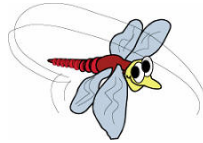

EAOR Reviewer Deskbook



Version 1.2

Includes updates through: March 27, 2012

Division of Air Resource Management



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1.1 Introduction

The EAOR Reviewer Deskbook is a compilation of information for EAOR reviewers. This deskbook has been created with the intention of continually updating it by inserting recent or additional documents under “Resources” for each section. Chapter one addresses administrative topics and provides contact lists for reviewers. Chapter two outlines the AOR process and general timeline and includes questions regarding permits and EAOR. Chapter three contains the EAOR instructions for completing 62-210.900(5), with helpful tables and FAQs inserted in “Resources” for each relevant section. Chapter four contains past AOR teleconference summaries as references.

Resources

(See following pages.)



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

December 22, 2011

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Dear DEP Air Permit Holders:

The purpose of this letter is to remind you that your Annual Operating Report (AOR), submitted either electronically or via hardcopy, for the 2011 reporting year is due by **April 1, 2012**, according to Rule 62-210.370, F.A.C. Please also remember that report year 2011 is a “hazardous air pollutants (HAPs) reporting year.” The additional requirements for reporting HAPS are specified in the AOR instructions as well as in the frequently asked questions segment of the Department’s EAOR (Electronic AOR) website at <http://www.dep.state.fl.us/air/emission/eaor>. This website also provides an array of other resources to assist you with the reporting process, including:

- a flow chart to help you to determine the pollutants that must be reported;
- instructions for how to download or request a partially pre-filled, hardcopy AOR; and
- instructions for how to download the EAOR software.

We strongly encourage you to take advantage of the benefits of the EAOR software, which is designed to make your reporting process less time consuming and more efficient by enabling you to:

- submit your report electronically via the internet;
- avoid typographical mistakes by pre-filling facility specific information from the Department’s database;
- have a side-by-side comparison of the current year data with the data from previous years;
- easily review changes made by automatically highlighting the changes;
- access “help” with one key stroke (including the definitions of each data field);
- set formulas to calculate emissions that can be re-used with future reports;
- attach supporting documents electronically;
- identify missing data via the edit checks feature;
- save your report as a .pdf file to print as a hard copy or email for peer review before submittal.

If you used the EAOR software last year (i.e., version 2010-1c), you do not need to re-install it this year because there have been no updates. You will likewise not need to obtain a new PIN number for your electronic signature if you already have an Electronic Permit Submittal and Processing System (EPSAP) or EAOR account and PIN. If you do not have an EPSAP or EAOR account and PIN, please see the instructions for obtaining one at the above-referenced EAOR website. We encourage you to do this as soon as possible because it takes approximately 4 days to process a new account and PIN depending on the mail. Your report will not be considered complete if it is not signed.

As mentioned above, one of the key benefits of the EAOR software is the ability to submit your report and any accompanying data via the internet. If you are unable to use this feature of the software, you can still use the EAOR software to prepare the report and the Department’s website to electronically sign the report, but you will need to e-mail the submittal data file to the Department at eaor@dep.state.fl.us or you can alternatively download the submittal data file to a Compact Disc and send it to the DEP headquarters office at:

**Division of Air Resource Management, MS5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400**

In addition to making your reporting more timely and efficient, the EAOR software also enables the Department to process and review your report more timely and efficiently. As such, we ask that you submit a hard copy AOR only as a last resort. In the event you must submit a hard copy, please submit to your local approved program or DEP district office at the following address:

**Department of Environmental Protection
Southeast District - Air Program
400 North Congress Avenue, Suite 200
West Palm Beach, Florida 33401**

If you have questions or need assistance, please contact us by phone at (850) 717-9000 or e-mail at eaor@dep.state.fl.us.

Thank you.

1.2 List of Acronyms

General

ARMS	Air Resource Management System
AOR	Annual Operating Report
CEMS	Continuous Emission Monitoring System
DARM	Division of Air Resource Manage
DEP	Department of Environmental Protection
EAOR	Electronic Annual Operating Report
EP	Emissions Point
EU	Emissions Unit
GFC	Government Facility Code
RO	Responsible Official
SAF	Seasonal Adjustment Factor
SCC	Source Classification Code
SIC	Standard Industrial Classification
VE	Visible Emissions

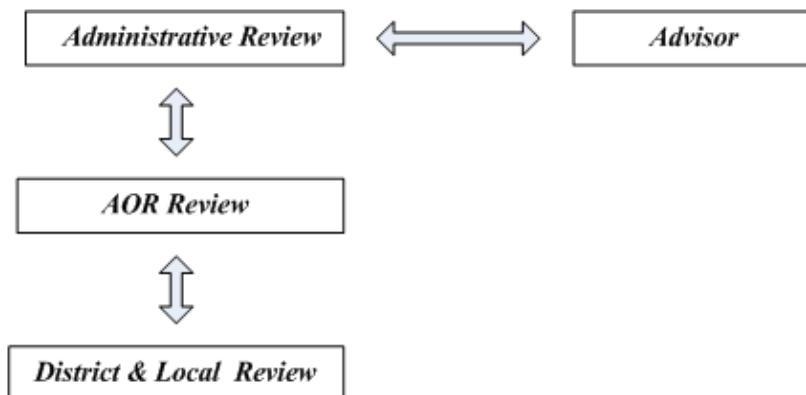
Permit Types

AC	Air Construction Permit
AF	Air Federally Enforceable State Operating Permit
AO	Air Operating Permit
AV	Air Title V Operating Permit

District and Local Offices

CD	Central District
CDOR	Central District-Orange County
NED	Northeast District
NEDV	Northeast District-Duval County
NWD	Northwest District
SD	South District
SEBR	Southeast District-Broward County
SED	Southeast District
SEDA	Southeast District-Dade County
SEPB	Southeast District-Palm Beach County
SWD	Southwest District
SWHI	Southwest District-Hillsborough County
SWPN	Southwest District-Pinellas County
SWSA	Southwest District-Sarasota County

1.3 Reviewer Roles



Advisor

- Assists with AOR rule and statutory requirements
- Provides guidance to AOR reviewers and administrative reviewer
- Assists with calculation correctness

Administrative Reviewer

- Serves as project lead for AOR review
- Manages and assists all AOR reviewers
- Maintains status report on all facilities
- Coordinates with district and local air programs on all facilities
- Assists and resolves errors prior to uploading EAOR data into ARMS database

AOR Reviewers

- Reviews data for quality assurance and quality correctness (QA/QC)
- Logs significant data differences in the upload spreadsheet
- Researches plausible errors and data differences
- Communicates to administrator reviewer to resolve errors
- Communicates with district and local air programs when needed
- Uploads data into ARMS once errors have been resolved
- Performs post-upload QA/QC
- Maintains status on individual facilities

Resources

(See following pages).

1.3: 2011 AOR Assignments

Office Assignments for the 2011 AOR Review

Reviewer	Office
Cadedra (71)	ADMINISTRATIVE REVIEW, SWPN(62) , SWSA (9)
Cindy (142)	SED (50), SEDA (92)
Dianne (89)	NED (89)
Kelly (202)	CDOR (67) , NEDV (68), SEBR(67)
Terri (51)	SD (51)
Tiffany (266)	NWD(100), SEPB(40) , SWHI(126)
Will (316)	CD (133) , SWD(183)

***District or Local Air Program would like to review facility data first.**

Will is also responsible for processing signature pages.

Office Assignments for the 2010 AOR Review

Reviewer	Office
Cadedra (66)	ADMINISTRATIVE REVIEW, SWPN(66)
Kelly (230)	CDOR(70) , SEDA(93), NEDV(67)
Shenita (247)	SWHI(132) , SED(48), SEBR(67)
Terri (91)	NED(91)
Tiffany (290)	CD(135) , NWD(104), SD(51)
Will (242)	SEP(45) , SWD(186), SWSA(11)

***District or Local Air Program would like to review facility data first.**

Will is also responsible for processing signature pages.

OFFICE ASSIGNMENTS FOR THE 2009 AOR REVIEW

REVIEWER	OFFICE
CAEDRA	ADMINISTRATIVE REVIEW + SWPN (67)
KRIS	NEDV(70), SWHI (133)
TIFFANY	CD (145)
LISA	CDOR (70), SEDA (96)
WILL	SD (55), SEPB (46), SWD (189)
SHENITA	NWD (102), SED (44), SWSA (11), SEBR (66)
KELLY	NED (86)

*DISTRICT OR LOCAL AIR PROGRAM WOULD LIKE TO REVIEW FACILITY DATA FIRST.

WILL IS ALSO RESPONSIBLE FOR PROCESSING SIGNATURE PAGES.

1.4 Getting Started

AORs are a year-round process. It is important that each party involved does its part in order to make the review process a success. Here are some pointers to get you started in the right direction:

Have your IT staff to install the most recent version of the EAOR Reviewer software onto your computer. The software and instructions can be downloaded found here:

http://appprod.dep.state.fl.us/arms_reports/eaor/.

First-time users should be provided training, whether by an experienced staff member in their office or by Tallahassee staff.

Attend monthly AOR teleconferences to stay aware of the latest issues in regards to AORs, EAOR, and other relative subject matter. Issues or concerns that district and local program staff have are addressed on these calls as well. AOR monthly teleconferences are hosted by Tallahassee and are held the first Tuesday of each month. An agenda (or cancellation notice) normally is e-mailed at least one day prior to the day of the call. A summary of the discussion of the call is normally e-mailed no later than one week after the call.

If you have not been receiving e-mail notices, please email Cadedra.Hodge@dep.state.fl.us to ensure that you are on the e-mail list.

Key milestones to keep in mind in regards to the AOR data:

Data Cleaning

Data Extraction

AOR Letters

AOR Submittal Period

EAOR Training (Facility and Reviewer versions)

AOR Review and Upload Period

AOR Edit Checks

Submitting Florida's Point Source Emissions Inventory to EPA

Please refer to the AOR Calendar, Section 2.1, for details on each of these tasks (including time periods and deadlines). Please try and keep these tasks and dates in mind as you plan your workload throughout the year.

If you have any questions or concerns, please feel free to contact Cadedra Hodge at (850) 717-9014 or Cadedra.Hodge@dep.state.fl.us.

Resources

(See following pages).

1.5 Contacts

You can also send any questions to EAOR@DEP.STATE.FL.US

Resources

(See following pages.)

DARM Contacts

Last updated 3/23/2012

Cadedra Hodge, Administrative Reviewer

Cadedra.Hodge@dep.state.fl.us

(850) 717-9014

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(850) 717-9102

AOR Reviewers

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Cindy Phillips, P.E.

Cindy.Phillips@dep.state.fl.us

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Will Sexton

Will.Sexton@dep.state.fl.us

(850) 717-9014

Dianne Spingler

Dianne.Spingler@dep.state.fl.us

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Kelly Stevens

Kelly.Stevens@dep.state.fl.us

(850) 717-9017

District Contacts

Last updated 3/23/2012

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407-893-3333

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Wanda.Parker@dep.state.fl.us
407-893-3991

Northwest District (NWD)

Carol Melton
carol.melton@dep.state.fl.us
850-595-0616

Christopher Stoll
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Southwest District (SWD)

Nedin Bahtic
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813-632-7600 ext. 126

Northeast District (NED)

Stuart Bartlett
stuart.bartlett@dep.state.fl.us
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Vincent Clark
Vincent.Clark@dep.state.fl.us
904-256-1559

Southeast District (SED)

Michelle Robinson-Austin
Michelle.RobinsonAustin@dep.state.fl.us
561-681-6643

South District (SD)

Sherrill Culliver
Sherrill.Culliver@dep.state.fl.us
239-332-6975 ext. 142

Supervisor:
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239-332-6975 ext. 134

Local Contacts

Last updated 3/23/2012

Orange County (CDOR)

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407-836-1522

Bill Rhodes
William.Rhodes@ocfl.net
407-836-1525

Jodi Dittell
Jodi.Dittell@ocfl.net
407-836-1419

Broward County (SEBR)

Paul Shelton
pshelton@broward.org
954-519-1444

Cynthia Fernandez
cfernandez@broward.org
954-519-1220

Clifton Bittle
cbittle@broward.org
954-519-1208

Josie Cisneros
jcisneros@broward.org
954-519-1215

Hillsborough County (SWHI)

Jason Waters
watersj@epchc.org
813-627-2600 ext. 1269

Heidi Swanson
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813-627-2600 ext. 1279

Duval County (NEDV)

Tom Griffin
Griffin@coj.net
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Lori Tilley
Tilley@coj.net
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Pinellas County (SWPN)

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Shea Jackson
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727-464-4562

Jeffrey Morris
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Eric Fehrman
efehrman@pinellascounty.org

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Ray Gordon
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305-372-6925

Palm Beach County (SEPB)

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561-837-5978

Paul Kalamaras
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561-837-5946

Sarasota County (SWSA)

Susan Cameron
scameron@scgov.net
941-861-6237

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2.1 AOR Calendar

AOR Calendar for District and Local Offices

Time Period	Task
November/December	Data Cleaning We are preparing the data for the upcoming year (making sure that all of the basic data is entered in ARMS for those facilities required to submit an upcoming AOR). Tallahassee emails the districts and local staff the data cleaning reports. The district and local staff should work with their permit staff to make sure the data is entered in ARMS. Tallahassee also works with permit staff here to make sure the data is entered for permits issued by Tallahassee. Deadline: The first round of reports will be emailed to you by November 1st; please complete by December 1st. Tallahassee will run additional reports at the beginning of December to make sure nothing was missed. Data cleaning must be complete prior to data extraction. Data Extraction Tallahassee extracts the data for the upcoming reporting year from ARMS so that it is available for the facilities to download at the beginning of the year Deadline: December 31st
December	AOR Letters Tallahassee mails a letter to all facilities that are required to submit an AOR for the upcoming year. This letter contains pertinent information about the AOR deadline, accessing EAOR software, trainings, and other information, etc. Deadline: December 31st
January – March	AOR Submittal Period Facilities are submitting their AORs. Most facilities submit electronically; however, some facilities still submit using the hardcopy AOR form. Please make sure those facilities use the partially pre-filled form. Tallahassee will forward all hardcopy AORs received here to the districts and locals. Deadline: April 1st (deadline for facilities to submit AORs) EAOR Training Tallahassee normally provides EAOR Facility training to industry (at a central location or via webinar). Additionally, Tallahassee normally provides EAOR Reviewer training to district and local staff during this time period, if needed. EAOR Facility version training is usually given by February 28th; EAOR Reviewer version training is provided on an as needed basis.
January – June	AOR Review and Upload Period Tallahassee and district and local staff are reviewing and uploading the AOR data into ARMS. District and local staff have the option to review the data prior to Tallahassee’s review but they must notify Tallahassee and coordinate a schedule by April 1st. Tallahassee also forwards any problems/issues found with the data reported by facilities to the districts and locals. The districts and locals are expected to resolve these issues in a timely manner. Deadline: June 1st (deadline to process hardcopy AORs into EAOR); June 30th (deadline to review and upload the AOR data)

July - September	AOR Edit Checks The district and locals are to use the ARMS reports to perform AOR edit checks. Staff should work with their permitting and compliance staff to resolve “issues.” Deadline: September 30th
June - December	Submit Florida’s Point Source Inventory to EPA’s EIS Tallahassee is preparing the data for submittal to EPA’s EIS. (For example, facilities submit their 2009 AOR data to us by April 1, 2010. Tallahassee is preparing the 2009 data for submission to EPA by December 31, 2010). Please keep in mind that we often encounter missing or incomplete data (i.e. stack parameters, coordinates, control efficiencies, etc.) during this process and will need the help of the districts and locals to resolve. Deadline: December 31st

AOR Calendar for DARM

Example: 2008

Every month

Monthly teleconference with district and local offices on the first Tuesday, at 10 am. Send meeting summary in one week after each meeting.

November

- By 11/15, send out ARMS data cleaning reports to the district/local offices*
 - List of facilities that are required to submit 2008 AOR
 - Facilities should be required for AOR but AOR field is N
 - Facilities that are missing EUs
 - EUs that are missing SCCs
 - EUs that are missing pollutants
- Data cleanup on permits issued by BAR
- Finish documentation updates of EAOR Facility
- Finish testing EAOR Facility, including OEX and Batch Report

December

- Work with district/local offices on data cleanup
- Data cleanup on permits issued by BAR
- Mailing address cleanup (each facility that is required to submit AOR must have one authorized representative)
- At the end of December, prepare data files for the 2008 AOR after the data cleanup is complete* (save data on o drive and server)
- Prepare pre-filled hardcopy AOR for facilities did not submit EAOR for previous year* (save pdf files on o drive and server)
- Sent out 2008 AOR letter to all facilities that are required to submit*
 - List of materials (information, data, program, workshop announcement) that are posted on the web
 - New requirements for reporting year 2008
 - April 1 deadline (2008 AOR is due 5/1/2009) – Many permits have the March 1 deadline in the permit conditions.
 - Mailing address for first 2 pages if using EAOR - DARM
 - Mailing address for using only paper form – district/local offices
- Assist contractor to prepare updates on EAOR website
 - New requirements from the 2008 rulemaking
 - Make sure code tables are up to date in ARMS
 - New version of EAOR Facility
 - Summary of changes of EAOR program
 - New data files on the server
 - New installation instructions

- New user manual
 - New files for download pre-filled hardcopy form on the server
 - Industry workshop notification*
8. Ask contractor to check EAOR database space
 9. Finish documentation updates of EAOR Reviewer
 10. Finish testing EAOR Reviewer

December 31

Deadline for submitting previous year AOR data to EPA.

