EAOR Training

January 2018
Division of Air Resource Management
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.
Electronic Annual Operating Report (EAOR)

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
• Purpose of Annual Operating Reports
• EAOR Process: Common Issues
• Resources Available
Purpose

Applications

• Annual trend reports
• Emissions trading
• SIP
• Modeling activities
• Compliance demonstrations
• Emissions fees

➢ For the SIP program, the air emission inventory is a fundamental building block in developing an air quality control and maintenance strategy, and depends on a comprehensive, accurate and current inventory of actual emissions.

➢ Regulatory agencies rely on emission inventories as indicators of air quality changes, and produce assessments which help guide efforts to cut air pollution (and in identifying those air toxics which are of greatest concern in terms of contribution to population risk), and for setting permitting requirements.
• Annual AOR Letter
• EAOR Installation
• Completing / Revising EAOR
• Signing EAOR
• Title V Fees (Major sources only)
Annual AOR Letter

• AOR Letter sent in mid-December Includes:
  • Changes since the previous year
  • Pertinent due dates
  • EAOR website and contact.

**Tip:** Please be sure we have the current Primary RO and e-mail address in our system (ARMS).
Changes in 2017 include:

- Removal of Requirements to report **summer season daily** process rates and emissions, including seasonal operational data (i.e. percent hrs operation by season, average and total summer season operation).
- “HAP Reporting Year” reporting changes for hazardous air pollutants (i.e. Individual HAPS & Total HAPS):
  - Expanded the reporting requirements to include **non-major** sources of HAPs during a HAP reporting year.
  - Revised the threshold for Total HAPS.
- Added thresholds for \( \text{H}_2\text{S} \), PM10 - Pri, PM2.5 - Pri.
- Addition of pollutants to accommodate new federal regulations.
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 are small. Pollutants subject to emission limiting standards should be ‘marked’ on the EAOR and our prefilled AOR form. This also includes any pollutant which is part of a facility-wide or multi-unit emissions cap.

*Marked: 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 Reporting Thresholds:

- For 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.
EAOR Installation

• EAOR Website
  • EAOR software & installation instructions
  • Installation errors & links to resolutions:
    • Folder Permissions – read / write permissions
    • Crystal Reports error
    • EAOR program suddenly stops working

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

• Tip: Check the EAOR website for installation error resolutions.
Before Beginning EAOR Data Entry:

• In EAOR, first check to make sure you have downloaded the newest version of EAOR software.

• 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, for example, a pollutant has an emissions limit in the permit but is not ‘marked’ in EAOR (*), or an emissions unit is missing, 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 (or invalidating) an SCC in EAOR, and there is any question regarding which SCC to use, then please first check with the permitting office, and cc DARM.

• Remember the RICE – Emergency / Limited Use/Black Start Engines 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 AOR form instructions.
Please follow the steps below to complete your AOR, start by importing data from web or disk:

1. Import from Web
2. Import from Disk

More menus are available on the menu bar.
After importing your facility data, *first* review it, *then* begin editing:
<table>
<thead>
<tr>
<th>EU ID</th>
<th>EU Description</th>
<th>Pollutant</th>
<th>2016 Actual (TPY)</th>
<th>2015 Actual (TPY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>003</td>
<td>SHOT BLASTING BLDG.</td>
<td>*HAPS</td>
<td>0.84000</td>
<td>1.15600</td>
</tr>
<tr>
<td></td>
<td></td>
<td>*VOC</td>
<td>3.48800</td>
<td>1.56100</td>
</tr>
<tr>
<td>004</td>
<td>Global Paint Booths</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>*PM</td>
<td>0.31000</td>
<td>0.29200</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM10</td>
<td>0.31000</td>
<td>0.29200</td>
</tr>
<tr>
<td>005</td>
<td>Silica Blast Operation</td>
<td>*HAPS</td>
<td>0.490000</td>
<td>0.386700</td>
</tr>
<tr>
<td></td>
<td></td>
<td>*VOC</td>
<td>0.693000</td>
<td>0.223000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>2.75000</td>
<td>1.051000</td>
</tr>
</tbody>
</table>
Completing EAOR: Facility Form

Facility Information:

• Status (as of December 31\textsuperscript{st}) – A, C, Inactive.
• Facility Owner/Comp. & Site Name – Owner.
• Facility History Information – Previous Owner /Company Name if changed during reporting year.

