_{2.5} + CPM) – **PM2.5-PRI**

“Particulate matter” (PM) is the general term to describe solid particles and liquid droplets found in the air.

The composition and size of the airborne particles/droplets varies. Some can be seen as dust or dirt, while others are too small to be seen without a microscope. Two size ranges known as PM₁₀ and PM_{2.5} are commonly monitored. According to their measured aerodynamic diameter, PM₁₀ includes particles less than or equal to 10 microns, and PM_{2.5} includes particles less than or equal to 2.5 microns.

PM emitted directly to the atmosphere can exist as solid or liquid matter (the “filterable” portion) or as gases (the “condensable” portion).

Depending on the SCC and control equipment configuration, there may be emission factors for various particulate matter pollutants, so please make sure you are using the correct emission factor for the pollutant being reported.

The emission factors listed as **primary** simply means they include the *filterable* and *condensable* components of particulate matter. For example, primary PM_{2.5} is the sum of PM_{2.5} Filterable plus the condensable (CPM) particulate matter.

Notice that the primary pollutants below must **equal** the sum of their filterable and condensable components:

- PM_{2.5} primary = PM_{2.5} filterable + CPM
- PM₁₀ primary = PM₁₀ filterable + CPM

When reporting “condensable” PM₁₀ or “condensable” PM_{2.5}, report this as **CPM** (condensable particulate matter).

12. 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.

An optional calculator tool to estimate CPM emissions based on some available CPM emissions factor information from AP-42 is provided for you at the link below. However, if a higher ranked or more accurate method of calculating emissions is available to you other than AP-42, then per Rule 62-210.370, F.A.C. that method must be used for computing emissions for the AOR:

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

IV. Reporting Hazardous Air Pollutant (HAP) Emissions

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

- If a HAP has a numerical emissions limit, then you must report that HAP, regardless of the quantity.
- Or, if it is a “HAP reporting year”, and the individual HAP or Total HAP emissions met the threshold as described in the AOR form and instructions, then report the HAP.

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

Yes, both major and non-major sources must report if the HAP is subject to a numerical emission limit, or if it is a “HAP reporting year” and the HAP or Total HAP emissions met the threshold as described in the AOR form and instructions.

15. How often must I report HAPs?

If your facility has a numerical emission limit for a given HAP, then you must report annually. Otherwise, for each HAP or Total HAP not subject to an emission-limiting standard, the reporting requirement applies only for reporting year 2017 and every third year thereafter (e.g., for reporting years 2020, 2023, etc.) referred to as a “HAP reporting year”.

16. Is 2017 a HAP reporting year?

Yes.

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

V. Emissions Method Codes

17. 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.

18. 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: Click here to [View Rule 62-210.370](#) for methods to be used when computing actual emissions.

19. 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.

20. Reporting Other Emissions

21. 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.

22. 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?

No. The summer season reporting requirements were removed from the AOR, DEP form 62-210.900(5), effective June 22, 2017.

23. Electronic Annual Operating Report Version 2017-1

24. 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 go to the EAOR webpage and download the software and installation instructions using this link:

<https://floridadep.gov/air/permitting-compliance/content/annual-operating-report>

25. What is the latest version of EAOR?

The latest version of EAOR is 2017-1. You must have this version in order to submit your 2017 EAOR.

26. 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, however some facilities have reported it works with Window 10.

27. 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 seven-digit facility ID # and 2017 as the Reporting Year.

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

You should check to make sure the EAOR version is **2017-1**. In EAOR go to 'Help' on the Menu bar, and click on 'About EAOR'. If the version is not 2017-1, then you should install version 2017-1. If you still cannot import your file, then please call Dianne Spingler at 850-717-9100, or email the Division of Air Resource Management at EAOR@dep.state.fl.us.

29. Can I still submit my 2017 AOR data using the hardcopy form?

You can download a partially pre-filled version for your facility to complete 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).

30. 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.

31. 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 created in EAOR and submitted 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. The PIN is given to the *individual* signing, not to the facility. 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: <https://floridadep.gov/air/air-director/content/district-air-contacts>

For local program offices <https://floridadep.gov/air/air-director/content/local-program-air-contacts>

Note: For a Compliance Assurance Program, scroll to view the Compliance Assurance Air contact or compliance contact.

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