January

1. Move EAOR Facility updates to production **internet** on 1/1/2009
2. Move EAOR Reviewer updates to **intranet** 1/1/2009
 - New version of EAOR Reviewer
 - New installation instructions
 - New user manual
3. Hold industry workshop(s) around the end of January (with the new due date of April 1, we should re-consider the timing of the workshops)
4. Summarize AOR workshop surveys and report to management
5. Process AOR mails (EAOR data on disks or received by email, cover letters, signature pages, hardcopy supporting documents)
6. Start reviewing the 2008 AOR data
7. Monitor EAOR surveys

February to June

1. Continue reviewing the 2008 AOR data – finish by 6/30/2009
 - Review data
 - Upload data into ARMS
 - Alert district/local office on AORs with problems
2. Continue to process AOR mails
3. Send status report to district/local office at least once a month
4. Monitor re-submissions via web and email
5. Monitor EAOR surveys
6. Summarize EAOR surveys and report to management after most of AORs are received - usually a month or so after the deadline
7. Conduct EAOR Reviewer training for district/local offices if necessary

April 1

Deadline for AOR submittal, except for **2008 AOR, it is 5/1/2009**. There will be a lot of EAOR submittals and AOR mails around the deadline.

June 30

Deadline for uploading all 2008 data in EAOR Reviewer to ARMS, including paper AORs entered by district and local offices. This is also the deadline for paper AOR data entry if the district/local offices choose to enter the data directly in ARMS.

June – September

1. Help district and local offices with edit checks*
2. Confirm AOR review completion by district and local offices*
3. Monitor re-submissions via web and email
4. Monitor EAOR surveys
5. QA inventory data for permits issued by BAR*
6. Test changes made to EAOR program, Facility and Reviewer version

September 30

Deadline for completing the AOR review by district/local offices (all edit checks and compliance determination, date done for all AOR activity).

October

1. Continue QA inventory data for permits issued by BAR

- 2. Continue testing changes made to EAOR program
- 3. Update EAOR documentations
- 4. Continue QA inventory data for permits issued by BAR*

* -- Details documented separately

Resources

(See following pages).

2.2 EAOR Data Upload to ARMS

- 1) Please run status report to get a list of facilities. Every day, you should run the status report to look for any AOR that has status “Ready for Review.” Please work on these first before moving on to the others.
- 2) Enter review date on the first EU when you start reviewing the AOR for a facility if the district/local office has not reviewed or the review date is blank.
- 3) Check the following. Log changes or outstanding differences in o:\opapm\yi\eaor\2011upload.xlsx. Do not upload to ARMS until it is approved. However, **please make your determination and enter your conclusion in the comment column.** Changes made by the district/local offices and multiple submissions are also logged in the comment.
 - A. Facility status
 - B. County
 - C. Government facility code
 - D. SIC
 - E. Ownership change (facility section C) and company name or site name change
 - F. EU status
 - G. EU description
 - H. New EU (Is it already in ARMS? Is the classification correct?)
 - I. Emission point type
 - J. Control equipment
 - K. Invalid SCC/pollutant
 - L. New SCC
 - M. New pollutants: log it but go ahead with the upload. **Always use preferred pollutant ID.**
 - N. Process rate consistent with 2010?
 - O. Look at comments in EU section D and section E, and SCC comment in ARMS; if necessary, add comment in ARMS for the correct SCC. In general, this is only needed when a SCC description is not specific enough.
 - P. If process rate is blank and the comment say confidential, and there are emission data, enter a bogus rate before the upload (end with .99) and make sure that the confidential information is submitted separately. Make sure the number is easily recognized as bogus.
 - Q. Emissions consistent with 2010? Look at emission calculation and see if the numbers are consistent. Are changes in emissions consistent with changes in process rates? For acid rain and CAIR units, you can check acid rain and CAIR data to confirm the changes.
 - R. Review attachments (i.e. cover letters, calculations, etc.) in EAOR for consistency. Please keep in mind that there is now no need to look on O-drive for attachments; all attachments have been attached in EAOR. On the cover letter, if the facility pointed out any mistakes in previous year’s data or any other data that they cannot change, record it in 2011upload.xls.

- S. Look for emissions that are **double entered** (using the report)
- T. If a facility reported PM, but not PM10, enter the same number in PM10 when it is appropriate and log the EU IDs in PM10 column in 2011upload.xlsx.
- U. **Review Emission Report by Facility (compare emissions of 2011 with 2010)**
- V. If HAP emissions were reported in 2010, but not in 2011, log it and mark it ready for admin review. (2011 is a HAPs report year so facility should report emissions associated with individual HAPs).
- W. Emission Method Code 3A – Starting 2007, facilities are required to use at least 5-year average of test results. If they still used only one test that occurred during the reporting year, **or** they multiplied lb/hr from the test by total operating hours to get annual emissions, record in column labeled 3A on the 2011upload spreadsheet (look at Emissions Unit Comment, SCC Comment, Emission Comment, Calculation Worksheet, and Attachments). Log it but go ahead with upload.
- X. Startup/shutdown emissions (S/S emissions) – Note if startup/shutdown emissions are included in annual emissions (Facility will reference startup/shutdown emissions - look at Emissions Unit Comment, SCC Comment, Emission Comment, Calculation Worksheet, and Attachments). If S/S emissions are included, mark the S/S box in EAOR. Log it but go ahead with upload.

Note: Items A through J can be checked using the **Facility Difference** report.

- 4) Verify facility data.
- 5) Mark Ready for ARMS Upload or Ready for Administrator Review if it needs to be reviewed by Cadabra.
- 6) When you change the status to Ready for ARMS Upload, there is the possibility that the ARMS Comparison Report may appear. If there are no changes in the EU status or Facility status in EAOR, then proceed with the upload and do not manually change the status in ARMS the next day. However, if there are changes in EAOR, they should have been addressed already. If the changes have not been addressed already, please do so on the 2011upload.xlsx spreadsheet and mark the facility Ready for Admin Review.

After upload is complete (next day),

- 7) **Compare the emissions** at the facility level in ARMS and in EAOR. Since the sort order is different in ARMS than EAOR, and the emission report does not keep the same number of decimal places, the ad hoc report (Facility Pollutant) is the best report to use.
- 8) Check manual update reports. Update ARMS data manually if necessary.

Manually Update ARMS Reports

- 1. Did the facility make any changes to the data in EAOR? If no, no need to do anything.
- 2. Did the facility make any changes to the data in EAOR? If yes, look at the data in ARMS. If the data in ARMS already have the changes that were made in EAOR, no need to do anything.

3. Did the facility make any changes to the data in EAOR? If yes, look at the data in ARMS. If the data in ARMS are different from the data in EAOR, determine whether the changes in EAOR should be applied in ARMS with Cadedra.
4. If there is more than one authorized rep, upload program will not update the data. You need to update the data manually. Same is true for facility contact. Discuss the necessary update with Cadedra.
5. Ignore changes to permit numbers.
6. If a facility is uploaded twice, ignore the messages **on the second upload**.

Resources

(See following pages).

2.3 AOR Reviewer Checklist

1. When you pull your status report each day, this should be the priority of your reviews:
 - a. Ready for Review (Administrative Reviewer or D/L)
 - b. Verified Submissions (for offices who are not reviewing their data first)
2. If you have more than one office to review, you should spread your reviews across the offices. Please do not focus on one office at a time.
3. If a facility has more than one submission, please compare multiple submissions to see if there are differences and note your findings in your comments.
4. If a facility has been reviewed by the D/L first, please compare to see what changes they made, if any, and note your findings in your comments. If it is a paper submission, please indicate that the submission is a paper submission entered by D/L.
5. If there is an attachment and/or emission calculations in the emission calculation field (entered manually by user versus the ones that are generated when they use the calculation worksheet) or emissions comment field, please compare to what's reported and indicate whether or not they are consistent w/what's reported. If not consistent, be specific when you note the discrepancies in your comments. Sometimes when there are a lot of attachments, it is hard for me to pinpoint what you are talking about.
6. If you make changes in EAOR (add PM10 or calculate summer season rate/emissions) enter a comment in EAOR to indicate that DARM changed or added something.
7. When you provide your conclusions, research items that you can easily look into it (i.e. the changes in the EU description, EU/facility status, etc.) and tell me your findings in your comments. You can check ARMS and the permit. The veteran reviewers are a little bit more knowledgeable but the new reviewers have undergone ARMS Oracle training and should be a little familiar with the system. I think with practice (i.e. such as using the system to verify changes to EAORs), you will become even more familiar.

Resources

(See following pages.)

2.3 FAQ: AOR Review Status

From: Parmer, Cadedra

Sent: Wednesday, May 27, 2009 4:04 PM

To: Parmer, Cadedra; Brice, Shenita N.; Holway, Andy; Lanh, Kris; Lanh, Tiffany; Sexton, Will; Stevens, Kelly

Cc: DeAngelo, Gregory; Rogers, Tom; Zhu, Yi

Subject: AOR Review Status

Here is the AOR Review status as of May 26, 2009. Please keep in mind that our target date to complete the review and upload of the 2008 data is June 30, 2009. I added a new column showing the number of facilities that must be uploaded each day in order to finish on June 30th. I used 24 working days, assuming you do not take any time off. However, we want to reach this goal without sacrificing the quality of work. So please do not rush through your reviews and we end up having to correct and re-upload data. I understand that many of us have a number of work assignments that we are involved in; however, please try to find time in your schedules to commit to the review and upload of facilities. I am still working on catching up on my "Ready for Admin Review" list and I should be caught up by the end of this week.

See me if you have any questions. Also, I am working from home in the afternoons and checking my email frequently, so please feel free to email me any questions you may have. Thanks.

Staff	Assigned	Reviewed by DARM	Reviewed by D/L	Not Reviewed	% Not Reviewed	Uploaded	% Uploaded	Upload/Day
Andy	133	23	59	54	41%	11	8%	6
Cadedra	79	18	59	9	11%	12	15%	3
Kelly	75	30	0	45	60%	25	33%	3
Kris	279	126	54	129	46%	92	33%	8
Shenita	108	88	42	20	19%	36	33%	3
Tiffany	218	97	120	72	33%	67	31%	7
Will	148	121	5	22	15%	58	39%	4
Total	1040	503	339	351	34%	301	29%	

Office	Total	Paper	Reviewed by DARM	Reviewed by D/L	Not Reviewed	Uploaded	% Uploaded
CD	128	2	52	85	43	37	29%
CDOR	68	9	4	46	19	1	1%
NED	75		30		45	25	33%
NEDV	65		39	26	26	28	43%
NWD	45	1	36	11	2	25	56%
NWDP	30	2	20	5	5	17	57%
NWDT	23	1	18	3	2	12	52%
SD	48		27	2	21	22	46%
SEBR	55	1	35	35	20	2	4%
SED	43	1	43	1		28	65%
SEDA	65	4	19	13	35	10	15%
SEPB	42		18	33	8	8	19%
SWD	159	6	132	5	22	65	41%
SWHI	116	6	13	9	94	10	9%
SWPN	68	5	7	59	9	5	7%

SWSA	10	2	10	6		6	60%
Total	1040	40	503	339	351	301	29%

Paper = accounts for only paper submissions that have been processed in EAOR

Reviewed by DARM = reviewed by Inventory group in Tallahassee (many with prior review by D/L)

Reviewed by D/L = reviewed by D/L, subsequent review by DARM unnecessary (if uploaded) or pending (if not uploaded)

Not Reviewed = not reviewed yet by D/L or DARM

Cadedra Parmer Hodge
Environmental Specialist
Florida Department of Environmental Protection
Division of Air Resource Management
Phone: (850) 921-9590

2.3 FAQ: Change of AOR Deadline in Permit

From: DeAngelo, Gregory
Sent: Monday, February 22, 2010 9:41 AM
To: Parmer, Cadedra
Cc: DeAngelo, Gregory
Subject: RE: Change of AOR reporting date

Yes, the "legal document" they can send the facility to change the date is a "permit." What does he mean the facility is requesting the change to the reporting date? If facility just called and asked them to change it, then Manny should ask them to submit an application for permit modification. BAR permitting policy on this issue was to NOT reopen the Title V permits just because of this issue, but to instead work the new due date into the permit upon renewal or if some other revision needed to be made. If facility really wants the new date now, they should submit a permit application to get their permit changed.

You should probably also resend Cindy's email about the SOC to Manny.

~ Greg D.

From: Parmer, Cadedra
Sent: Monday, February 22, 2010 8:26 AM
To: DeAngelo, Gregory
Subject: FW: Change of AOR reporting date

Their permit would have to be reopened, wouldn't it? And I guess we would also want to remind Manny of the SOC guidance document. Please advise on how to proceed.

Thanks,

Cadedra

From: Delosantos, Manuel
Sent: Monday, February 22, 2010 8:15 AM
To: Parmer, Cadedra
Subject: Change of AOR reporting date

Cadedra,

A facility is requesting a change of the reporting date from March 1st to the new April 1st date in the rule. The air permit for the facility situate the March 1st as the due date. Is there any legal document that we can send the facility changing the date to April 1st?

Thanks,
Manny

Manuel P. Delosantos
Engineering Specialist IV
DEP Southeast District
Air Program

2.3 FAQ: Deadline to Submit

From: Gee, Shau D PWR [<mailto:Shau.Gee@pwr.utc.com>]

Sent: Monday, February 22, 2010 12:02 AM

To: Parmer, Cadedra

Subject: RE: EAOR Training - March 3, 2010

Cadedra,

because our Title V permit has always carried the March 1 date for AOR submittal, that is what we have been using as our deadline. Otherwise, we could not certify compliance for this permit condition when the Title V compliance statement is due on March 1.

We will try and change the permit date to April 1 during the next permit renewal.

thanks,

Best regards,

Dean

From: Parmer, Cadedra [<mailto:Cadedra.Parmer@dep.state.fl.us>]

Sent: Saturday, February 20, 2010 10:00 AM

To: Gee, Shau D PWR

Subject: RE: EAOR Training - March 3, 2010

Yes, Dean, this date is correct. The deadline to submit 2009 AORs is April 1, 2010.

Thanks,

Cadedra

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Gee, Shau D PWR [Shau.Gee@pwr.utc.com]

Sent: Friday, February 19, 2010 4:10 PM

To: Parmer, Cadedra

Subject: RE: EAOR Training - March 3, 2010

Cadedra,

is this date correct? I thought reports were due on March 1?

thanks,

Best regards,

Dean

2.3 FAQ: AOR Deadline and Annual Statement of Compliance

From: Phillips, Cindy

Sent: Tuesday, January 19, 2010 12:51 PM

To: Ajhar, Rebecca; Alsop, Penny; Anderson, Lennon; Arias, Raquel; Banks, Richard; Barata, Raymond; 'Berkulis, Teresa'; 'Bittle, Cliff'; 'Blount, Marvin'; Bradburn, Rick; 'Brown, Dana'; 'Bundy, Ilka'; Burkholder, James; 'Cameron, Susan'; 'Campbell, Jerry'; Castellano, Marlane; Claridge, Kevin; Clark, Vincent; Comer, Patricia; Cooley, Sally; 'Crabtree, Sharon'; Culliver, Sherrill; 'Delgado, Robert'; Dibble, Dickson; 'Dittell, Jodi'; 'Dizek, Jeff'; Duke, Robert; Falandysz, Cynthia; Forrest, William; Fox, Howard; 'Frases, Jorge'; 'Froberg, William'; George, Larry; Gibson, Victoria; 'Girton, Mike'; 'Gordon, Ray'; 'Helmke, Michael'; Henry, Danielle D.; 'Heppner, Jane'; 'Hessling, Pete'; 'Hickey, John'; Hoefert, Lee; Holtom, Jonathan; 'Johnson, Aaron'; 'Jordahl, Claire'; Kahn, Joseph; Kirts, Christopher; Koerner, Jeff; Kuberski, Garry; Lewis, Wayne; Linero, Alvaro; 'Liu, Pwu-Sheng'; Long, Terri; Lurix, Joe; 'March, Marta'; 'Martin, Faith'; 'Martin, Wayne'; 'McCann, Matt'; Melton, Carol; 'Miller, Randy'; Mitchell, Erica; Moncrief, Alik; Moore, Ronni; Morgan, Larry; 'Muthiah, Mallika'; Nasca, Mara; Neginsky, Raisa; Nevins, Barbara; 'Ortega, Alex'; Parker, Wanda; Pell, Leigh; Pennington, Jim; Pichard, Errin; Qureshi, Shabbir A.; Rainey, Allen; 'Richards, Walt'; 'Robbins, Gary'; 'Rodriguez, Alan'; 'Russell, Kathryn'; 'Sanford, Reggie'; Satyal, Ajaya; Schneider, Sheila; 'Shelton, Paul'; Shine, Caroline; 'Soptei, Bob'; Spingler, Dianne; Stevens, Chad R.; Stewart, Robert J.; Stoll, Christopher; 'Stormer, Jim'; 'Strother, Kay'; Sumner, Mark C.; 'Tallam, Laxmana'; Tampas, Patricia; 'Telemeco-Anders, Debbie'; Thornton, Douglas; 'Tittle, Tom'; Tober, Dennis; 'Tutt, Wayne'; Veazey, Sandra; Vielhauer, Trina; Vincent, Jeremy; Walker, Elizabeth (AIR); Waltrip, Jennifer; 'Waters, Jason'; White, Tracy A.; 'Wong,Patrick'; Hughes, John

Subject: Title V Annual Statement of Compliance (ASOC) - Annual Operating Report (AOR) Deadline in Rule vs. Deadline in Permit

Because many Title V permits were not updated to revise the 2008 AOR submittal deadline from March 1 to May 1, 2009, any facility that opted to follow the new rule, instead of their permit condition(s), and submit their AOR by May 1 but after March 1, 2009 may be wondering, and therefore asking you, how to classify this allowed-by-rule-but-not-by-permit action on their Annual Statement of Compliance for 2009.

We had hoped to revise the ASOC form this past year to accommodate this type of scenario but, due to other rulemaking priorities, were unable to do so. Some possible options are, but are not limited to:

Option 1:

The most straightforward approach would be for the Responsible Official (RO) to check "C" on the form and attach a page which identifies the condition(s) in the permit which state that the AOR deadline was March 1 and explain that the new rule supersedes the old permit condition(s) and therefore the facility is technically not out of compliance because the AOR was submitted by May 1st as now allowed by rule.