Owner/Contact Information:

Person who is authorized / responsible for signing this AOR:

• Non-Title V: Owner/Authorized Representative or
• Title V: Responsible Official
# EAOR Facility Form - History

## Revised AOR Data 2016

### Section B and B (Cont)

<table>
<thead>
<tr>
<th>8. Facility SIC(s):</th>
<th>9. Facility Comment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIC: 3479</td>
<td>MISC. COATING OF METAL PARTS, HAP &gt; 10 T/yr &amp; &gt; HAPS &gt; 25 T, Previous name Diversified Container Services</td>
</tr>
</tbody>
</table>

### Section D

#### Section D (Cont)

<table>
<thead>
<tr>
<th>8. Facility SIC(s):</th>
<th>9. Facility Comment:</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

## Local ARMS Data 2015

### Section D (Cont 2)

<table>
<thead>
<tr>
<th>8. Facility SIC(s):</th>
<th>9. Facility Comment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIC: 3479</td>
<td>MISC. COATING OF METAL PARTS, HAP &gt; 10 T/yr &amp; &gt; HAPS &gt; 25 T, Previous name Diversified Container Services</td>
</tr>
</tbody>
</table>

### C. FACILITY HISTORY INFORMATION

1. **Change in Facility Owner/Company Name During Year?**
   - [ ]
   - **Previous Name:**
   - **Date of Change:**

### Local ARMS Data 2015

<table>
<thead>
<tr>
<th>8. Facility SIC(s):</th>
<th>9. Facility Comment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIC: 3479</td>
<td>MISC. COATING OF METAL PARTS, HAP &gt; 10 T/yr &amp; &gt; HAPS &gt; 25 T, Previous name Diversified Container Services</td>
</tr>
</tbody>
</table>

### C. FACILITY HISTORY INFORMATION

1. **Change in Facility Owner/Company Name During Year?**
   - [ ]
   - **Previous Name:**
   - **Date of Change:**
### D. OWNER / CONTACT INFORMATION

#### Owner/Authorized Representative OR Title V Responsible Official:

<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>PATTY</td>
</tr>
<tr>
<td>Last Name</td>
<td>SMITH</td>
</tr>
<tr>
<td>Job Title</td>
<td>SENIOR VICE PRESIDENT</td>
</tr>
</tbody>
</table>

#### Mailing Address

<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organization/Firm</td>
<td>CONGLOBAL INDUSTRIES, INC.</td>
</tr>
<tr>
<td>Street Address</td>
<td>9999 ALLEN PARKWAY, SUITE 999</td>
</tr>
<tr>
<td>City</td>
<td>HOUSTON</td>
</tr>
<tr>
<td>State</td>
<td>TX</td>
</tr>
<tr>
<td>Zip</td>
<td>77019 -</td>
</tr>
<tr>
<td>Phone</td>
<td>(713) 999-9999</td>
</tr>
<tr>
<td>Fax</td>
<td>(713) 999-9998</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:psmith@email.com">psmith@email.com</a></td>
</tr>
</tbody>
</table>
• **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 formula.)

• **Other Attachments**
  • Signature Pages may be attached in EAOR (i.e. AOR pages 1 & 2).
  • However, if e-signing, it is not necessary to attach the signature pages in EAOR.
Completing EAOR Continued

- **Make sure the correct SCCs are reported in EAOR:** If you are adding (or invalidating) an SCC in EAOR, and there is any question regarding which SCC to use, then please first check with the permitting office, and cc DARM.

- **Make sure the correct Emissions Method Codes** used to calculate emissions are reported:
  - 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.”
  - [View Rule 62-210.370](#) for methods to be used when computing actual emissions.

- **Make sure to use the correct Emission Factor (EF) for the particular pollutant:**
  - For PM, PM\textsubscript{10}, and PM\textsubscript{2.5} emissions, EFs used were often for the wrong pollutant. For example, AP42/Webfire EF for PM was used to report PM10.
  - Depending on the SCC and control equipment configuration, there may be emission factors for *primary PM*, primary PM\textsubscript{10}, primary PM\textsubscript{2.5}, filterable PM, filterable PM\textsubscript{10}, filterable PM\textsubscript{2.5} and condensable PM (CPM).
Completing EAOR Continued

Make sure emission factors have the correct Units:

• For example, for an SCC for external combustion boilers burning oil, AP42/Webfire units for criteria pollutants are **Lbs per 1000 Gallons Oil**, and units for metals are **Lbs per Million Btus Heat Input**, however EAOR calculation worksheet ‘Emission Factor’ unit is **Lbs per 1000 Gallons Distillate Oil**.

