



EAOR Training

Tuesday, January 24, 2017

EAOR Training Overview

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- Welcome to the yearly EAOR Training.
- You are encouraged to ask questions by typing in your questions on your screen. We will answer as many questions as we can after each section and at the end of the webinar.
- PLEASE **mute** your phone if not asking a question.
- PLEASE **do not** put this call on hold.
- If you encounter problems with the audio or other technical problems during the webinar, please let us know via the questions message pane.

EAOR Training

January 24, 2017



Agenda

- 1:30 PM Opening Remarks
EAOR Website: Links and Downloads

- 2:00 PM EAOR Training: Easy Start Menu
EAOR Training: Static Data/Facility Form Sections A-D and Attachments

- 2:30 PM EAOR Training: EU Form Sections A-D
EAOR Training: EU Form Section E, Reports, Data Submission, Title V Fee Invoice and Electronic Signature

- 3:00 PM Questions

2016 EAOR

- For the 2016 AOR use EAOR software version 2015-1 (this is the same version as was used for last year's AOR, i.e. the 2015 AOR.)
- EAOR Version 2015-1 Changes (these changes were implemented last year for the 2015 AOR):
 - In EAOR pollutants were added to accommodate reporting in EAOR (or tracking in our main system):
 - CO₂ – Carbon Dioxide
 - CO₂E – Equivalent Carbon Dioxide
 - HC + NO_x – Hydrocarbons plus Nitrogen Oxides
 - In EAOR version 2015-1, data verifications were added to improve data quality and Title V fee calculations:
 - PM must be greater than or equal to PM₁₀ for each SCC.
 - PM₁₀ must be greater than or equal to PM_{2.5} for each SCC.
 - PM₁₀-Pri must be exactly equal to PM₁₀ + CPM for each SCC.
 - PM_{2.5}-Pri must be exactly equal to PM_{2.5} + CPM for each SCC.
 - Total HAPS must be greater than or equal to the sum of individual HAP pollutants for each SCC.

For example:

If emissions for PM_{2.5}-Pri = 1.0005 tons/year, then emissions for PM_{2.5} + CPM must add up to *exactly* 1.0005.

If emissions for total HAPS = 1.5 tons/year, then the sum of individual HAPs (H001 through H189, PB, D/F, and THC) must add up to 1.5 tons/year or less.

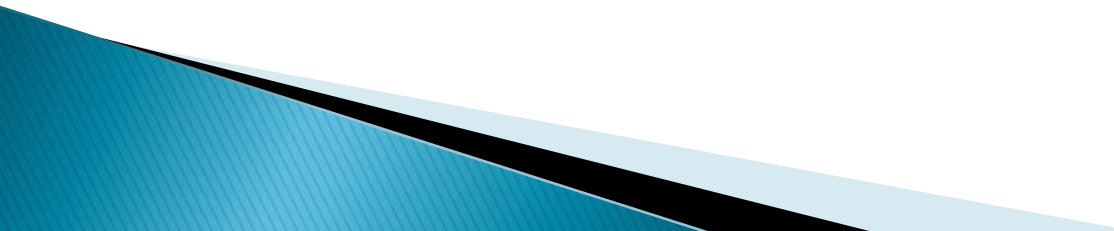
Summary of Changes in Version 2015-1 continued

Regarding Individual HAPS (!)

Although Individual HAP pollutants includes H001 – H189, PB, D/F, and THC, please note pollutant codes H029 and H120 have been removed from the list of HAP pollutants, so please do not report **H029** and **H120** emissions using these codes anymore.

- ▶ **H029** (Caprolactam) – In EAOR there is not a replacement pollutant code for H029. If H029 is a pollutant for your facility in EAOR, then either enter 0, below threshold, or invalid pollutant.
- ▶ **H120** (Methyl Ethyl Ketone or MEK) – H120 (MEK) is a VOC. In EAOR, if you have ‘H120’ pollutant code, then enter 0 or below threshold and **include any MEK (H120) emissions under pollutant code ‘VOC’**.