___ C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report

Pros: Brief and most conservative.

Cons: If this is the only reason an RO would be checking “C”, the RO would probably prefer not to have that stigma.

Option 2:

If the facility is in compliance with all other terms and conditions of the Title V permit and there are no deviations, i.e., no other reason to check “C” or “B”, the RO could check “A”. It would be a good idea to also attach a page which identifies the condition(s) in the permit which state that the AOR deadline was March 1 and explain that the new rule supersedes the old permit condition(s) and therefore the facility is technically not out of compliance because the AOR was submitted by May 1st as now allowed by rule.

___ A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

Pros: Brief and no stigma attached.

Cons: Though we understand the problem, and are not taking enforcement against a facility complying with the less stringent rule, the ASOC also has to be sent to EPA, and we’re not sure that they would agree that “A” was the right choice.

Option 3:

The way that our rules are written, our ASOC form is actually the “in lieu of” optional way of reporting compliance. It is not necessary to actually use the form. The RO has the option of making a Statement of Compliance per Rule 62-213.440(3), F.A.C. (See below.)

Pros: Don’t have to use a form that doesn’t have an option that fits the scenario.

Cons: More paperwork required. I’m sure we would accept an electronic submittal but not sure EPA would.

The RO could submit a copy of the TV permit and explain in the cover letter that the new rule supersedes the old permit condition(s) and therefore the facility is technically not out of compliance because the AOR was submitted by May 1st as now allowed by rule.

Rule 62-213.440, F.A.C.

(3) Statement of Compliance.

(a) For each applicable requirement, the permit shall contain:

1. A provision for assessing or monitoring compliance for each unit within the source;
2. A requirement that the source submit a Statement of Compliance with all terms and conditions of the permit that includes all the provisions of 40 CFR 70.6(c)(5)(iii), incorporated by reference at Rule 62-204.800, F.A.C. Such statements shall be accompanied by certification in accordance with subsection 62-213.420(4), F.A.C., for Title V requirements and with Rule 62-214.350, F.A.C., for Acid Rain requirements, with Rule 62-296.470, F.A.C., for CAIR Program requirements, and with Rule 62-296.480, F.A.C. for Hg Budget Trading Program requirements. Such statement shall be submitted (postmarked) to the Department and EPA:
 - a. Annually, within 60 days after the end of each calendar year during which the Title V permit was effective, or more frequently if specified by subsection 62-213.440(2), F.A.C., or by any other applicable requirement; and
 - b. Within 60 days after submittal of a written agreement for transfer of responsibility as required pursuant to 40 CFR 70.7(d)(1)(iv), adopted and incorporated by reference at Rule 62-204.800, F.A.C., or within 60 days after permanent shutdown of a facility permitted under this chapter; provided that, in either such case, the reporting period shall be the portion of the calendar year the permit was effective up to the date of transfer of responsibility or permanent facility shutdown, as applicable;
3. In lieu of requiring a responsible official to individually identify all applicable requirements and specify times of compliance with, noncompliance with, and deviation from each, a provision that a responsible official may use DEP Form No. 62-213.900(7) as such statement of compliance so long as the responsible official specifically identifies all reportable deviations from and all instances of non-compliance with any applicable requirements and includes all information required by the federal regulation relating to each reportable deviation and instance of non-compliance.

(b) For purposes of the Statement of Compliance required at paragraph 62-213.440(3)(a), F.A.C., a responsible official may treat compliance with all other applicable requirements as a surrogate for compliance with subsection 62-296.320(2), F.A.C., Objectionable Odor Prohibited.

There may be other options! Please keep in mind that this problem may go on for a few more years until all Title V permits are reopened for revision or renewal and the AOR reporting deadline is revised to reflect the new rule. Though the AOR reporting deadline for the 2008 AOR was May 1, 2009, the reporting deadline for the 2009 AOR (and future AORs) will be April 1st.

If you have any questions, please let me know.

Thanks,

Cindy Phillips, P.E.
C&E Program Administrator
FDEP Bureau of Air Regulation
(850) 921-9534

2.3 FAQ: Permit Timing and AOR

From: Parmer, Cadedra
Sent: Tuesday, March 30, 2010 9:30 AM
To: Knight, Nancy
Subject: RE: AOR Question

Nancy,

Here are the options for your first question:

- a) I could extract the data again from ARMS (removing this EU); however, if the facility has began data entry on the their data, they will lose it.
- b) The facility could go ahead and report the data (they will have to report it anyways on the 2010 AOR); or
- c) The facility can it explain it but they will need to pass the edit checks which means they may end up having to enter fake data.

As far as the partially filled AOR, this data is extracted out of ARMS at the end of the year and placed on our server so it wouldn't contain any of the ARMS updates after the date we extract the data.

From: Knight, Nancy
Sent: Thursday, March 25, 2010 1:03 PM
To: Parmer, Cadedra
Subject: AOR Question

Cadedra

We had a question come up this morning for a particular Title V facility. They were operating a wood grinder that was not in their Title V permit. They submitted an application for a permit last year and this wood grinder is to become an unregulated EU. The permit engineer added the EU in ARMS even though the permit had not been issued yet (they way we always do it). The permit still has not been issued but the permittee is seeing the EU on his EAOR and wondered if he had to report the emissions even though the permit has not been issued. In this case the grinder was operating in 2009, it just wasn't permitted.

The question is, could he just explain this in the comment section for this EU and not report any emissions? Another question is that when someone logs onto the web site and downloads a partially filled out EAOR does the program know not to put anything on the form that was added to the data base after December 31?

Thanks for your help

Nancy

2.3 FAQ: Permit Limits and AOR

From: Zhu, Yi
Sent: Tuesday, April 27, 2010 1:08 PM
To: DeAngelo, Gregory; Parmer, Cadedra
Subject: RE: Issues for Tuesday's teleconference

My opinion:

- 1) I agree. I think the same should apply to facilities that switched to GP during the reporting year.
- 2) I would not recommend entering, in ARMS, any limit that is not in the permit. We have other reports people could use to check this (e.g., ad hoc report – Facility Pollutant).
- 3) Always enter the numbers that are in the permit.

Yi

From: DeAngelo, Gregory
Sent: Tuesday, April 27, 2010 11:02 AM
To: Parmer, Cadedra
Cc: Zhu, Yi; DeAngelo, Gregory
Subject: Issues for Tuesday's teleconference

Hey Cadedra, I've got some issues for the teleconference (assuming we're doing one, but we can certainly put it off if that works better).

- 1) A non-Title V, non-SM facility gets a permit modification in calendar year 2009, and the modification removes the requirement to submit an AOR. Do they need to submit an AOR for the period of time in 2009 from Jan 1 until the permit modification was final? I think NO, because there is no longer any requirement to submit an AOR at all. (This is different from shutting down during the year but maintaining your permit and your permit condition requiring an AOR submittal.)
- 2) A district/local is entering a new true minor facility into ARMS. This facility has no emission limits. Should the district/local put 100 TPY limits into ARMS so that in case the facility emits at 100 TPY levels, it will be caught by the AOR edit checks and flagged for follow-up to see if the facility should be a Title V facility? (It's kind of a trick question, because to be a TRUE minor facility, your PTE must be below 100 TPY, so you should never have actual emissions over 100 TPY. But, then again, PTE typically assumes 8760 at steady state operation and does not account for startup and shutdown emissions, which theoretically could make actual emissions greater than PTE emissions.)
- 3) Same question as 2, but for a permit that does have limits. They may have a PTE of 3 tons of benzene, for example, but the permit establishes a limit of 10 tons of benzene.
- 4) I'm assuming you're planning on a status update on district/local percent complete for the offices reviewing their facilities before our review; let us know if you need help pulling numbers or anything.

~ Greg D.

2.3 FAQ: Reporting and Shut Down

From: DeAngelo, Gregory
Sent: Monday, February 08, 2010 8:35 AM
To: Parmer, Cadedra
Subject: RE: AOR Teleconference SUMMARY - Tuesday February 2, 2010

[The requirement to submit is here:](#)

62-210.370(3) Annual Operating Report for Air Pollutant Emitting Facility.
(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:

1. All Title V sources.
2. All synthetic non-Title V sources.
3. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
4. All facilities for which an annual operating report is required by rule or permit.

[And cold standby / permanently shut down facilities are addressed on the very first page of the instructions to the form:](#)

Section I of DEP form number 62-210.900(5), Facility Report, must be submitted for each air pollutant emitting facility required to file the form, including any facility which was on cold standby or otherwise did not operate during the year for which data are being reported (the "reporting year"). Section I of the form should also be submitted for any facility that was permanently shut down during the reporting year.

Section II of DEP form number 62-210.900(5), Emissions Unit Report, must be submitted annually for each reportable emissions unit within the facility, including any such emissions unit which operated part of the year but was permanently shut down during the reporting year.

[Remember that the form and the instructions are part of the rules, Rule 62-210.900\(5\), F.A.C.](#)

~ Greg D.

[Greg DeAngelo](#)
DARM // Office of Policy Analysis
and Program Management
Gregory.DeAngelo@dep.state.fl.us
(850) 921-9548 [phone](#)
(850) 922-6979 [fax](#)

From: Parmer, Cadedra
Sent: Monday, February 08, 2010 7:33 AM
To: DeAngelo, Gregory
Subject: FW: AOR Teleconference SUMMARY - Tuesday February 2, 2010

Greg,

Could you please reply to Wayne Martin's email below? Thanks.

Cadedra

From: Martin, Wayne R [\[mailto:wmartin@co.pinellas.fl.us\]](mailto:wmartin@co.pinellas.fl.us)
Sent: Friday, February 05, 2010 11:33 AM
To: Parmer, Cadedra
Subject: RE: AOR Teleconference SUMMARY - Tuesday February 2, 2010

Cadedra,

What rule might you be considering when you say, "As a reminder, a facility that shuts down during the reporting year is still required to submit an AOR covering the period of time that it was operating."

I know Title V facilities have some post shutdown, reporting requirements, but not sure about a rule that requires other facilities to do the same.

Wayne R. Martin
Environmental Program Manager
Pinellas County: Air Quality Division
300 S. Garden Avenue
Clearwater, Florida 33756
727-464-4422
727-464-4420 [fax]

From: Parmer, Cadedra [\[mailto:Cadedra.Parmer@dep.state.fl.us\]](mailto:Cadedra.Parmer@dep.state.fl.us)
Sent: Friday, February 05, 2010 10:21 AM
To: Parmer, Cadedra; rodrigue@epchc.org; lynna@epchc.org; Bahtic, Nedin; Froberg, William R; Bradburn, Rick; CBITTLE@broward.org; cpitters@broward.org; Culliver, Sherrill; Delosantos, Manuel; Lee@epchc.org; Felton-Smith, Rita; Robbins, Gary W; 'Golden, Jason'; Graham, Joseph; Grim, Jay; Hoefert, Lee; ilka.bundy@ocfl.net; Jane.Heppner@ocfl.net; Jodi.Dittell@ocfl.net; John.Kasper@ocfl.net; 'Jordahl, Claire (DERM)'; Knight, Nancy; laxmana_tallam@doh.state.fl.us; Lewis, Wayne; 'Liu, Pwu-Sheng'; TILLEY@coj.net; MuthiM@miamidade.gov; Evans, Mary C; McCann, Matthew G; Melton, Carol; Mitchell, Erica; Nasca, Mara; Neginsky, Raisa; Parker, Wanda; PSHELTON@broward.org; Paul_Kalamaras@doh.state.fl.us; Randall_Miller@doh.state.fl.us; GordoR@miamidade.gov; Rice, Rodell; Satyal, Ajaya; Schroeder, Bill; SJAIRAM@broward.org; Shine, Caroline; scameron@scgov.net; 'Waters, Jason'; Martin, Wayne R; Wolfe, Janice; Young, Michael; Henry, Danielle D.; Lurix, Joe; Claridge, Kevin; Anderson, Lennon; Pickering, Malik A.; Noor, Quaid; Waltrip, Jennifer; Stoll, Christopher; 'March, Marta (DERM)'; Kuberski, Garry; Soptei, Robert J
Cc: DeAngelo, Gregory; Lanh, Kris; Miesel, Tiffany; Stevens, Kelly; Rogers, Tom; Brice, Shenita N.; Sexton, Will; Zhu, Yi
Subject: AOR Teleconference SUMMARY - Tuesday February 2, 2010

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: NEDV and SWSA

2. EAOR Reviewer Status – The new version of the EAOR Reviewer software is now available. Please see the attached document for details.
3. EAOR Reviewer Training - The following offices have expressed an interest in an EAOR Reviewer web-based training: NWD, SD, SEBR, SED, and SWPN. If your office is interested, please let me know. The date and time of this training will be announced at a later date.
4. 2009 AOR
- Submittals to Date - DARM has received 97 submittals as of today (96 EAOR submittals and 1 email submittal)
 - Signature Pages - DARM has started receiving signature pages. We will begin processing them and forwarding them onto you by the end of the month. Also, starting this year we will scan and attach the signature pages in EAOR Reviewer as well.
 - AOR Review - Last year we asked those offices interested in reviewing their AOR submittals prior to DARM's review and upload to agree to a review schedule. This arrangement seemed to work well. We would like your input on how/if this worked for you. Taking into consideration the limited resources we are all facing, we're not certain how much staff or time your office can devote to the review. Remember that you are not required to review the EAOR submittals prior to the DARM review and upload. You can review the submittals when your time, resources, and schedule allow. But, if a facility's submittal has been uploaded into ARMS and you need to make some changes, you will need to notify DARM to request that it is released. This topic will be further discussed at the C&E Workshop – Inventory session. We would greatly appreciate your input and any ideas you have about how to make the process more efficient.
5. As a reminder, a facility that shuts down during the reporting year is still required to submit an AOR covering the period of time that it was operating. If a facility calls DARM inquiring as to whether or not it has to submit a 2009 AOR if it shutdown during the reporting year, we will remind the facility of their obligation and forward the call to the appropriate district or local program office for follow-up. It is at your discretion whether to pursue enforcement if the facility does not submit the AOR.

Thanks to all of you and I look forward to seeing each of you at the C&E Workshop in a couple of weeks!

Cadedra Parmer Hodge
Environmental Specialist
Florida Department of Environmental Protection
Division of Air Resource Management
Phone: (850) 921-9590

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communication may therefore be subject to public disclosure.

2.4 Processing AOR Signature Pages

For Report Years, 2010 and Later

The electronic signature was implemented with the 2010 report year. If a facility submits electronically (i.e. web, disk, or email), they can sign electronically. However, if a user is unable to register an account and request a PIN to electronic sign, they may submit hardcopy signature pages. The hardcopy signature pages will be processed as follows:

1. Verify the following for each set of signature pages/attachments received:
 - the date stamp has been stamped on the signature page
 - the year of report is 2010 (if different, please inform Cadedra)
 - the Facility ID on page 1 and page 2 of the signature pages are the same (if different, please inform Cadedra)
2. If a cover letter or memo is attached, read it to see if there is reference to an attached disk or CD or if there is any other pertinent information. If the letter or memo references a disk or CD, confirm that it is attached.
3. If a hardcopy AOR is received, enter the date received in the “Hardcopy” column in XXXXAOR.xlsx (where ‘XXXX’ refers to the report year).
4. Utilize the “Comment” field in XXXXAOR.xls to enter additional information about submittal (i.e. Statement of Compliance (SOC) received, additional signature pages received but there is only one submission, etc.)
5. Sort signature pages by office.
6. Give signature pages/attachments to Kathleen Carr to scan onto O-drive. Be sure you insert a scan slip (sheet of paper provided by Kathleen) between each set of facility signature pages/attachments. Kathleen will return the signature pages/attachments to you after she has scanned them.

Note: If you scan the attachments yourself, please be sure to scan the file as a small file. Also, save a copy of all signature pages on O-drive in its respective office folder (O:\Opapm\YI\EAOR\XXXXSUBMIT) in the ATT folder (where ‘XXXX’ refers to the report year).

7. Once, Kathleen returns the signature pages/attachments, check that the documents were scanned correctly. As you check each document, rename each using the Facility ID as the file name.
8. If the signature page has a disk or CD attached:
 - Save the data file (.SUB extension) on O-drive (O:\Opapm\YI\EAOR\XXXX SUBMIT), where ‘XXXX’ refers to the report year, in the respective district or local program office folder. If there are attachments saved on the disk or CD, please save them here as well. If the disk or CD is blank, please inform Cadedra.
 - Right click on data file and scan for threats. If there are no threats, proceed to the next step. If there are threats, please inform Cadedra.

- In EAOR Reviewer, select the “Import into Oracle Database” option on the Easy Start Menu. Browse to select the location where the data file has been saved. The “Date Received” should be the date stamp date and the “Received By” should be disk (whether CD or Disk). Cadedra will import the email submissions received.
9. Attach scanned signature pages and attachments in EAOR Reviewer to the appropriate facility and save. Attachment Description should be “Signature Pages/Attachments - Attached by DARM.” If there are multiple facilities that are mentioned on an attachment, the attachment should be attached to each of the facilities.
 - If the facility sends an entire AOR and the facility did not submit its data electronically, scan and save the entire report on o-drive to the following location in its respective office folder: O:\Opapm\YI\EAOR\XXXXSUBMIT), where ‘XXXX’ refers to the report year.
 10. Verify the following:
 - Attachments that you attached are viewable
 - The file name corresponds to the correct facility ID
 11. Verify facility data (Easy Start Menu). There should be no errors. If there are any errors, please inform Cadedra.
 12. Forward hardcopy AORs, signature pages, and attachments onto the district/local program offices.

Keep in Mind

- Please do not discard the envelope the signature pages and attachments were received in until after you are certain that the data file is in EAOR (regardless of whether the facility submitted through the web or sent us the disk) and that the data file passes verification (Step 11above). If there are problems sometimes the envelope has additional or the only contact information.

Resources

(See following pages).