• Provide the source of the emissions factor (EF) 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 units; or if the EF was established in a permit, then reference which permit.

Double check your emissions calculation formula:

• A minor omission could result in either underreporting emissions (and subject to additional Title V fee / penalties); or over reporting emissions (and overpaying fees).

• EAOR calculates Title V fees based on actual emissions, review and correct discrepancies in formula’s, ensure the values used in the formula are correct:
  • Units; convert from lbs to tons
  • Emissions factor
  • Consider control efficiency
  • Process rate / Fuel usage
  • Average heat content
  • Total hours operated

• **CPM, PM2.5, 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 is a marked pollutant), then report the emissions.
A change during the reporting year in the facility’s tracking/reporting methodology resulted in underreporting of emissions (i.e. from AP42- to CEMS);

Different emissions factors are used for reporting in different systems (TRI vs. AOR);

Overestimating previous years emissions;

Instances where the emissions factor or fuel usage/ process rate is off by an order of magnitude; or incorrect value was used in the formula in EAOR;

Duplication of process rate / fuel usage: The exact same process rate was reported for different fuels burned, for example diesel and natural gas;
Instances where materials or substances used in the previous year’s processes were discontinued prior to the current reporting year, however were inadvertently reported anyway;

Cases where emissions were normally calculated by applying a control efficiency, however were inadvertently reported without it;

Emissions value reported was in pounds, conversion to tons was excluded from the formula;

Cases where HAP VOCs are not included with the VOC emissions; and

Formulas needing revision:
  o workbook setup to capture data for the AOR, such as fuel usage, not working;
  o Formula omits an important conversion factor (i.e. conversion of sulfur to SO2);
  o Incorrectly uses a “percentage” (i.e. 10% ash) instead of a “number” (i.e. 0.1 ash fraction), resulting in emissions being over reported (for HAPS metals).
### EAOR Calculation Worksheet

**Calculations for SCC - 20100101, Pollutant - PM**

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<table>
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<th></th>
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<tr>
<td><strong>F17</strong></td>
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<tr>
<td><strong>mB20/E7P4/2000</strong></td>
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</thead>
<tbody>
<tr>
<td><strong>A</strong></td>
<td><strong>B</strong></td>
<td><strong>C</strong></td>
<td><strong>D</strong></td>
<td><strong>E</strong></td>
</tr>
<tr>
<td>1. Average Annual Operation (Hours/Day)</td>
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<tr>
<td>2. Average Annual Operation (Days/Week)</td>
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<tr>
<td>3. Total Annual Operation (Hours/Year)</td>
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<tr>
<td>4. Annual Process or Fuel Usage Rate (1000 Gallons Distillate Oil (Diesel) Burned)</td>
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<tr>
<td>5. Fuel Average % Sulfur</td>
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<tr>
<td>6. Fuel Average % Ash</td>
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<tr>
<td>7. Fuel Heat Content (mmBtu/1000 Gallons Distillate Oil (Diesel) Burned)</td>
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<tr>
<td>8. Average Summer Season Operation (Hours/Day)</td>
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<tr>
<td>9. Average Summer Season Operation (Days/Week)</td>
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<tr>
<td>10. % Hours of Operation DJF</td>
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<tr>
<td>11. % Hours of Operation MAM</td>
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<tr>
<td>12. % Hours of Operation JJA</td>
<td></td>
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<tr>
<td>13. % Hours of Operation SON</td>
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</tr>
<tr>
<td>14. Summer Season Daily Process or Fuel Usage Rate (1000 Gallons Distillate Oil (Diesel) Burned)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>15. Emission Factor (lbs/1000 Gallons Distillate Oil (Diesel) Burned)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>16. Total Operation During Summer Season (Days/Season)</td>
<td></td>
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</tr>
<tr>
<td>17. Annual Emissions (Tons/Year)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>18. Summer Season Daily Emission (Lbs/Day)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Emission Comments</td>
<td>See attached calculations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20. Emission Factor (lb / MMBTU)</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

**Show Calculation, Show Comment**

**Save, Cancel, Clear Sheet, Import**
Perform Edit Checks & Compare to ARMS:

• Missing AOR Report
• Missing Process Rates
• Missing Annual Emissions
• Missing Cap Emissions
• Missing data for SCC (if burning Coal, Oil, Gas) – lists SCC if the sulfur content, or ash content, or heat content is missing.
• Operating Schedule – if exceeds the permitted schedule.