Electronic Annual Operating Report Benefits

- ▶ The completed report can be submitted by the Internet.
 - ▶ The report is partially filled with the data from the Department database. This ensures the report is completed according to each facility's permit.
 - ▶ The side-by-side view allows comparison of the current year data with the data from previous years.
 - ▶ Data changes are highlighted to ease the review of the data.
 - ▶ Help is available at one key stroke, including the definitions of each data field.
 - ▶ Formulas to calculate emissions can be set up in the program and be re-used in future AORs.
 - ▶ Edit checks are included to catch missing data.
 - ▶ Supporting electronic documents can be attached.
 - ▶ The data are reviewed and transferred into the Department database electronically, avoiding having to enter the new data and update the existing data manually.
 - ▶ Reports can be saved as .PDF files. With this feature, you can send the completed AOR to someone else to review, without that person having to install the EAOR program.
 - ▶ Automatically calculates Title V fees based on the AOR emissions reported (Title V sources only).
 - ▶ The report can be signed electronically.
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When Completing EAORs:

- ▶ **CPM, PM_{2.5}, and PM₁₀ should typically be reported for combustion sources.**
 - If the information is available and the reporting threshold of 5 tons/year was exceeded (or CPM is a marked pollutant), then report the emissions. At the following link a tool is available to help estimate CPM emissions for some SCC:
 - [Condensable Particulate Matter \(CPM\) Reporting Threshold, and Estimated Annual CPM Emissions Calculator for some SCC](#)

- ▶ **Make sure to use the correct Emission Factor (EF) for the pollutant!**
 - Especially when reporting PM, PM₁₀, and PM_{2.5} emissions, EFs used were for the wrong pollutant. For example, AP42/webfire PM EF was used to report PM₁₀.
 - 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 (CPM). *Note: primary PM is not reported, however filterable PM is reported.

- ▶ **Make sure emission factors have the correct Units and units in EAOR make sense in your equations:**
 - For example, if AP42/webfire has an EF of $7.600\text{E}-2$ *Lb per Million Btus Fuel Input*, and the EAOR worksheet has an 'Emission Factor' unit of *Lbs/1000 Gallons Distillate Oil (Diesel) Burned*, then do not enter .076 Lb per Million Btus Fuel Input as the 'Emission Factor' in EAOR (i.e. row B15 on the worksheet).

Completing EAORs continued

- ▶ **Make sure the correct Emissions Method Codes** used to calculate emissions are reported:
 - Provide the source of the emissions factor in EAOR. For example, if emissions were calculated using an EF based on site specific data such as stack tests, then list the test dates and EF; or if the EF was established in a permit, then reference which permit.
 - Rule 62–210.370(2)(d)1.c., F.A.C., states “The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator **shall not** compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.”
 - [Click Here to see Rule 62–210.370 for methods to be used when computing actual emissions.](#)
- ▶ **Make sure supporting information is attached in EAOR:** Helps communicate the whole picture to us and saves time otherwise spent on follow-up questions to the facility (especially important when Emissions Calculation worksheet or Emissions Comment field does not contain the calculation.)
- ▶ **Double check your calculations,** a minor omission could result in either underreporting emissions (and be subject to Title V fee penalties); or over reporting emissions (and overpaying fees).
 - Now that EAOR calculates Title V fees based on actual emissions, it is best to make the effort and find discrepancies now and correct them, so going forward compliance issues are not perpetuated.

Report Pollutants Subject to an Emission Limiting Standard or Threshold, 1

- ▶ **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 should be ‘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 emission 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; or
- ▶ Note: A ‘marked’ pollutant is one which has a numerical emissions limit or emissions cap in the permit and will have an * next to the pollutant in EAOR (for example *PM).

Report Pollutants Subject to an Emission Limiting Standard or Threshold, 2

▶ 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 2014 and at **three-year intervals** thereafter (e.g., for reporting years 2017, 2020, etc.).

Report Pollutants Subject to an Emission Limiting Standard or Threshold, 3

▶ 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, you must report annually. Otherwise, you must report HAPs every three years (e.g. for calendar years 2014, 2017, etc.)
- **NOTE:** While reporting of HAPs without a numerical limit is required only every three years, and 2016 is not a ‘HAP’ reporting year, DEP encourages facilities to report HAPs every year if data is available.

Reporting CPM; Pollutant Emissions Calculators

► What if I don't know my CPM (condensable particulate matter) emissions?

(Note: The following emissions calculators are provided for your use, however their use to estimate emissions is optional):

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>

Below is a link to the Annual Air Emissions Calculators (based on WebFIRE Emissions Factors) for some SCC. If you would like additional SCC's added, then please email them to Cindy.Phillips@dep.state.fl.us

- [Annual Air Emissions Calculators for some SCC](#)

Reporting PM, PM₁₀, and PM_{2.5}

- ▶ **When reporting PM, PM₁₀, and PM_{2.5} emissions make sure to use the correct emission factor for the pollutant!**

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 (CPM).

- PM filterable $\geq$ PM₁₀ filterable $\geq$ PM_{2.5} filterable
- PM₁₀ primary $\geq$ PM_{2.5} primary $\geq$ CPM

(NOTE: 'primary PM' is not reported. Rather, PM determined by standard EPA Method 5 is filterable PM, which is reported.)