2.5 Reviewing Acid Rain and CAIR Units

The “**AcidRain&CAIRUnits 2011.xls**” spreadsheet (located here: **O:\Opapm\YI\EAOR\2011 AOR Review_Important Info**) catalogs EPA’s preliminary Acid Rain and CAIR unit data for 2011 which you can use to double check Acid Rain Units and CAIR Units that have questionable **NOX** and/or **SO2** emissions...

► If you are reviewing an “**Acid Rain Unit**” or a “**CAIR Unit**” and you see a problem w/ **NOX** and/or **SO2**, use this spreadsheet to verify the emissions. (Most times the EU description signifies whether a unit is an Acid Rain Unit or CAIR Unit. However, in general, these units are usually large units found in electric power facilities. For TV permits, you can look up units that are cover by acid rain or CAIR. You can also look in ARMS - EU→Program).

1. In the spreadsheet, look up your facility by its Facility ID.
2. Once you locate your Facility, find the EU(s) that you wish to verify – Pay close attention to the **Unit ID** in the spreadsheet as it is most likely different from ID’s used in ARMS. Look at how the units are identified in the EU Description and it should be fairly obvious which EU they are referring to.
3. Finally, compare the questionable NOX and/or SO2 emissions in EAOR to the Acid Rain and CAIR Data:
 - Emissions in the spreadsheet may not correspond *exactly* to those in EAOR, but they should be relatively close. If the numbers are extremely different, then log this in the “**2011upload.xlsx**” spreadsheet.
 - If an EU has several SCC, the facility may choose to report their emissions on one primary SCC. Or they may split the total among each SCC. In this case, you should use the “**Emission Report by EU**” to compare the EU totals to the Acid Rain Data and CAIR Data – this is b/c the Acid Rain Data and CAIR Data represents the EU total for these particular pollutants.

Resources

(See following pages).

2.6 Reviewing Resubmissions

Often time facility will submit a revision to their original AOR. We commonly refer to these as Resubmissions. EAOR identify resubmissions as SUB2, SUB3, and so forth. To review resubmissions follow these steps:

1. Set the data source in EAOR to SUB1(the original submissions) on the left side and SUB2(the resubmissions) on the right side.
2. Compare the two data sets for any data difference. Each difference will be indicated with a yellow triangle called the difference indicator. Reviewer can use the Facility Detailed Report to help with this process. This report will list the section in EAOR where the differences occur. It will not list the actual data difference.
3. Identify and log all differences.
4. Investigate and form conclusion whether these differences are acceptable or further clarification is needed. This can be accomplished by looking at attachments, cover letters, or the permit.
5. For resubmissions that arrive after DEP completed the review, additional steps are required.
 - i. Compare the resubmissions with the original submissions to see what data the facility changed.
 - ii. Compare the resubmissions with the DEP Revised Copy to see what DEP or D/L have changed

Reviewing Multiple Submissions

In cases where facility submits multiple submissions, each submission must be compare with the original submittal for any data change. Similar to the resubmission, EAOR will identify each submission as SUB1, SUB2, SUB3, and so forth. The reviewer should log whatever data changes between each submission. To review multiple submissions, follow the same procedure as reviewing the resubmissions.

Replacing Original Submittal with Revision

Once reviewing the resubmission is complete and is determine that the original submittal should be replaced with the revision, reviewer can replace the DEP copy with the new resubmission using the Replace Facility function in EAOR. Keep in mind that all of the data on the original submittal will be replace with the revision data. Thus any change the reviewer made to the original DEP copy will be replaced with whatever in the revision. The project lead person should recommend whether or not to replace the DEP Copy with revision.

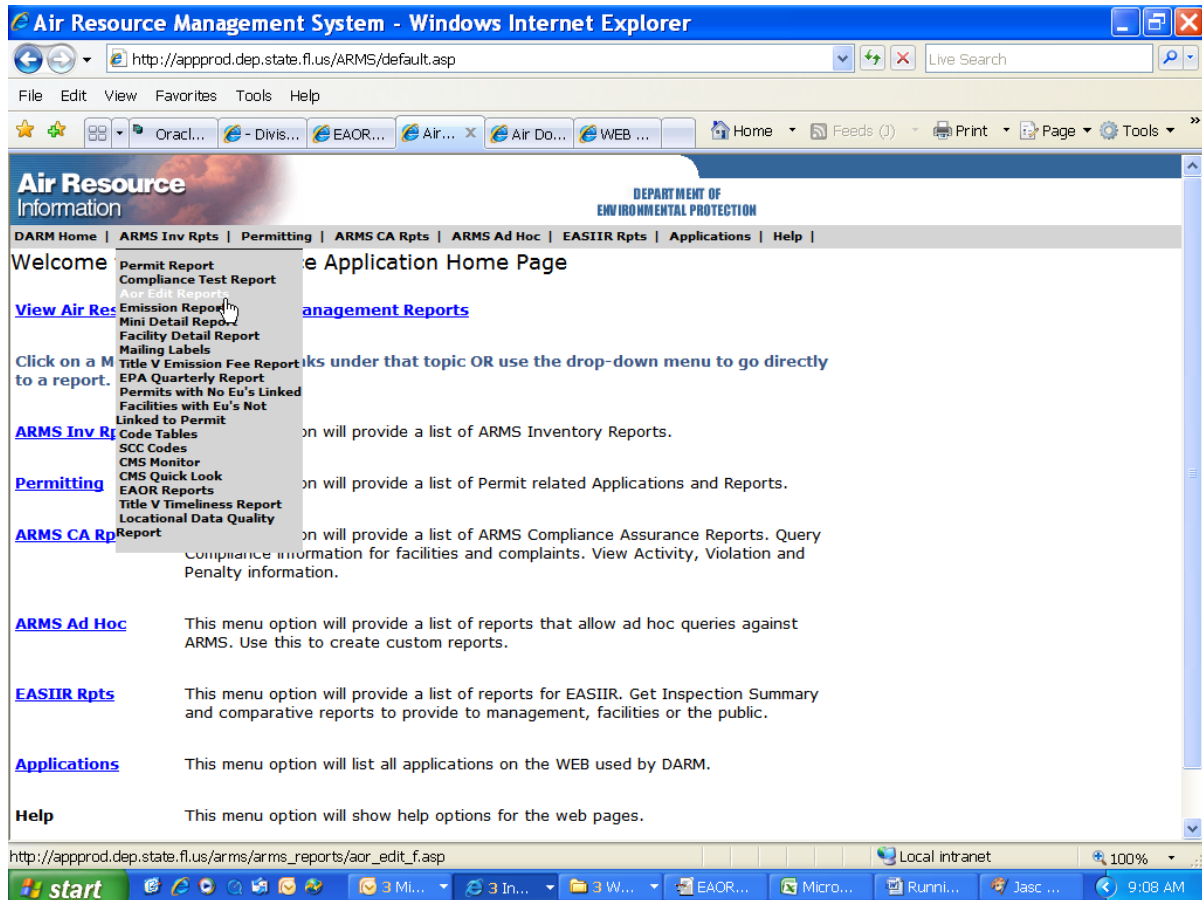
Resources

(See following pages.)

2.7 Running the AOR Edit Report

The AOR Edit Reports are used as part of the AOR Edit Checks. The AOR Edit Reports are run by the district and local offices. This is usually done once all of the AOR data for an office is uploaded into ARMS because the reports use the data in ARMS as a comparison. Staff should work with their permitting and compliance staff to resolve “issues” found on these reports.

1. Select AOR Edit Reports from the ARMS Inv Rpts menu (see screenshot below).



2. Run report with the following selections (see screenshot below).

Report Type = 99 (all edit checks)

EU classification = R and U

Year = reporting year

Select an office

The screenshot shows a web browser window titled "ARMS Inventory Reports - Windows Internet Explorer". The address bar shows the URL: http://appprod.dep.state.fl.us/arms/arms_reports/aor_edit_f.asp. The browser's menu bar includes File, Edit, View, Favorites, Tools, and Help. The toolbar shows various icons for navigation and printing. The main content area displays the "Air Resource Information" header for the "DEPARTMENT OF ENVIRONMENTAL PROTECTION". Below this is a navigation menu with links: DARM Home, ARMS Inv Rpts, Permitting, ARMS CA Rpts, ARMS Ad Hoc, EASIIR Rpts, Applications, and Help. The main heading is "AOR Edit Report Filter" with a version link "Version: 2009-1A". A note states: "Data for this Report is One Day Old Production Data." and a link for "Report Description". The form contains the following fields and controls:

- Report Type:** A dropdown menu set to "99: ALL EDIT REPORTS".
- AIRS ID:** A text input field.
- Facility Office:** A dropdown menu set to "Select Office".
- County:** A dropdown menu.
- EU Class:** A dropdown menu set to "B: Regulated and Unregulated EUs".
- Year:** A text input field set to "2010".
- Difference %:** A dropdown menu with a note: "This percentage is to be used with report types 22, 23, 24, 25, and 26 only."
- Output:** A dropdown menu set to "Browser".

At the bottom of the form are "Submit" and "Reset" buttons. A disclaimer at the bottom of the page reads: "This report may take couple of minutes to run. Occasionally the network gets busy and a State Wide report may time out. If a time out occurs, please run the report by Office." The Windows taskbar at the bottom shows the Start button, several open applications, and the system clock displaying 9:18 AM on 10/18/2009.

- Please refer to the AOR Edit Report Types below. Keep in mind that the edit check reports should be used as prompts to further investigate the data and determine whether a compliance issue exists.

Please resolve or address all of the “issues” found on these reports. Once all of the “issues” found on these reports have been resolved or addressed (explained with a reasonable explanation), the district and locals should make sure that each AOR activity for the reporting year has a date done and the correct compliance status entered in ARMS. The Facility Activities report can be used to verify this (please see the following section).

AOR Edit Report Types

Report Type 1 Missing AOR Report – This report lists all EUs that should have an AOR for the reporting year, but none is entered. It includes EUs that are active or under construction in a facility that is required for AOR. It also includes inactive EUs that have a permanent shutdown date in the reporting year. If the first permit for an EU is issued after the reporting year, this EU is excluded. If the EU type is 12.01 to 12.03, this EU is

also excluded. If the AOR requirement is new (after the reporting year), the district/local office needs to explain it (it will stay on the report).

Report Type 2 Missing 4-Digit SIC – This report lists facilities with AOR records but do not have a 4-digit SIC code (Facility screen → Details → SIC).

Report Type 3 AOR Operating Schedule – This report lists EUs with the reported operating schedule (hours/day, days/week, hours/year) exceeds the permitted operating schedule (EU screen → EU Details → Schedule).

Report Type 6 Missing % Operation by Season – This report lists EUs that operated, but are missing % operation by season (currently only covers facilities that are ozone SIP facility, but it should be statewide).

Report Type 7 Missing Stack Parameter – This report lists EUs that operated, but are missing stack parameters. For stacks (type 1 – 3), it requires stack height and exit diameter. For fugitive emissions (type 4), it requires non-stack height (EU screen → Emission Point).

Report Type 8 Opeated, Missing Process Rates – This report lists EUs that operated during the reporting year, but no annual process rate is entered.

Report Type 9 Opeated, Missing Emissions – This report lists EUs that operated during the reporting year, but no annual emission is entered.

Report Type 10 Excess Process Rate – This report lists SCCs with reported annual process rate larger than the permit limit (EU screen → EU Details → Segment: annual rate limit).

Report Type 11 Excess Sulfur – This report lists SCCs with reported sulfur content larger than the permit limit (EU screen → EU Details → Segment: percent sulfur limit).

Report Type 12 Excess Ash – This report lists SCCs with reported ash content larger than the permit limit (EU screen → EU Details → Segment: max percent ash).

Report Type 13 Excess Heat Input – This report lists EUs with the following data.

$[\text{Max heat input (mmBtu/hour)} \times \text{Hours/year}] < [\text{Annual process rate} \times \text{Heat content}]$

Report Type 14 Missing Control Equipment – This report lists pollutants with a control efficiency, but no control equipment (AOR → AOR Segment Pollutants).

Report Type 15 Excess Emissions – This report lists pollutants with reported annual emission larger than the permit limit (EU screen → Pollutant → Allowable: equivalent tons/year). If more than one allowable emission exists, the highest equivalent

tons/year will be used. Allowable emissions with effective date after the reporting year are not included.

Report Type 16 Missing Actual Emissions – This report lists pollutants with allowable emission, but no annual emission is reported. This report covers only EUs that operated during the reporting year and the allowable emission unit is not one of these ('06','13','97','98'), and the future effective date is not after the reporting year. If no emission of this pollutant is emitted, a zero should be entered in the annual emission field.

Report Type 17 AOR SCC EDIT (COAL) – This report lists SCCs for combustion of coal with a non zero annual process rate, but one of the following is missing: sulfur content, ash content, heat content.

Report Type 18 AOR SCC EDIT (COAL) – This report lists SCCs for combustion of fuel oil with a non zero annual process rate, but one of the following is missing: sulfur content, heat content.

Report Type 19 AOR SCC EDIT (COAL) – This report lists SCCs for combustion of gas with a non zero annual process rate, but the heat content is missing.

Report Type 20 Exceeded Emission Cap – This report lists pollutants with reported annual emission larger than emission cap. If the emission cap is facility-wide (no EU is listed under Capped EU: Facility screen → Pollutant → Capped EU), the cap will be compared with the total reported emission for the facility. If the emission cap is a multi-unit cap (EUs listed under Capped EU), the cap will be compared with the total reported emission from the EUs on the Capped EU list.

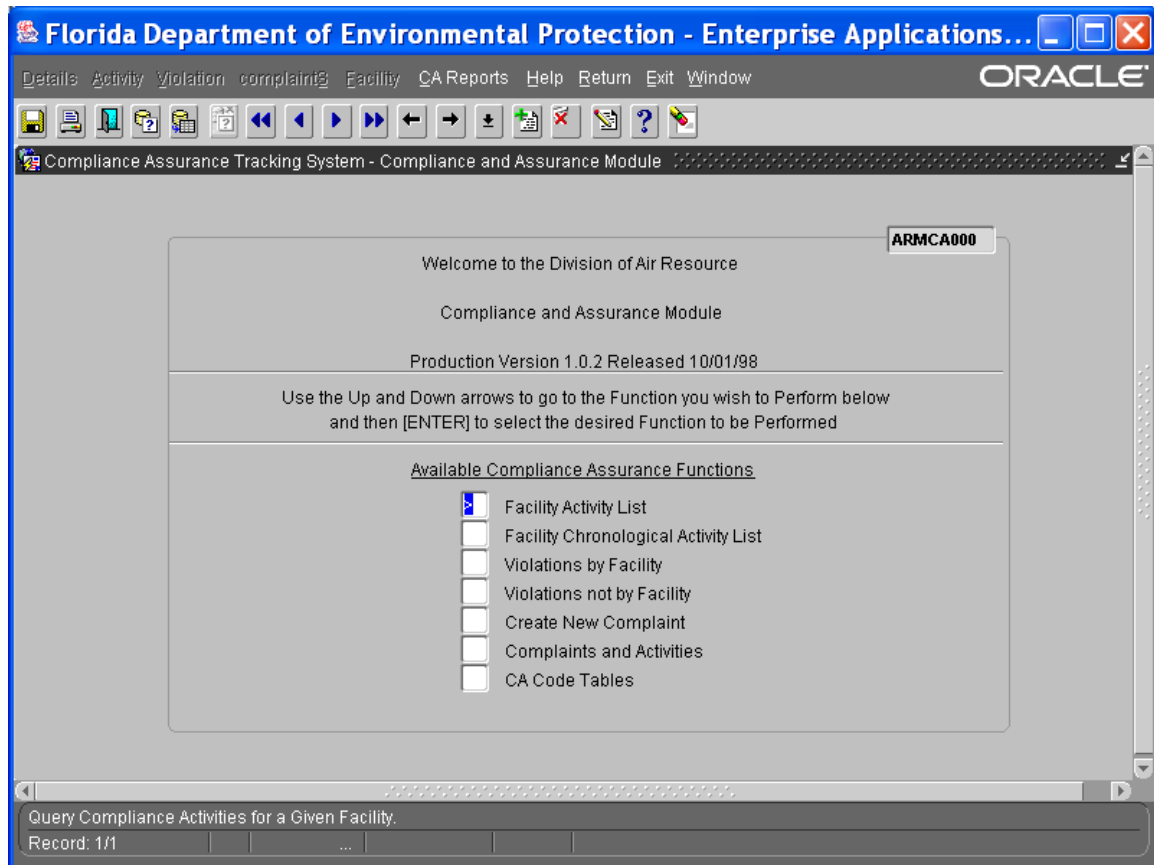
Report Type 21 Missing Cap Emissions – This report lists pollutants with an emission cap, but the annual emission is missing. If the cap is facility-wide, the report will cover all EUs with this pollutant and the pollutant status is active. If the cap is multi-unit, the report will cover only the EUs that are covered under the cap.

Report Type 22 to 26 – These reports allow you to compare the data for the reporting year with the data of previous year. These are helpful when looking at the consistency of the data over time.

Report Type 27 Possible Duplicate Emissions – This report lists pollutants with identical emissions on more than one SCC in an emissions unit.

Facility Activities

1. Login to ARMS Oracle Database.
2. Go to Compl Assur module.
3. Select Facility Activity List (see screenshot below).



4. On the query screen, enter Office, AOR for Activity, and the Date Due (see screenshot below).

Florida Department of Environmental Protection - Enterprise Applications...

Details Activity Violation complaints Facility CA Reports Help Return Exit Window

ORACLE

Compliance Assurance Tracking System - ARMS Facility Selection

Select ARMS Facility

Enter the desired selection criteria and press [EXECUTE QUERY].

AIRS ID OR

(1)AIRS ID (2)Facility Category (3)Office **SWPN**

(4)County (5)Facility Status or

(6)Owner

(7)Name

(8)City

Sort Order of Facilities

Primary Sort Field **6** Secondary Sort Field **1**

Compliance Activity Selection to be applied to Selected Facility

Compliance Assurance INSP ☐ AOR ☒ Test and Report ☐ CEM ☐

Activity Compliance Status Status 1 Status 2

Activity Code

Date Done - OR - Begin Date End Date

Date Due **09/30/2011** - OR - Begin Date End Date

Enter the begin date for a date due range search.