• Excess Process Rate – if reported annual process rate larger than the permit limit.

• Excess Sulfur, Ash – if reported sulfur/ash content is larger than the permit limit.

• Excess Heat Input

• Excess Emissions – reported annual emission larger than the permit limit allowable: equivalent tons/year.

• Exceeded Emissions Cap – reported annual emission larger than emissions cap (fac wide or multi-unit cap).
Revising an EAOR

• If Title V, and revisions affect Title V fees or are very involved, should resubmit.
• Make the revisions in EAOR, and resubmit.
• Do **not** re-import your data file. This will overwrite and null out data values that you have already entered!

*** Contact me if you have questions or problems! ***
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 may sign the AOR electronically or submit signature pages. *The AOR is not complete until it is signed.*
- Please note: In order to sign electronically, you will need a user account and PIN. You do not need to download the EAOR software to sign the AOR.
  - Information on how to sign electronically can be found on the EAOR website: [http://www.dep.state.fl.us/air/emission/eaor/default.htm](http://www.dep.state.fl.us/air/emission/eaor/default.htm)
  - Click Here to Register a New Account - Note the ‘Help’ button on this screen.
  - 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 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.

• The report can be signed electronically.
EAOR: Potential Improvements

• Small screen size
  • Requires use of a scroll bar
• Data Verifications
• Emissions Comments
• Comparisons with permit limits /thresholds/EPSAP not available
• Improving display of Emissions Comparison reports – graphed trend chart showing multiple years.
• Including automated emissions calculator tools to determine which thresholds are exceeded and require reporting.
• EAOR is not web based
  • Limitations on operating systems
• EAOR Website has information pertinent to EAOR: http://www.dep.state.fl.us/air/emission/eaor/default.htm

• The AOR and Title V Fee are due by April 1.
  • Title V facilities must submit the AOR using EAOR software (or claim technical or financial hardship by submitting Division’s pre-filled form).
  • Title V emissions fee checks must be postmarked no later than April 1.
  • Electronic banking transfer submissions must be received by DEP by April 1.
  • The Title V Emissions Fee website is here: https://floridadep.gov/air/permitting-compliance/content/title-v-fees

• EAOR Software
  • EAOR software allows you to submit your Annual Operating Report to Florida DEP.
  • The latest version of EAOR is found on the EAOR website.
  • 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://floridadep.gov/air/permitting-compliance/content/annual-operating-report
EAOR Website
http://www.dep.state.fl.us/air/emission/eaor/default.htm

Title V Annual Emissions Fee On-line Information
https://floridadep.gov/air/permitting-compliance/content/title-v-fees

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

EAOR Helpdesk
eaor@dep.state.fl.us

New webpage: How to Find Air Documents Online
https://floridadep.gov/air/air-director/content/how-find-air-documents-online
The following emissions calculators are provided for your use, however their use to estimate emissions is optional:

**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](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 SCCs added, please email them to Cindy.Phillips@dep.state.fl.us

- **Annual Air Emissions Calculators for some SCC**
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
Questions/Assistance Contacts

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

Kathleen Carr
Contact Kathleen re: registering 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.
• Cindy.Phillips@dep.state.fl.us
• 850-717-9098

Kris Lanh, Engineer
• Contact Kris with general AOR questions.
• Kris.Lanh@dep.state.fl.us
• 850-717-9094
When reporting PM, PM$_{10}$, 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 PM$_{10}$, primary PM$_{2.5}$, filterable PM, filterable PM$_{10}$, filterable PM$_{2.5}$ and condensable PM (CPM).

- PM filterable >= PM$_{10}$ filterable >= PM$_{2.5}$ filterable
- PM$_{10}$ primary >= PM$_{2.5}$ primary >= 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 PM$_{10}$ is the total of PM$_{10}$ filterable plus CPM.

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

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

- If reported, report condensable PM$_{10}$ and condensable PM$_{2.5}$ as CPM.
- PM$_{10}$ condensable = PM$_{2.5}$ condensable = CPM