- ▶ 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), and primary PM₁₀ is the total of PM₁₀ filterable plus CPM.
 - PM_{2.5} primary = PM_{2.5} filterable + CPM
 - PM₁₀ primary = PM₁₀ filterable + 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.
 - PM₁₀ condensable = PM_{2.5} condensable = CPM

Before Beginning EAOR Data Entry:

- ▶ In EAOR, first check to make sure you have downloaded the newest version of EAOR software: **EAOR 2015-1**.
- ▶ After importing your facility data, please review your prefilled facility data in EAOR before completing the report.
 - If there is an error in the prefilled data, such as the emissions unit list is inaccurate (e.g. the permit lists one EU, but EAOR has two EUs etc.) or a pollutant which should be 'marked' in EAOR is not marked (*), then please call DARM before starting your EAOR data entry. This is to prevent you from possibly having to redo your entire EAOR data entry!
- ▶ If you are adding SCCs in EAOR, and there is any question regarding it's use then please first check with the permitting office, and cc DARM.
- ▶ Remember for the 2016 AORs, the RICE – Emergency / Limited Use/Black Start Engines units that have numerical emissions limits for any pollutant or meet the threshold are to be included in AORs as they have not been exempted from the 2016 AOR form instructions by rule revision.

EAOR Website: Links and Downloads

- ▶ EAOR Website has information pertinent to EAOR:
<http://www.dep.state.fl.us/air/emission/eaor/default.htm>

- ▶ The 2016 AOR and Title V Fee is due by April 1, 2017.
 - Title V facilities must submit the AOR using EAOR software (or claim technical or financial hardship by submitting Division's prefilled form).
 - Title V emissions fee checks must be postmarked no later than April 1, 2017.
 - Electronic banking transfer submissions received by DEP by April 1, 2017.
 - The Title V Emissions Fee website is here:
<http://www.dep.state.fl.us/air/emission/tvfee.htm>

- ▶ Electronic Annual Operating Report Version 2015-1:
 - EAOR software allows you to submit your Annual Operating Report to Florida DEP.
 - The latest version of EAOR is 2015-1.
 - EAOR software requires: Windows XP or Windows 7.
 - Non-Title V facilities may submit their AOR using a pre-filled hardcopy. **Download a prefilled copy** at this link (however Title V must use EAOR as mentioned above):
https://fldep.dep.state.fl.us/air/emission/eaor/aor_hardcopy.asp

Signing the 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, then it is not necessary that this person be the Primary Responsible Official.
- ▶ Whether the AOR is submitted electronically via the web or email, you can sign the AOR electronically. *The AOR is not complete until it is signed.*
- ▶ Please note: In order to sign electronically, you will need a user account and PIN. (Information on how to sign electronically, register a user account, and downloading a PIN request form can be found on the EAOR website (<http://www.dep.state.fl.us/air/emission/eaor/default.htm>):
 - [Click Here to Register an Account](#)
 - [Download PIN Request Form \(requires login\)](#)
- ▶ If you forgot your PIN or registration password or need signing help:

DARM Application Support Desk
Email: DARM.HelpDesk@dep.state.fl.us
Phone: 850-717-9000 (Fax: 850-717-9001)



EAOR – Links to DEP

- ▶ **EAOR Website**

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

- ▶ **Title V Annual Emissions Fee On-line Information Center**

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

- ▶ **AOR Form (including instructions)**

<http://www.dep.state.fl.us/air/rules/forms/aor.htm>

- ▶ **FDEP incoming FTP site:**

<ftp://ftp.dep.state.fl.us/pub/incoming>

- ▶ **AOR Form & Instructions in Notice of Rule Development (Rule 62-210.900)**

<http://www.dep.state.fl.us/air/rules/regulatory.htm>

EAOR – Links to EPA



- ▶ EPA's WEBFIRE (contains EPA's recommended emissions factors)
<https://www.epa.gov/electronic-reporting-air-emissions/webfire>
- ▶ EPA's Searchable SCC database (contains a list of most updated SCCs):
www.epa.gov/scc.



EAOR Training Wrap-up

Tuesday, January 24, 2017

Webinar Survey

Please take time to complete the survey at the conclusion of the webinar .

Questions / Assistance Contacts



Dianne Spingler, AOR Coordinator
Florida Department of
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Dianne.Spingler@dep.state.fl.us
850-717-9100

Kathleen Carr

Contact Kathleen – register an account,
forgot PIN or password.

Kathleen.Carr@dep.state.fl.us
850-717-9012

EAOR Helpdesk

eaor@dep.state.fl.us
850-717-9000

Other Assistance

Cindy Phillips, Senior Analyst

Contact Cindy re: Emissions Calculator for SCCs,
AOR form rule development.

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850-717-9098

Kris Lanh, Engineer

Contact Kris with general AOR questions.

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