Record: 1/1

5. Execute query. A list of facilities that meet the selection criteria will be displayed (see screenshot below).

Florida Department of Environmental Protection - Enterprise Applications...

Details Activity Violation complaint Facility CA Reports Help Return Exit Window

ORACLE

Facility Selection Criteria

Facilities Meeting the Facility Selection Criteria

ARMCA003

AIRS ID Fac Cat	Owner Facility Name	Street Addr City	County Office	Fac Stat
1030155 POINT	COASTAL STEEL CONSTRUCTION, INC. TE COASTAL STEEL CONSTRUCTION,	1000 31ST STREET SOUTH ST. PETERSBURGH	Pinellas SWPH	C
1030013 POINT	FL POWER CORPDBAPROGRESS ENERGY F BAYBORO POWER PLNT	13th AVE & 2nd ST SOUTH ST. PETERSBURG...TEST	Pinellas SWPH	A
1030197 POINT	MEDLINE INDUSTRIES, INC. - TEST MEDLINE INDUSTRIES, INC. - TEST	401 COMMERCE BOULEVAF OLDSMAR - TEST	Pinellas SWPH	A
1030209 POINT	TRANSITIONS OPTICAL, INC.TEST TRANSITIONS OPTICAL, INC.TEST	9251 BELCHER ROAD.....TES PINELLAS PARK.....TEST	Pinellas SWPH	C

AIRS ID of the highlighted Facility.

Record: 1/4

6. Select a facility.
7. Select the AOR Activity that corresponds to the report year.
8. Enter the Date Done, the Compliance Status, and save (see screenshot below).
Repeat this for each of the facilities within your office, using the list generated in step 5.

Enter Date
Done here.

Florida Department of Environmental Protection - Enterprise Applications... ORACLE

Details Activity Violation Complaints Facility CA Reports Help Return Exit Window

Compliance Assurance Tracking System - Compliance Activity

POINT AIRS ID 0010001 Status A Owner FLORIDA POWER CORPORATION D/B/A PROGR
Office NED County Alachua Name U Of Fl Cogen

ARMCA011

Compliance Activity Detail

CA * AOR Activity * AOR ANNUAL OPERATING REPORT REVIEW # Viol 0
Date Done Date Due 09/30/2009 Office * NED Ev Y Act CS IN
Notes 2008 AOR REVIEW. VCS

Obj Type	Obj Num	S T	Object Description	Cmpl Stat	Viol CS	Comments
EU	001	A	GE LM6000-PA Combustion Turbine	IN		
EU	002	A	NO.4 STEAM BOILER	IN		
EU	003	A	NO.5 STEAM BOILER	IN		
EU	004	I	DISMANTLED - #2 STEAM GEN NAT GAS	IN		
EU	005	A	DUCT BURNER SYSTEM ASSOCIATED W	IN		
EU	007	A	NEW LM6000PC-ESPRINT COMBUSTION	IN		
EU	008	A	Venkat's test EU	IN		

The Compliance Assurance Category the Activity is being performed under.
Record: 1/1

Enter the
Compliance
Status for each
EU here.

9. To confirm that you have entered a Date Done for all facilities within your office, select Facility Activities from the ARMS CA Rpts menu (see screenshot below).

Air Resource Management System - Windows Internet Explorer

http://appprod.dep.state.fl.us/ARMS/default.asp

File Edit View Favorites Tools Help

Oract... - Divis... EAOR... Air... Air Do... WEB ... Home Feeds (0) Print Page Tools

Air Resource Information

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DARM Home | ARMS Inv Rpts | Permitting | ARMS CA Rpts | ARMS Ad Hoc | EASIIR Rpts | Applications | Help

Welcome to the Air Resource Page

View Air Resource Data Quality/Management

Click on a Menu Title for a list of links to a report.

ARMS Inv Rpts This menu option will provide a list of reports that allow ad hoc queries against ARMS. Use this to create custom reports.

Permitting This menu option will provide a list of reports for EASIIR. Get Inspection Summary and comparative reports to provide to management, facilities or the public.

ARMS CA Rpts This menu option will provide a list of reports for EASIIR. Get Inspection Summary and comparative reports to provide to management, facilities or the public.

ARMS Ad Hoc This menu option will provide a list of reports for EASIIR. Get Inspection Summary and comparative reports to provide to management, facilities or the public.

EASIIR Rpts This menu option will provide a list of reports for EASIIR. Get Inspection Summary and comparative reports to provide to management, facilities or the public.

Applications This menu option will list all applications on the WEB used by DARM.

Help This menu option will show help options for the web pages.

Complaint Activities
Complaints Not Insp.
Compliance Test Report
Compliance Inspections
Facility Activities (Chrono)
Full Compliance Evaluation
Facility No Activities
Management Reports
Morning Reports
Morn Poll/VE Not Linked
Penalty
Penalty Status
Violation Quick Look
Violation Types
CEMS Flagged - CA Method
CEMS Missing Reports
CEMS Monitor
CEMS Quick Look
Locational Data Quality
Report

http://appprod.dep.state.fl.us/arms/ca_reports/facility_latest_activity_f.asp

Local intranet 100%

start 4 Mi... 2 In... 3 W... EAOR... Micro... Runni... Jasc ... 9:26 AM

Run report with the following selections:

Select an activity office.

Activity Code = AOR

Date Done: Check blank box

Date Due = 9/30/XXXX, where XXXX = current year (in both begin and end date box)

This gives you a list of facilities that the date done is missing.

10. District and locals email DARM indicating the completion of the review. All offices should complete its edit checks by September 30th.

Confirm Completion of AOR Review

District and local offices email DARM indicating the completion of review. DARM will verify and confirm that they are complete, using the AOR Edit Reports and Facility Activities Report. All items left on the edit reports must be explained with a reason. Each AOR activity for the reporting year must have a date done and the correct compliance status. The date done should be the date that the edit check is complete and compliance determination is made.

Resources

(See following pages.)

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Emissions Unit Form

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FAQ: Landfill Emission Factors	7/9/2010
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3.1 AOR General Instructions

INSTRUCTIONS FOR DEP FORM NO. 62-210.900(5)

ANNUAL OPERATING REPORT FOR AIR POLLUTANT EMITTING FACILITY

GENERAL INSTRUCTIONS

In accordance with Rule 62-210.370 (3), F.A.C., the Annual Operating Report for Air Pollutant Emitting Facility (DEP form number 62-210.900(5)) shall be completed each year for the following facilities:

1. All Title V sources.
2. All synthetic non-Title V sources.
3. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
4. All facilities for which an annual operating report is required by rule or permit.

Notwithstanding the above, no annual operating report shall be required for any facility operating under an air general permit.

The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the department's Electronic Annual Operating Report (EAOR) software, there is no requirement to submit a copy to the DEP district or local air program office.

Section I of DEP form number 62-210.900(5), Facility Report, must be submitted for each air pollutant emitting facility required to file the form, including any facility which was on cold standby or otherwise did not operate during the year for which data are being reported (the "reporting year"). Section I of the form should also be submitted for any facility that was permanently shut down during the reporting year.

Section II of DEP form number 62-210.900(5), Emissions Unit Report, must be submitted annually for each reportable emissions unit within the facility, including any such emissions unit which operated part of the year but was permanently shut down during the reporting year.

The terms "facility" and "emissions unit," and other technical and regulatory terms that appear in these instructions, have the meanings ascribed to them in Rule 62-210.200, F.A.C.

The department strongly encourages facilities to complete and submit the annual operating report electronically using the department's EAOR software, available for download at www.dep.state.fl.us/air. The EAOR software partially prefills the form with data from the department's Air Resources Management System (ARMS) that are not expected to change from year to year. The owner or operator is expected to enter data specific to the reporting year (e.g., actual process/fuel usage rates and pollutant emissions) and correct any errors or omissions in the prefilled ARMS data. In the case of any prefilled data element, the term "enter" as it appears in

these instructions should be read to mean “verify.” The electronic report shall be submitted to the department following directions for use of the EAOR software.

The department will also accept hardcopy reports submitted using a computer-generated, partially prefilled form. Hardcopy reports shall be submitted to the appropriate DEP district or DEP-approved local air pollution control program office.

The department will post procedures for obtaining the latest version of the EAOR software or a computer-generated, partially prefilled hardcopy form on its website at www.dep.state.fl.us/air.

Resources

(See following pages.)

The screenshot shows a software application window titled 'Begin Comparative Edit and Review.' with a menu bar (File, Edit, EAOR, Window, Help) and a toolbar. The main workspace is divided into two panes: 'DEP Revised AOR Data 2009' and 'Local ARMS Data 2008'. Each pane contains a form with the following sections:

- A. REPORT INFORMATION**
 - 1. Year of Report: 2009 (left) / 2008 (right)
 - 2. Number of Emissions Units: 4 (left) / 4 (right)
- B. FACILITY INFORMATION**
 - 1. Facility ID: 0010001 (left) / 0010001 (right)
 - 2. Facility Status: ACTIVE (left) / ACTIVE (right)
 - 3. Date of Permanent Facility Shutdown: (left) / (right)
 - 4. Facility Owner/Company Name: FLORIDA POWER CORPORATION D/B/A PROGRESS (left) / FLORIDA POWER CORPORATION D/B/A PROGRESS (right)
 - 5. Site Name: U OF FL COGEN (left) / U OF FL COGEN (right)
- SUBMISSION INFORMATION**
 - Media: WEB (left) / WEB (right)
 - Date Received: 3/30/2010 (left) / 4/30/2009 (right)
 - Date Reviewed: 6/7/2010 (left) / 5/26/2009 (right)
 - Signature Page Date Received: 4/5/2010 (left) / (right)

The status bar at the bottom indicates 'Ready' and 'Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008'.

Fig. 1: Screenshot of Section A and B in Facility Form, report and facility information.

3. 2 Facility Form: Section A and B

A. REPORT INFORMATION

1. **Year of Report** - Enter the year of the data given in this report (the “reporting year”).
2. **Number of Emissions Units in Report** - Enter the number of emissions units included in this report. A separate Section II of the form must be completed for each reportable emissions unit at the facility. See Section II of the instructions for additional information on the reporting of emissions units.

B. FACILITY INFORMATION

1. **Facility ID** - If known, enter the DEP seven-digit facility identification number.
2. **Facility Status** - Enter, from the list below, the facility status code valid as of December 31 of the reporting year.

Code Status

- A Active - One or more emissions units in operation, on standby status, temporarily shut down (including any shutdown while undergoing modification), or on long-term reserve shutdown. This code indicates an existing facility which has not been permanently shut down, though it may not be operating at the time of this report.
- C Construction - All emissions units in planning stage or undergoing initial construction, including reconstruction. This code indicates a proposed new facility, or an existing facility which has been or will be shut down in its entirety for reconstruction.
- I Inactive - All emissions units permanently shutdown; permit(s) surrendered or expired.

3. **Date of Permanent Facility Shutdown** - If the facility was permanently shut down during the reporting year, enter the date of cessation of all operations.
4. **Facility Owner/Company Name** - Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility. Common abbreviations should be used with blanks left between each word to insure readable entries (e.g., Fla. Electric Co., U.S. Pulp Inc., Dept. of Health, etc.).
5. **Site Name** - Enter the common name, if any, of the facility site addressed in this report (e.g., Okeechobee Plant, Fernandina Mill, Fla. State Hospital, etc.). Also use this field to enter any alias name under which the corporate owner of the facility is doing business at this facility location.

Resources

(See following pages.)

The screenshot displays a software interface for the Facility Form, Section B (Cont). The interface is divided into two main panels: 'DEP Revised AOR Data 2009' on the left and 'Local ARMS Data 2008' on the right. Both panels contain identical form fields for facility information.

DEP Revised AOR Data 2009 Panel:

- Section B (Cont):** B. FACILITY INFORMATION (Cont)
- 6. Facility Location:**
 - Street Address or Other Locator: MOWERY RD AT U OF FL
 - City: GAINESVILLE
 - County: ALACHUA (dropdown menu)
 - Zip Code: 32611
- 7. Governmental Facility Code:** NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR LOCAL GOVERNMENT (dropdown menu)

Local ARMS Data 2008 Panel:

- Section B (Cont):** B. FACILITY INFORMATION (Cont)
- 6. Facility Location:**
 - Street Address or Other Locator: MOWERY RD AT U OF FL
 - City: GAINESVILLE
 - County: ALACHUA
 - Zip Code: 32611
- 7. Governmental Facility Code:** NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR LOCAL GOVERNMENT

The bottom status bar shows 'Ready' and 'Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008'.

Fig. 2: Screenshot of Section B (Cont) in Facility Form, facility information continued.

3.3 Facility Form: Section B (Cont)

B. FACILITY INFORMATION

6. Facility Location

Street Address or Other Locator - Enter the street address or approximate location of the facility as shown on a road map. This may be an intersection description or any locator which will allow a person unfamiliar with the facility to determine its physical location (e.g., 3 mi. W. of U.S. 41 off S.R. 786; etc.). For relocatable facilities, enter the current location.

City - Enter the name of the city in which the facility is located. If the facility is not located within city limits, enter the name of the nearest city preceded by "N. of," "W. of," etc.

County - Enter the name of the county in which the facility is located.

Zip Code - Enter the five-digit postal zip code of the facility's physical location (not necessarily the mailing address zip code).

7. **Governmental Facility Code** - If the owner or operator of the facility is a unit of government, enter, from the list below, the code for such unit of government. If the owner or operator is not a unit of government, enter "0."

Code Unit of Government

0 None (non-governmental facility)

1 Federal

2 State

3 County

4 Municipality

Resources

(See following pages.)

Go To Emissions Unit Form Save Exit

DEP Revised AOR Data 2009 Local ARMS Data 2008

Section A. and B Section B (Cont) Section B (Cont) and C Section D Section D (Cont) Section D (Cont 2) Attachments

B. FACILITY INFORMATION (Cont)

8. Facility SIC(s):

SIC	Primary
4911	☒
*	☐

9. Facility Comment:

TITLE V (MAJOR) Emissions provided from CEMs include startup/shutdown periods. Emissions estimates based on total fuel consumption including periods of

C. FACILITY HISTORY INFORMATION

1. Change in Facility Owner/Company Name During Year? ☐

Previous Name:

2. Date of Change:

Ready Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008

Fig. 3: Screenshot of Section B (Cont) and C in Facility Form, facility information continued and facility history information.

3.4 Facility Form: Section B (Cont) and C

B. FACILITY INFORMATION

8. **Facility SIC(s)** - If known, enter up to three four-digit Standard Industrial Classification (SIC) codes to precisely describe the economic activities of the facility. Four-digit SIC codes are listed in the 1987 Standard Industrial Classification Manual published by the U.S. Office of Management and Budget. If no four-digit code is known, leave blank.
9. **Facility Comment** - Enter any comments about the facility addressed in this report.

C. FACILITY HISTORY INFORMATION

1. **Change in Facility Owner/Company Name During Year?** - If the name of the individual or corporate owner of the facility was changed during the reporting year, enter the name by which the facility was previously known. If the facility also changed ownership during the

reporting year and an application for transfer of permit has not been previously submitted, submit such form at this time.

2. **Date of Change** - Enter the date of change of facility owner/company name.

Resources

(See following pages.)

The screenshot displays the Facility Form software interface. At the top is a menu bar with 'File', 'Edit', 'EAOR', 'Window', and 'Help'. Below the menu bar is a toolbar with various icons. The main window has a tabbed interface with tabs for 'Go To Emissions Unit Form', 'Save', and 'Exit'. The 'DEP Revised AOR Data 2010' tab is selected, showing 'Section D. OWNER / CONTACT INFORMATION'. The form includes fields for '1. Owner or Authorized Representative:' with sub-fields for First Name (RANDY), Middle Name, Last Name (SERFOZO), Suffix, and Job Title (GENERAL MANAGER). Below this is the 'Mailing Address' section with fields for Organization/Firm (SEA RAY BOATS, INC.), Street Address (350 SEA RAY DRIVE), City (MERRITT ISLAND), State (FL), Zip (32953), Phone ((321) 452-2930), Ext (5633), Fax ((321) 452-6158), and Email (rserfozo@searay.com). At the bottom is the 'Submission Information' section with a 'Signature Page Date Received' field set to 2/2/2011. The 'Local ARMS Data 2008' tab is also visible, showing similar fields for Jim Barclay. The status bar at the bottom indicates 'Ready' and 'Edit: DEP Revised AOR Data 2010 Ref: Local ARMS Data 2008'.

Fig. 4: Screenshot of Section D in Facility Form, owner or authorized representative. Note, the “signature page date received” is grayed out since signature pages are now required to be submitted electronically.

File Edit EAOR Window Help

Go To Emissions Unit Form Save Exit

DEP Revised AOR Data 2009 Local ARMS Data 2008

Section A and B Section B (Cont) Section B (Cont) and C Section D Section D (Cont) Section D (Cont 2) Attachments

D. OWNER / CONTACT INFORMATION

2. Report Contact:

First Name:

Middle Name:

Last Name:

Suffix:

Job Title:

Mailing Address

Organization/Firm

Street Address:

City:

State: Zip: -

Phone: Ext: Fax:

Email:

D. OWNER / CONTACT INFORMATION

2. Report Contact:

First Name:

Middle Name:

Last Name:

Suffix:

Job Title:

Mailing Address

Organization/Firm

Street Address:

City:

State: Zip: -

Phone: Ext: Fax:

Email:

Ready Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008

Fig. 5: Screenshot of Section D (Cont) in Facility Form, report contact.

File Edit EAOR Window Help

Go To Emissions Unit Form Save Exit

DEP Revised AOR Data 2009 Local ARMS Data 2008

Section A and B Section B (Cont) Section B (Cont) and C Section D Section D (Cont) Section D (Cont 2) Attachments

D. OWNER / CONTACT INFORMATION

3. Facility Contact:

First Name: DAVE

Middle Name: K.

Last Name: MEYER

Suffix:

Job Title: SENIOR ENVIRONMENTAL SPECIALIST

Mailing Address

Organization/Firm

FLORIDA POWER CORPORATION D/B/A PROGRESS ENERGY,

Street Address:

P.O. BOX 14042, PEF 903

City: ST. PETERSBURG

State: FL Zip: 33733 - 4042

Phone: (727) 820-5295 Ext: Fax: (727) 820-5229

Email: dave.meyer@pgnmail.com

D. OWNER / CONTACT INFORMATION

3. Facility Contact:

First Name: DAVE

Middle Name: K.

Last Name: MEYER

Suffix:

Job Title: SENIOR ENVIRONMENTAL SPECIALIST

Mailing Address

Organization/Firm

FLORIDA POWER CORPORATION D/B/A PROGRESS ENERGY,

Street Address:

P.O. BOX 14042, PEF 903

City: ST. PETERSBURG

State: FL Zip: 33733 - 4042

Phone: (727) 820-5295 Ext: Fax: (727) 820-5229

Email: dave.meyer@pgnmail.com

Ready Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008

Fig. 6: Screenshot of Section D (Cont 2) in Facility Form, facility contact.

File Edit EAOR Window Help

Go To Emissions Unit Form Save Exit

Section A and B Section B (Cont) Section B (Cont) and C Section D Section D (Cont) Section D (Cont 2) Attachments

ATTACHED SUPPLEMENTAL DATA

Please click on the Add button below to add Supplemental Data as an attachment to this AOR. Press the F1 key for more information on Attaching Supplemental Data.

Attachment Name	Attachment Description	Insert Date
Complex AOR RY 2010 Attachment	Sea Ray Boats - Complex Air Emission Calculations RY 2010	1/29/2011

WARNING: Changes to this attachment must be made using the View/Edit Button, or by double-clicking the Attachment Name.

Add View/Edit Remove

Ready Edit: DEP Revised AOR Data 2010 Ref: Local ARMS Data 2008

Fig. 7: Screenshot of Attachments Section in Facility Form.

3.5 Facility Form: Section D, D (Cont), D (Cont 2), Attachments

D. OWNER/CONTACT INFORMATION

1. **Owner or Authorized Representative** - Enter all the information requested for the facility's individual owner or for the representative authorized to sign this report for the facility's corporate or governmental owner. In the case of a non-Title V source, this is typically the person to whom the department will direct correspondence related to air pollutant emissions units at the facility. In the case of a Title V source, it is not necessary that this person be a responsible official, but the person must be authorized by the owner or operator of the facility to sign this report. Please provide the nine-digit postal zip code.
2. **Report Contact** - Enter all the information requested for the person to be contacted regarding this annual operating report. If the owner or operator used a consultant to complete this report and has no objection to the department contacting the consultant directly, this person may be that consultant. If this field is left blank, the department will contact the owner or authorized representative identified in Field 1 regarding any questions related to this report.

3. **Facility Contact** - Enter all the information requested for the person to be contacted regarding day-to-day operations of air pollutant emissions units at the facility. This is typically, but not necessarily, a person stationed at or in close proximity to the facility, such as the plant manager or environmental coordinator. This is the person the department will contact for access to the facility to conduct compliance inspections or observe stack tests.

E. OWNER OR AUTHORIZED REPRESENTATIVE STATEMENT

This statement should be signed by the owner or authorized representative named in Field 1 of Subsection I.D. of the form.

Resources

(See following pages.)

EU ID	EU Description	User Defined
002	NO. 4 STEAM BOILER	☐
003	NO. 5 STEAM BOILER	☐
005	DUCT BURNER SYSTEM ASSOCIATED WITH HRSG	☐
007	NEW LM6000PC-ESPRINT COMBUSTION TURBINE	☐

Fig. 8: Screenshot of the Select EU page in Emissions Unit Report.

3.6 Emissions Unit Form: Select EU

II. EMISSIONS UNIT REPORT

A separate Section II of the form (Emissions Unit Report) must be completed for each emissions unit at the facility, except emissions units at non-Title V sources that are exempt from permitting pursuant to Rule 62-4.040 or 62-210.300(3), F.A.C., insignificant emissions units at Title V sources, and units for which emissions reporting is not practical such as units that emit only radionuclides or units that emit only fugitive emissions that are not reasonably quantifiable. Units for which emissions reporting is not required will not appear on the EAOR or prefilled hardcopy of the AOR form. Note: this section of the form must be completed for all “unregulated” emissions units, as defined in the instructions to DEP form number 62-210.900(1), except any such units for which emissions reporting is not practical as set forth above.

An Emissions Unit Report must be completed for any reportable emissions unit that had active status during any part of the reporting year, even if it was permanently shut down during the year. If a reportable emissions unit operated during the reporting year but had no reportable emissions

(i.e., no pollutants subject to emission limiting standards and no pollutants emitted at or above threshold levels), only Subsections II.A. through II.E.(1) must be completed.

The most appropriate breakdown of process and production operations, and other pollutant-emitting activities, at a facility into separate emissions units is normally determined through the permitting process and, once established, shall be adhered to in completing this report. Permitting offices may establish separate “emissions units” solely for the purpose of reporting emissions on the annual operating report, especially fugitive emissions. For example, an emissions unit may be defined as representing facility-wide fugitive emissions resulting from equipment leaks or maintenance painting. Similarly, an emissions unit may be defined as representing those emissions that escape capture by a primary emissions unit’s vent hood and are released directly to the atmosphere without passing through the primary unit’s control equipment. Any questions regarding the manner in which emissions units have been defined by the department should be discussed with the appropriate permitting office.

In the case of a relocatable facility which operated at more than one site during the reporting year, one Section II of the form should be completed for the total operation, for each emissions unit.

Resources

(See following pages.)

3.6 FAQ: Unregulated vs. Insignificant

From: Holtom, Jonathan
Sent: Friday, October 09, 2009 11:22 AM
To: Vielhauer, Trina; DeAngelo, Gregory
Subject: RE: AOR

All unregulated emissions units are required to report periodically on the AOR, therefore, they are given an emissions unit ID number in order to capture the data in ARMS. For tank emissions to be greater than the insignificant levels listed in Rule 62-213.430(6), it would have to be a pretty large tank with many turnovers throughout the year. They are supposed to do the potential emissions calculations when preparing the applications and provide us with a listing of which units are insignificant and which need to be listed as unregulated. So, if they gave it to as unregulated, we assigned an EU number and they must address it on their AOR. If the applicant can demonstrate to us that the tank in question truly qualifies as an Insignificant source, we can change the Title V permit at the next opportunity.

Jon Holtom, P.E., CPM
Title V Program Administrator
Bureau of Air Regulation
(850) 921-9531

From: Vielhauer, Trina
Sent: Friday, October 09, 2009 11:01 AM
To: DeAngelo, Gregory
Cc: Holtom, Jonathan
Subject: AOR

Question for you (so I understand):

We have listed some storage tanks in a TV permit with an EU # in the unregulated section. The applicant is saying they don't want an EU # on these tanks (they didn't have an EU # before) because it "requires consideration and effort for calculating emissions in the AOR." I'm just trying to understand how the EU# makes a difference since they are still unregulated with or without a #.

Here's what the AOR instructions say:

Note: this section of the form must be completed for all "unregulated" emissions units, as defined in the instructions to DEP form number 62-210.900(1), except any such units for which emissions reporting is not practical as set forth above.

Just so I understand- is it really just adding the EU# that makes the difference on AOR reporting?

The screenshot displays the 'Emissions Unit Report' software interface. At the top, there is a menu bar with 'File', 'Edit', 'EAOR', 'Window', and 'Help'. Below the menu bar is a toolbar with various icons. The main window is divided into two panes. The left pane is titled 'DEP Revised AOR Data 2009' and the right pane is titled 'Local ARMS Data 2008'. Both panes show 'Section A' with the following fields:

- 1. Emissions Unit Description:** A text box containing 'NO.4 STEAM BOILER'.
- 2. Emissions Unit ID:** A text box containing '002'.
- 3. Emissions Unit Classification:** A dropdown menu set to 'Regulated Emissions Unit'.
- 4. Operated During Year?:** Radio buttons for 'Yes' (selected) and 'No'.
- 5. DEP Permit or PPS Number:** Two text boxes, one for 'Permit Number' and one for 'PPS Number', both containing an asterisk (*).
- Date Received:** A date picker set to '3/30/2010'.
- Date Reviewed:** A date picker set to '6/7/2010'.

The right pane (2008 data) has similar fields, but the 'Date Received' is '4/30/2009 12:00:00 A' and the 'Date Reviewed' is '5/26/2009 12:00:00 A'. At the bottom of the window, there is a status bar with 'Ready' on the left and 'Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008' on the right.

Fig. 9: Screenshot of Section A in Emissions Unit Report, emissions unit information.

3.7 Emissions Unit Form: Section A

A. EMISSIONS UNIT INFORMATION

- Emissions Unit Description** - Enter a brief description of the emissions unit addressed in this Emissions Unit Report (i.e., on this Section II of the annual operating report package). Include any unit designations and other information helpful in describing the emissions unit and differentiating it from other emissions units at the facility.
- Emissions Unit ID** - If known, enter the DEP three-digit emissions unit identification number assigned by the department to the emissions unit addressed in this report.
- Emissions Unit Classification (DEP Use)**
- Operated During Year?** - Enter a "Y" if the emissions unit operated during any part of the reporting year (January 1 - December 31); a "N" if it did not. If the emissions unit did not operate, the remaining subsections of the Emissions Unit Report need not be completed.

5. **DEP Permit or PPS Number** - Enter the current DEP air permit number or power plant site certification number applicable to the emissions unit addressed in this report.

Note: In some cases, each emissions unit has a separate permit. Often, however, a single permit addresses more than one emissions unit (e.g., a Title V operation permit). In such case, a separate Emissions Unit Report (Section II) is required for each emissions unit covered by the single permit.

Resources

(See following pages.)

The screenshot displays the EAOR Form software interface. At the top, there is a menu bar with 'File', 'Edit', 'EAOR', 'Window', and 'Help'. Below the menu bar is a toolbar with various icons. The main window is divided into two panes. The left pane is titled 'DEP Revised AOR Data 2009' and the right pane is titled 'Local ARMS Data 2008'. Both panes show 'Section A (Cont) and B'. Section A (Cont) includes fields for 'Emissions Unit Status' (set to 'ACTIVE'), 'Emissions Unit Startup Date' (set to '1/1/1976'), 'Long-term Reserve Shutdown Date', and 'Permanent Shutdown Date'. Section B includes fields for 'Emissions Point Type' (set to 'SINGLE POINT SERVING A SINGLE EMISSIONS UNIT') and 'Description of Control Equipment'. The bottom status bar shows 'Ready', 'Edit: DEP Revised AOR Data', '2009', 'Ref: Local ARMS Data', and '2008'.

Fig. 10: Screenshot of Section A (Cont) and B in Emissions Unit Report, emissions unit information continued and emission point/control information.

3.8 Emissions Unit Form: Section A (Cont) and B

A. EMISSIONS UNIT INFORMATION (Cont)

6. **Emissions Unit Status** - Enter, from the list below, the emissions unit status code valid as of December 31 of the reporting year:

<u>Code</u>	<u>Status</u>
A	Active - Emissions unit in operation, on standby status, temporarily shut down (including any shutdown while undergoing modification), or on long-term reserve shutdown. This code indicates an existing emissions unit which has not been permanently shut down, though it may not be operating at the time of this report.
C	Construction - Emissions unit in planning stage or undergoing initial construction; including reconstruction. This code indicates a proposed new

emissions unit, or an existing emissions unit which has been or will be shut down in its entirety for reconstruction.

- I Inactive - Emissions unit permanently shut down; permit surrendered or expired.
7. **Emissions Unit Startup Date** - If, during the reporting year, the emissions unit commenced operation following construction or reconstruction, enter the startup date. Do not enter, as a startup date, the date on which the emissions unit resumed operations following a temporary shutdown, such as a long-term reserve shutdown. If the emissions unit commenced operation prior to the reporting year but the startup date is missing, enter the startup date, if known.
 8. **Long-term Reserve Shutdown Date** - If the emissions unit has been placed on long-term reserve shutdown, enter the shutdown date. Do not enter, as a long-term reserve shutdown date, the date on which an emissions unit ceased operations for a planned temporary shutdown period or unplanned outage.
 9. **Permanent Shutdown Date** - If during the reporting year the emissions unit ceased operation, other than for an expected temporary period, enter the shutdown date.

B. EMISSION POINT/CONTROL INFORMATION

1. **Emission Point Type** - An emission point is a stack, vent, or other identifiable location at which air pollutants are discharged into the atmosphere. The emissions unit addressed in this Emissions Unit Report may have a single emission point, share an emission point with one or more other emissions units, have multiple emission points, or have no true emission point (e.g., an emissions unit with fugitive emissions only). Enter, from the list below, the type of emission point associated with the emissions unit.

<u>Type</u>	<u>Description of Emission Point</u>
1	A single emission point serving a single emissions unit (e.g., a single stack serving a single boiler). The emission point is not shared with another emissions unit, nor does the emissions unit have other emission points.
2	An emission point serving two or more emissions units capable of simultaneous operation (e.g., a single stack serving two boilers).
3	A configuration of multiple emission points serving a single emissions unit (e.g., a series of building vents serving a single enclosed process operation, a group of exhaust stacks serving a collectively-regulated bank of combustion turbines, or a collection of roof vents serving a collectively-regulated group of volatile organic liquid storage tanks).
4	No true emission point (e.g., fugitive emissions from a coal pile or equipment leaks)

2. **Description of Control Equipment** - Enter a brief description of each emission control device or system associated with the emissions unit addressed in this report (e.g., centrifugal wet scrubber, type N roto-clone, etc.). If not applicable, leave blank.

Resources

(See following pages.)

3.8 FAQ: Control Efficiency in Permit vs. EAOR

From: DeAngelo, Gregory
Sent: Friday, June 04, 2010 10:32 AM
To: Parmer, Cadedra
Cc: DeAngelo, Gregory
Subject: RE: Control Efficiency in EAOR

My recommendation:

Put control efficiency back in, and make sure comment says something like "The facility's calculations assume the indicated control efficiency; control efficiency is listed in AOR as per instructions." so that SWPN hopefully won't change it back next year, and discuss this issue on the next teleconference.

~ Greg D.

From: Parmer, Cadedra
Sent: Wednesday, June 02, 2010 4:07 PM
To: DeAngelo, Gregory; Zhu, Yi
Subject: Control Efficiency in EAOR

Hi, all-

Since we now submit this data to the NEI, I am a bit more attentive to this data now. For facility ID 1030216, SWPN removed the control efficiency the facility reported in EU1 and entered a comment stating "...is not specified in the permit. Scrubber not tested for actual removal efficiency." However, the control efficiency was taken into account in the annual emissions calculation and the F1 help in EAOR states "If a control efficiency is assumed in the calculation of emissions of this pollutant, enter the total assumed collection efficiency of the control equipment (primary and secondary) in percent by weight."

I am thinking that in this case, the control efficiency should be replaced. What are your thoughts?

Thanks,
Cadedra

The screenshot displays the Emissions Unit Report software interface. At the top, there is a menu bar with 'File', 'Edit', 'EAOR', 'Window', and 'Help'. Below the menu bar is a toolbar with various icons. The main window is divided into two panes. The left pane is titled 'DEP Revised AOR Data 2009' and the right pane is titled 'Local ARMS Data 2008'. Both panes show 'Section C. OPERATING SCHEDULE INFORMATION' and 'Section D. EMISSIONS UNIT COMMENT'. The left pane has a 'Select EU' dropdown set to '002' and navigation buttons '<< First', '< Previous', 'Next >', and 'Last >>'. The right pane has a 'Save' and 'Exit' button. The 'Section C' data is as follows:

Field	DEP Revised AOR Data 2009	Local ARMS Data 2008
1. Average Annual Operation: hours/day	21	23
1. Average Annual Operation: days/week	6	7
2. Total Operation During Year (hours/year)	7484	8493
3. Percent Hours of Operation by Season: DJF	29	26
3. Percent Hours of Operation by Season: MAM	20	26
3. Percent Hours of Operation by Season: JJA	30	22
3. Percent Hours of Operation by Season: SON	21	26
4. Average Summer Season Operation (June 1 to August 31): hours/day	21	23
4. Average Summer Season Operation (June 1 to August 31): days/week	7	6
4. Average Summer Season Operation (June 1 to August 31): SAF		
5. Total Operation During Summer Season (days/season)	92	92

The 'Section D. EMISSIONS UNIT COMMENT' field is a large text area at the bottom of each pane. The status bar at the bottom shows 'Ready' on the left, 'Edit: DEP Revised AOR Data' in the middle, and '2009 Ref: Local ARMS Data 2008' on the right.

Fig. 11: Screenshot of Section C and D in Emissions Unit Report, operating schedule information.

3.9 Emissions Unit Form: Section C and D

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. **Average Annual Operation** - Enter the average number of hours per day (to the nearest hour) and days per week that the emissions unit operated during the year. The average number of hours per day may be determined by dividing the total hours of operation (Field 2) by the number of days during which the emissions unit operated for at least one hour. The average number of days per week may be determined by dividing the total number of days during which the emissions unit operated (for at least one hour) by the number of weeks during which the emissions unit operated for at least one hour. If data are not available to compute these averages, "typical" values may be used. For example, if the emissions unit normally operated one shift per day, Monday through Friday, enter "8" hours per day and "5" days per week. If the emissions unit did not operate according to a typical schedule; e.g., a power generator operated as a "peaking" unit, enter the maximum hours per day and days per week that the emissions unit operated during the year.

2. **Total Operation During Year** - Enter the total number of hours per year that the emissions unit operated.
3. **Percent Hours of Operation by Season** - Enter, to the nearest whole percent, the percent of the total hours operated during the 12-month period, December 1 through November 30, for each three-month meteorological season. The total for all seasons must equal 100%.

Note: The DJF "season" should be reported as December of the year prior to the reporting year plus January and February of the reporting year.
4. **Average Summer Season Operation** - If the unit emits nitrogen oxides or volatile organic compounds, enter the average or typical number of hours per day (to the nearest hour) and days per week that the emissions unit operated during the summer season (June 1 through August 31).
5. **Total Operation During Summer Season** - If the unit emits nitrogen oxides or volatile organic compounds, enter the total number of days that the emissions unit operated during the summer season (June 1 through August 31).

D. EMISSIONS UNIT COMMENT

Enter any comments about the emissions unit addressed in this Emissions Unit Report, including any comments helpful in explaining any information entered or updated on this report.

Resources

(See following pages.)

3.9 FAQ: Percent Hours Operation

From: Zhu, Yi

Sent: Wednesday, December 09, 2009 12:59 PM

To: DeAngelo, Gregory; Parmer, Cadedra; Lanh, Kris

Cc: DeAngelo, Gregory

Subject: RE: question on % operation

EAOR (and ARMS I think) requires the total to be 100%. So you need to adjust the numbers a little bit. Keep in mind that they are not very accurate anyway. It is a way to look at seasonal changes. But emissions may not correspond directly to hours of operation.

-----Original Message-----

From: DeAngelo, Gregory

Sent: Wed 12/9/2009 11:41 AM

To: Parmer, Cadedra; Lanh, Kris

Cc: Zhu, Yi; DeAngelo, Gregory

Subject: RE: question on % operation

I would say DJF = 18%, MAM = 27%, JJA = 27%, SON = 27% (unless you're trying to correct for the number of days in each month being different).

		Hours/month	Hours/year	Hours/reporting year	Hours/period	% Operation by Period
2008	D	0				
2009	J	730				
2009	F	730			1460	18%
2009	M	730				
2009	A	730				
2009	M	730			2190	27%
2009	J	730				
2009	J	730				
2009	A	730			2190	27%
2009	S	730				
2009	O	730				
2009	N	730		8030	2190	27%
2009	D	730	8760			
2010	J	730				
2010	F	730				
2010	M	730				
2010	A	730				
2010	M	730				
2010	J	730				
2010	J	730				
2010	A	730				
2010	S	730				
2010	O	730				
2010	N	730				
2011	D	730	8760			

From: Parmer, Cadedra
Sent: Wednesday, December 09, 2009 11:28 AM
To: Lanh, Kris
Cc: DeAngelo, Gregory; Zhu, Yi
Subject: RE: question on % operation

I think I would say DJF = 16% and SON= 28% instead.

From: Lanh, Kris
Sent: Wednesday, December 09, 2009 11:11 AM
To: Parmer, Cadedra
Cc: DeAngelo, Gregory; Zhu, Yi
Subject: question on % operation

A unit commences operation on Jan 1, 09 to Dec 31, 09 continuously, the percent hours of operation would be:

DJF = 17%, MAM = 28%, JJA = 28% , SON = 27%

Is this correct?

Kris.

Select SCC	User Defined	SCC Unit	Description 1	Description 2	Description 3	Description 4
10300501	☐	1000 Gallons Distillate Oil	External Combustion Boilers	Commercial/Institutional	Distillate Oil	Grades 1 and 2 Oil
10300602	☐	Million Cubic Feet Natural Gas	External Combustion Boilers	Commercial/Institutional	Natural Gas	10-100 Million Btu/hr
*	☐					

Fig. 12: Screenshot of Section E in Emissions Unit Report, select SCC.

3.10 Emissions Unit Form: Section E

E. EMISSIONS INFORMATION BY PROCESS/FUEL

This section of the form provides information on the emissions associated with each of the raw materials, processes, fuels, stored volatile organic liquids (VOL), products and other permitted activities associated with the emissions unit addressed on this Emissions Unit Report. The information is provided in a format consistent with the EPA Source Classification Code (SCC) system. The SCC system is a method of encoding the component raw material, process, fuel usage, and production rates needed to compute pollutant emission rates using the EPA publication "Compilation of Air Pollutant Emission Factors (AP-42)," and other similar references. Source Classification Codes and emission factor listings are found in the Factor Information Retrieval (FIRE) system available from the EPA Technology Transfer Network (TTN) website: www.epa.gov/ttn/chief/efpac/index.html.

A separate Subsection II.E. of the form must be completed for each process or fuel usage (i.e., for each SCC) which contributes to emissions of any pollutant required to be reported. For example, if the emissions unit addressed on this Emissions Unit Report has three SCCs, all of

which have non-zero emission factors for one or more reportable pollutants, three Subsection II.E.'s should be completed.

Note: Where multiple SCC's are involved, it may not be possible to calculate the emissions of every pollutant for each SCC separately. For example, some of the emissions factors for units such as kilns are based on the combined emissions from both the process itself and the in-process fuel that is used. In such case, the total emissions from the emissions unit should be reported for the principal SCC (e.g., the process SCC for a kiln), and an explanatory note should be provided in the Emissions Calculation field.

Resources

(See following pages.)

3.10 FAQ: Invalid SCC

From: DeAngelo, Gregory
Sent: Monday, July 06, 2009 12:58 PM
To: Parmer, Cadedra
Cc: DeAngelo, Gregory
Subject: RE: Facility ID 0730099 - ADMIN REVIEW

As per the facility's attached cover letter, they are opting to not report emissions associated with traffic on unpaved roads and fugitive dust emissions because the Title V permit does not require them to report these emissions. Ignoring, for now, whether this argument is valid, to convey this, I guess the facility should have just marked these two SCC as invalid instead of reporting zero process rates. Zero process rates doesn't make much sense; clearly they had some level of fugitive dust and of unpaved road traffic.

I do not agree with the facility's claim that because there is no specific reporting requirement in the Title V permit for unpaved road and fugitive dust reporting, the facility is exempt from reporting unpaved road and fugitive dust emissions on the AOR. The Title V permit requires an AOR; the AOR requires reporting for each pollutant, for each SCC, where the pollutant is emitted from the emissions unit during the reporting year in an amount, by SCC, equal to or greater than the threshold. So, if unpaved road emissions of PM2.5 are 5.0 tons or more, than they have to report unpaved road PM2.5. If fugitive dust emissions of PM2.5 are 5.0 tons or more, than they have to report fugitive dust PM2.5.

They would also, in this case, have to report the process rate for the unpaved road SCC and the fugitive dust SCC.

But, the facility is claiming that PM2.5 is below threshold for unpaved roads SCC and for fugitive dust SCC. In this case, I don't see where they are obligated to report process rate. We've addressed this before, and maybe we need to get Yi to weigh in, but the instructions are pretty clear to me: "A separate Subsection II.E or the form must be completed for each process or fuel usage (i.e., for each SCC) which contributes to emissions of any pollutant required to be reported." So, if the unpaved road SCC is less than 5 tpy PM2.5, then they don't have to report PM2.5 and they don't have to report process rate. Same thing for fugitive dust. So I think the facility AOR is okay, but I disagree with their reasoning.

To code this correctly in AOR, I think making these two SCC invalid is probably the cleanest thing to do.

~ Greg D.

Greg DeAngelo
DARM // Office of Policy Analysis
and Program Management

Gregory.DeAngelo@dep.state.fl.us

(850) 921-9548 [phone](#)

(850) 922-6979 [fax](#)

From: Parmer, Cadedra

Sent: Monday, July 06, 2009 9:04 AM

To: DeAngelo, Gregory

Subject: Facility ID 0730099 - ADMIN REVIEW

Importance: High

Greg,

Please see my comments in 2008upload for this facility and please advise. This is a facility reviewed by Kris. Thanks.

Cadedra Parmer Hodge

Environmental Specialist

Florida Department of Environmental Protection

Division of Air Resource Management

Phone: (850) 921-9590

Go To Facility Form Select EU: 002 << First < Previous Next > Last >> Save Exit

DEP Revised AOR Data 2009 Local ARMS Data 2008 Save This Data

Select EU Section A Section A (Cont.) and B Section C and D Section E

Select SCC SCC & Pollutants Horizontal View Delete Pollutant

(1) PROCESS/FUEL INFORMATION

Select SCC	SCC Comment	User Defined	Invalid	SCC Unit	Annual Fuel Use
10300501	ALSO SEE	☐	☐	1000	

(2) EMISSIONS INFORMATION

Pollutant	User Defined	Invalid for All SCC	Not Emitted for Current SCC	Below Threshold
CO	☐	☐	☐	☐
HAPS	☐	☐	☐	☐
* NOX	☐	☐	☐	☐
PB	☐	☐	☐	☐
PM	☐	☐	☐	☐
PM10	☐	☐	☐	☐
* SO2	☐	☐	☐	☐
VOC	☐	☐	☐	☐

Ready Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008

Fig. 13: Screenshot of Section E on Emissions Unit Report, SCC & pollutants.

3.11 Emissions Unit Form: SCC & Pollutants, (1) Process/Fuel Information

(1) PROCESS/FUEL INFORMATION

For each SCC (i.e., for each Subsection II.E.), Fields 1-8 of Subsection II.E.(1), as applicable, should be completed, and for each reportable pollutant associated with the SCC, Fields 1-5 of Subsection II.E.(2), as applicable, should be completed. For example, if an emissions unit emits PM₁₀, PM_{2.5}, sulfur dioxide, nitrogen oxides, carbon monoxide, and volatile organic compounds in reportable amounts, a set of Fields 1, 2, 4, and 5 of Subsection II.E.(2) should be completed for each of those six pollutants associated with the SCC addressed in Subsection II.E.(1), and Field 3 of Subsection II.E.(2) should also be completed for nitrogen oxides and volatile organic compounds.

1. **Source Classification Code (DEP Use)**
2. **Description of Process or Type of Fuel** - Enter a description of the type of material handling, process, fuel burning, or production operation that is addressed in this Subsection II.E. of the

form, keeping in mind that separate Subsection II.E.'s are required for each permitted operation or activity (i.e., each SCC) to which emission factors are related. Use component breakdowns consistent with those used in AP-42 and the EPA SCC system. Taking the example of a cement production kiln, two processes to which emissions are related are the cement kiln itself (where emissions are related to tons of cement produced) and the coal burned in the cement kiln as in-process fuel (where emissions are related to tons burned). Each should be listed in a separate Subsection II.E. Another example is a boiler which burns both fuel oil and natural gas. The two listings would be for the oil used in the boiler (where emissions are related to thousand gallons burned) and natural gas used in boiler (where emissions are related to million cubic feet burned). The prefilled description corresponds to the SCC in Field 1. If the description appears applicable, report data in Fields 3-8 as required. If an alternative or additional description is needed, enter it on a blank Field 2. Any usage of used oil (on-spec or off-spec) should be specifically listed with rates reported in Fields 3 and 4. Entry of at least one process or fuel type is required for each emissions unit.

3. **Annual Process or Fuel Usage Rate** - Enter the annual process, fuel, or raw material usage rate corresponding to the process or fuel type identified in Field 2. The units must correspond to those used in the SCC system (Field 5).
4. **Summer Season Daily Process or Fuel Usage Rate** - If the unit emits nitrogen oxides or volatile organic compounds, enter the average or typical summer season (June 1 through August 31) daily process, fuel, or raw material usage rate corresponding to the process or fuel type identified in Field 2. The units must correspond to those used in the SCC system (Field 5). If the daily process or fuel usage rate is zero for this particular SCC during the summer season, enter zero.
5. **SCC Unit** - Enter the applicable SCC unit of measurement for the annual and summer-season daily SCC rate information given in Fields 3 and 4. If not using a prefilled report, contact the Department to ensure use of the proper SCC unit.
6. **Fuel Average % Sulfur** - If the SCC relates to combustion of coal, oil, process gas, or LPG, enter on a weight-percent basis the average fuel sulfur content used during the year, to the nearest 0.01 percent.
7. **Fuel Average % Ash** - If the SCC relates to combustion of coal, enter on a weight-percent basis the average fuel ash content used during the year, to the nearest 0.1 percent. If ash measurements are not available, a typical value is acceptable.
8. **Fuel Heat Content** - Enter the average as-fired heat content of the fuel used during the year in million Btu per ton (solid fuels), per thousand gallons (liquid fuels), or per million cubic feet (gaseous fuels). The fuel quantity unit should correspond to the SCC unit in Field 5. If heat content measurements are not available, a typical value is acceptable.

Resources

(See following pages.)

File Edit EAOR Window Help

Go To Facility Form Select EU 002 << First < Previous Next > Last >> Save Exit

DEP Revised AOR Data 2009 Local ARMS Data 2008

Select EU Section A Section A (Cont) and B Section C and D Section E

Select SCC SCC & Pollutants Horizontal View Delete Pollutant

(1) PROCESS/FUEL INFORMATION

Select SCC	SCC Comment	User Defined	Invalid	SCC Unit	Annual Fuel Use
10300501	ALSO SEE	☐	☐	1000	

(2) EMISSIONS INFORMATION

Pollutant	User Defined	Invalid for All SCC	Not Emitted for Current SCC	Below Threshold
CO	☐	☐	☐	☐
HAPS	☐	☐	☐	☐
* NOX	☐	☐	☐	☐
PB	☐	☐	☐	☐
PM	☐	☐	☐	☐
PM10	☐	☐	☐	☐
* SO2	☐	☐	☐	☐
VOC	☐	☐	☐	☐

Ready Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008

Fig. 14: Screenshot of Section E in Emissions Unit Report, SCC & pollutants.

3.12 Emissions Unit Form: SCC & Pollutants, (2) Emissions Information

(2) EMISSIONS INFORMATION

For the process or fuel type addressed in this Subsection II.E. of the form, Field 1 of Subsection II.E.(2) must be completed for each air pollutant listed on the EAOR or prefilled form and for any other pollutant which the emissions unit has the potential to emit in a reportable amount, even if the actual emissions for the reporting year were less than such amount. Fields 2-5, as applicable, should be completed for those air pollutants which were actually emitted in a reportable amount for the reporting year. Reportable emissions are defined as follows:

Pollutants Subject to Emission Limiting Standards:

For **any pollutant** that is subject to a numerical emission limiting standard, either by rule or permit condition, a set of Fields 2, 4 and 5 should be completed for each such pollutant, for each SCC, even if quantities are small. Field 3 should be completed only for NOX and VOC, and only where annual NOX or VOC emissions, respectively, are required to be reported in Field 2. 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 emission limiting standard for “any” hazardous air pollutant (HAP), without specifying a particular HAP, Fields 2, 4 and 5 should be completed for each HAP with emissions equal to or greater than 1000 pounds per year.

Pollutants Subject to Reporting Thresholds:

For criteria/precursor pollutants, individual hazardous air pollutants, and other pollutants as listed below that are emitted from the unit but **not** subject to any numerical emission limiting standards, a set of Fields 2, 4 and 5 should be completed for each such 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 below. Pollutants need not be reported for any SCC for which the emissions were less than the appropriate threshold. Field 3 should be completed only for NOX and VOC, and only where annual NOX or VOC emissions, respectively, are required to be reported in Field 2.

Criteria/Precursor Pollutants:

<u>Pollutant</u>	<u>Reporting Threshold by SCC</u>
PM10, PM2.5, SO2, NOX, NH3, VOC, and CO	5.0 tons/year
Condensable particulate matter (CPM)	5.0 tons/year
Lead or lead compounds expressed as lead (PB)	500 pounds/year

The above criteria/precursor pollutant reporting requirements apply annually to all emissions units and to all criteria/precursor pollutants emitted from such units.

Note: Condensable particulate matter emissions need to be reported only if information is available to estimate emissions. If such information is not available, CPM should not be listed as a reportable pollutant on the form.

Hazardous Air Pollutants (HAPs):

<u>Pollutant</u>	<u>Reporting Threshold by SCC</u>
Each HAP as defined below	1000 pounds/year

This requirement applies to each HAP emitted at or above the threshold if the facility is major for total hazardous air pollutants (HAPS). If the facility is not major for total hazardous air pollutants, it only applies to each HAP for which the facility is major. The requirement applies only for reporting year 2008 and at three-year intervals thereafter (e.g., for reporting years 2011, 2014, etc.).

Other Air Pollutants:

<u>Pollutant</u>	<u>Reporting Threshold by SCC</u>
t-butyl acetate (TBAC)	5.0 tons/year

TBAC emissions should not be included in VOC emissions, but must be reported separately on an annual basis.

1. **Pollutant** - Enter the name or identification code (as listed above or in Appendix A) of the pollutant addressed on this set of Fields 1-5 of the form. Pollutants that must be addressed include each air pollutant listed on the EAOR or prefilled form. If a pollutant is not listed on the EAOR or prefilled form but is subject to an emission limiting standard or has the potential to be emitted in a reportable amount (even if the actual emissions for the reporting year were less than such amount), it must be entered in this field and reported in accordance with the instructions for this subsection. If no estimate of annual pollutant emissions is given in Field 2, indicate the reason by checking one of the following:

Below Threshold - The emissions unit has the potential to emit the listed pollutant in an amount equal to or greater than the reporting threshold, but the actual emissions for the reporting year for the SCC (i.e., the process or fuel type) addressed on this Subsection II.E. of the form were less than the threshold.

Not Emitted - In the case of a prefilled pollutant, the emissions unit has the potential to emit the listed pollutant but not as a result of the SCC addressed on this Subsection II.E. of the form.

2. **Annual Emissions** - Enter, in tons per year, a best estimate of the actual quantity of the pollutant identified in corresponding Field 1 that was emitted by the emissions unit, for the SCC, during the reporting year. Compute emissions according to the requirements of Rule 62-210.370, F.A.C. (see Appendix B), using the highest ranked applicable method listed in Field 4. An alternative method may be used only if it has been demonstrated to be more accurate than all otherwise applicable higher ranked methods.

Accounting for Soot Blowing Emissions: To the extent quantifiable, include elevated emissions resulting from soot blowing operations, if applicable, in the annual emissions estimate.

Accounting for Startup and Shutdown Emissions: If emissions are determined using a CEMS, include in the annual emissions estimate those emissions measured during startup and

shutdown periods, even if no emission limitation applies during such periods. If startup and shutdown emissions are otherwise required by permit to be accounted for on an annual basis, compute such emissions according to the methodology specified by the permit, and include such emissions in the annual emissions estimate. For all other situations, include startup and shutdown emissions in the annual emissions estimate to the extent they can reasonably be quantified. For example, if a control efficiency is assumed in the emissions calculation, and the control device efficiency is known to be less during periods of startup or shutdown, emissions calculations for such periods should be adjusted accordingly. If emissions are inherently higher during startup or shutdown conditions, the annual emissions should reflect the cumulative effect of all startup and shutdown operations on emissions over the course of the year.

Accounting for Fugitive Emissions: If the emissions associated with a permitted emissions unit and SCC are entirely fugitive in nature, they must be reported, to the extent quantifiable, in the same manner as stack emissions (i.e., in accordance with the pollutant reporting criteria of Subsection II.E.(2)). If some of the emissions generated by the process are captured by a collection system and routed through control equipment, while the remainder of the emissions escape capture and are discharged as fugitive emissions, the fugitive component of the emissions should be reported as specified by the permitting office (e.g., by using a separate emissions unit established for such purpose). Fugitive particulate matter emissions resulting from vehicular movement or wind erosion need not be reported unless required by permit.

Documents from the EPA Emission Inventory Improvement Program (EIIP), available at <http://www.epa.gov/ttn/chief/eiip/index.html>, describe the emissions estimation procedures for many industries, and also provide guidance on how to incorporate the effects of control device efficiency variations into the emission estimates.

3. **Summer Season Daily Emissions** - If the pollutant is NOX or VOC, and the annual emissions are required to be reported in Field 2, enter the average or typical amount of the pollutant, for the SCC, emitted daily during the summer season (June 1 through August 31) in units of pounds per day. Show all calculations in Field 5 or on a separate sheet as required.
4. **Emissions Method Code** - Enter the code from the following list that best describes the method by which the actual emissions in Fields 2 and 3 were determined. The methods are listed in rank order of required use in accordance with Rule 62-210.370, F.A.C.

<u>Code</u>	<u>Description of Emission Method</u>
1A	This entry indicates that the emissions were determined based on emissions measurement using a continuous emissions monitoring system (CEMS).
2	This entry indicates that the emissions were calculated by the use of materials balance and knowledge of the process.

- | | |
|----|--|
| 3A | This entry indicates that the emissions were calculated using an emission factor based on site-specific data such as stack test data. |
| 3B | 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 | 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 | This entry indicates that the emissions were calculated using an emission factor other than one listed above. |
5. **Emissions Calculation** - Provide all calculations for the emissions reported in Fields 2 and 3, clearly showing how soot blowing, startup, shutdown, control efficiency, capture efficiency, and fugitive emissions, as applicable, are reflected in the reported totals. Use a separate sheet as needed. If the emissions during soot blowing or startup/shutdown periods are determined by a CEMS and included in the reported totals (please provide a statement confirming this), it is not necessary to provide separate calculations of soot blowing, startup, or shutdown emissions. If the emissions calculation methodology does not follow the Field 4 rank order of required use from Rule 62-210.370, F.A.C., provide a demonstration, as required by the rule, that the alternative approach is more accurate.

File Edit EAOR Window Help

Calculations for SCC - 10300501, Pollutant - CO

B17 =B4*B15/2000

	A	B	C	D	E
1	Average Annual Operation (Hours/Day)	21			
2	Average Annual Operation (Days/Week)	6			
3	Total Annual Operation (Hours/Year)	7484			
4	Annual Process or Fuel Usage Rate (1000 Gallons Distillate Oil (No. 1 & 2) Burned)	0.8			
5	Fuel Average % Sulfur	0.5			
6	Fuel Average % Ash				
7	Fuel Heat Content (mmBtu/1000 Gallons Distillate Oil (No. 1 & 2) Burned)	136			
8	Average Summer Season Operation (Hours/Day)	21			
9	Average Summer Season Operation (Days/Week)	7			
10	% Hours of Operation DJF	29			
11	% Hours of Operation MAM	20			
12	% Hours of Operation JJA	30			
13	% Hours of Operation SON	21			
14	Summer Season Daily Process or Fuel Usage Rate (1000 Gallons Distillate Oil (No. 1 & 2) Burned)	0.003			
15	Emission Factor (Lbs/1000 Gallons Distillate Oil (No. 1 & 2) Burned)	5			
16	Total Operation During Summer Season (Days/Season)	92			
17	Annual Emissions (Tons/Year)	0.002			
18	Summer Season Daily Emission (Lbs/Day)				
19	Emission Comments				
20					
21					
22					
23					

Show Calculation Show Comment Save Cancel Clear Sheet Import

Ready Edit: DEP Revised AOR Data 2009 Ref: Local ARMS Data 2008

Fig. 14: Screenshot of Section E in Emissions Unit Report, (2) Emissions Information, calculation worksheet.

Resources

(See following pages.)

3.12 FAQ: Emissions by SCC

From: Zhu, Yi

Sent: Tuesday, June 30, 2009 3:57 PM

To: DeAngelo, Gregory; Parmer, Cadedra

Subject: RE: Emissions by SCC

Greg,

Yes, it is required by EPA and it is how their system works. Years ago, our AOR form and database (APIS) only tracked emissions at EU level. We had to go through calculations to apportion the data before submitting to EPA. If you look at the AOR data in ARMS before 1994, you will find only emissions data at EU level. When ARMS was designed, we changed the structure to be consistent with EPA (we updated the AOR form a few years before that). 1994 AOR is the first year that data were entered at the SCC level. This may go back to the fact that most of the emissions are calculated by emission factors that are SCC based. It makes sense for most cases. For people who use CEMS and report all the emissions on the primary fuel, we have not said anything. But for people who do not use a fuel as the primary fuel, we always asked them to apportion the data which I agree it may not be very accurate – we use the term “estimate of actual emissions” in the AOR instructions. We also use “Not Emitted” to deal with in process fuels in the industrial processes (when emission factors for the process include the fuel usage). I hope this helps.

Yi

From: DeAngelo, Gregory

Sent: Tuesday, June 30, 2009 1:35 PM

To: Parmer, Cadedra; Zhu, Yi

Cc: DeAngelo, Gregory

Subject: Emissions by SCC

Yi,

Can you briefly explain the history behind asking for emissions by SCC? Is this something that EPA requires, or is it something that we have just always done this way? We're running into an issue with CEMS use; if we just take the annual CEMS totals, that is often for the entire EU. By forcing facility to report on the SCC level, they must do some sort of calculation to apportion the CEMS results, which might end up not being as accurate. I guess the EU total would still be the same, but the emissions per SCC might not be as meaningful. Anyway, I've been thinking about this for a few weeks now, and would like to know more about the origin of the requirement to report by SCC.

~ Greg D.

[Greg DeAngelo](#)

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and Program Management

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(850) 922-6979 [fax](#)

3.12 FAQ: CEMS Apportioning

From: DeAngelo, Gregory

Sent: Friday, June 04, 2010 10:13 AM

To: Parmer, Cadedra

Subject: RE: Apportioning CEMS Data

The AOR instructions require reporting of fuel use and emissions by SCC (which indicates that the reporting should be by fuel type). Please use engineering judgment to allocate the emissions by fuel type and resubmit the AOR. I have attached a sample calculation that may be useful for you to allocate CEMS data for NO_x and SO₂ emissions by fuel type, if you are unable to correlate hourly records of fuel use with your CEMS results. Feel free to contact me if you have questions or need further assistance. Thanks.

3.12 FAQ: Apportioning Emissions by SCC

From: DeAngelo, Gregory
Sent: Tuesday, June 30, 2009 1:28 PM
To: Parmer, Cadedra
Cc: DeAngelo, Gregory
Subject: RE: Facility 1210003 - ADMIN REVIEW

Our position: Many facilities, particularly those using CEMS to calculate the EU emissions, are aggregating pollutant emissions without regard to fuel type. For example, the facility might list all NOX under the No. 6 fuel oil SCC, and check "not emitted" for No. 2 fuel oil, natural gas, etc. This seems clearly contrary to the AOR instructions, which require reporting of fuel use and emissions by SCC (which indicates that emission reporting should be done by fuel type).

The complicating factor: our rules require CEMS to be used for emissions estimation, if CEMS meeting certain criteria are installed. These CEMS may or may not be programmed to provide emissions by fuel type. In other words, the CEMS might know hour-by-hour emissions, and the facility might track hour-by-hour fuel usage, but those could very well be different systems that do not talk to each other. So our rule requires CEMS, which gives an annual total, and our forms require emissions by fuel type, which must be back-calculated somehow from the CEMS total.

For an example of one way to do this, look at 1070014 (2008 EAOR). This facility calculated an aggregate lb NOX / mmBTU emission factor based (presumably) on the total lbs of NOX emitted over the year and the total amount of mmBTU fired (oil plus gas). Then they used this aggregate emission factor times mmBTU of oil fired for the oil SCC and the mmBTU of gas fired for the gas SCC. Seems like a logical solution.

For an example of just putting all the emissions into one SCC, look at 1210003 (2008 EAOR). This facility put all the SO2 emissions under one SCC and included a comment on all the other SCC.

(For this facility, to be consistent with our position, we should contact them and ask them to segregate by SCC. I might need to bring this up sooner than I thought...)

~ Greg D.

[Greg DeAngelo](#)
DARM // Office of Policy Analysis

From: Parmer, Cadedra
Sent: Tuesday, June 30, 2009 9:37 AM
To: DeAngelo, Gregory
Subject: Facility 1210003 - ADMIN REVIEW
Importance: High

Greg,
Please see my comments for item #2B for this facility in 2008upload. This is a facility reviewed by Kelly. Thanks.

Cadedra Parmer Hodge

3.12 FAQ: Stack Test Emission Factors

From: DeAngelo, Gregory
Sent: Thursday, February 25, 2010 5:07 PM
To: Lanh, Kris
Cc: Parmer, Cadedra; Zhu, Yi; DeAngelo, Gregory
Subject: RE: AOR question

I think you should always start the answer to questions like this with the following follow-up question: What do the rules (or instructions) say?

62-210.370(2)(a) lays out the hierarchy of emission calculation options (use CEMS; if no CEMS, use mass balance; if cannot do mass balance, do emission factor calculation).

62-210.370(2)(b) is how to do CEMS calculation.

62-210.370(2)(c) is how to do mass balance calculation.

62-210.370(2)(d) is how to do emission factor calculation; this is where it says to use an emission factor based on site-specific data if such a factor is available (use site-specific EF; if no site-specific EF, use "published" EF for that process; if no published EF for that process, use EF for a similar process).

So based on the limited information below, sounds like your answer is correct. If they have lead stack tests, they should use those stack tests to develop a site-specific emission factor instead of using an AP-42 emission factor. Unless (as per the rule) they can demonstrate that the AP-42 emission factor is more accurate.

~ Greg D.

From: Lanh, Kris
Sent: Thursday, February 25, 2010 3:57 PM
To: Parmer, Cadedra
Cc: DeAngelo, Gregory; Zhu, Yi
Subject: AOR question

Just like to share this question with everyone.

JEA asked. Should we use stack test EF for calculating Pb annual emissions for 2009? JEA had a one-time stack test for lead in 2008 which they used to calculate the 2008 emissions and is much more accurate than using the EPA AP42 EF.

My answer: NEDV should be the person making this decision; but in hind sight, using the 2008 stack test EF is the ok and yields a much more accurate annual emissions.

Thanks,

Kris.

3.12 FAQ: Combining Emission Factors

From: Lanh, Kris
Sent: Thursday, June 24, 2010 10:01:39 AM
To: Fulton, Lisa, kulmer@kooglerassociates.com
Cc: DeAngelo, Gregory; Lanh, Kris
Subject: RE: Facility 0250005 General Asphalt #1

Good morning Kyle

Please see comments from DEP regarding the AOR for General Asphalt (0250005). Please look into this and let me know ASAP

Thank you

Ray A. Gordon

Special Projects Administrator

Office:305-372-6925

gordor@miamidade.gov "Delivering
Excellence Every Day"

"Delivering Excellence Every Day"

From: Fulton, Lisa [mailto:Lisa.Fulton@dep.state.fl.us]
Sent: June 23, 2010 4:48 PM
To: Gordon, Ray (DERM)
Cc: DeAngelo, Gregory; Lanh, Kris
Subject: Facility 0250005 General Asphalt #1

Ray,

Good Afternoon. Could you look into this facility? The emissions are not properly reported for this facility.

Here are the following issues:

- 1) According to the permit, eu2 is the crusher, eu 3 is conveyor and hopper fugitive missions, and eu4 is fugitive emissions from screening. The facility used the total throughput with AP-42 emission factor (0.0024lbPM10/ton).
- 2) That particular emission factor should only be used for crushing.
- 3) PM and PM10 is under-reported as a result of not calculating emissions from conveyor and screening. These emission factors are different and are located in AP-42 section.
- 4) The permit specifies unique and separate EUs. It is not appropriate to use combined EF to calculate total PM from crushing, conveyor, hopper and screening in one SCC. If they want to report under one EU, the permit should be changed.

Thank you!

Lisa Fulton, Environmental Specialist

Division of Air Resource Management Florida Department of Environmental Protection 2600 Blair Stone Rd, MS
5500 Tallahassee, FL 32399-2400 Lisa.Fulton@dep.state.fl.us

3.12 FAQ: Emission Factor Detection Limits

From: DeAngelo, Gregory
Sent: Wednesday, June 17, 2009 3:28 PM
To: Parmer, Cadedra
Cc: Zhu, Yi; DeAngelo, Gregory
Subject: FW: detection limit issue

(EMC is EPA's emission measurement center)

Summary quote:

If the data are used to develop an emissions factor, half of the limit of detection is typically substituted for [below detection limit] BDL results. This is consistent with developing emissions factors to represent average emissions per unit of production across the industry category.

[Greg DeAngelo](#)
DARM // Office of Policy Analysis
and Program Management
Gregory.DeAngelo@dep.state.fl.us
(850) 921-9548 [phone](#)
(850) 922-6979 [fax](#)

From: Pichard, Errin
Sent: Wednesday, June 17, 2009 3:21 PM
To: DeAngelo, Gregory
Subject: detection limit issue

I guess this is what I was thinking of. Sounds like it depends on the specific use of the data (or lack thereof). Let me know if you need help.

How does the EMC view analytical lab results that indicate nondetectable or below the detection limit values?

Conceptually, the "limit of detection" is the smallest amount of a substance that an analytical method can reliably distinguish from zero. More formally, it is the minimum concentration or amount of a target analyte that produces a signal the tester can distinguish, at a specified confidence level, from the signal produced by a blank. Testers sometimes mistakenly use the term "limit of quantification" when they mean "limit of detection." The limit of quantification is the minimum concentration or amount of an analyte that a method can measure with a specified degree of precision. One procedure for calculating the limit of detection is to collect and analyze a series of at least seven blank or very low-level samples. The tester then calculates the standard deviation of the results. If the tester used seven samples multiplying the standard deviation by three will produce a limit of detection at roughly the 99% confidence level (please see NOTE below).

Each laboratory should report its limit of detection, identify its procedure for measuring the limit of detection, and label results below the detection limit as "below detection limit (BDL)." As the measured results approach the estimated limit of detection, it becomes critical for the tester to determine the limit of detection for each test program. The tester must report the experimentally measured limit of detection and the procedure used to measure it whether or not individual results are

above or below the detection limit. If the user averages results of samples from the same "test," where some results are BDL and other results are above the detection limit, then the user should substitute the estimated detection limit for the BDL results. The user should then report the average as "equal to or less than" the averaged result. If all results are BDL, the user should report the average as BDL also.

When designing a test program for a particular purpose, you should not use a method whose limit of detection will affect your decision. In other words, you should design the test program so substituting any value from zero through the limit of detection for BDL results will not affect the primary data user's ability to make decisions based on the data. If your test program uses methods that measure multiple pollutants, you must decide how to treat the results from all the potential targets of the test method that are not detected. Some methods designed to measure multiple pollutants can have many potential targets. Substituting a value other than zero for all potential measurement targets that are not detected may result in a total that exceeds regulatory limits even when the method has low limits of detection. No general guidance can address all the possibilities, so you must decide how to handle this on a case-by-case basis. In addition, when designing a test program, the data user and his tester may want to consider potential secondary uses of the data. Some examples of secondary uses are as inputs for risk assessments, for characterizing emissions by nonregulatory groups and for developing emission factors.

Using data gathered for other purposes or "secondary data" to support a decision may present special problems related to detection limits. The secondary data user may find published data sets where substituting a value from zero through the limit of detection for BDL values would affect the user's decision. The potential effect of the decision should dictate which value (zero through the detection limit) to substitute. This is best shown with examples. The examples are for illustrative purposes; they are not the only right ways to evaluate BDL data. In the end, the data user must decide what is the most suitable way to treat results reported as BDL.

If the data are used to perform a risk analysis for emissions from a particular facility, the value of the limit of detection could be substituted for any BDL results. This would give the highest (worst case) value for the emissions which would be protective of the public health. Some risk assessment evaluations use uncertainly estimations to produce probabilistic estimations of emissions.

If the data are used to develop an emissions factor, half of the limit of detection is typically substituted for BDL results. This is consistent with developing emissions factors to represent average emissions per unit of production across the industry category.

If the data are used to set emissions limits, different procedures may be used for different source categories. However, the procedure used to determine compliance with the emission limit should be consistent with the procedure used during testing to set the emission limit. For example, when measuring dioxin/furan emissions from municipal waste combustors, EPA substituted zero for BDL results during the testing to gather data to support the emission limit. To be consistent, the Agency allows testers to substitute zero for BDL results when determining compliance with the municipal waste combustor dioxin/furan emission limit provided the test run duration is four or more hours.

NOTE: This information was derived from the American Chemical Society Committee on Environmental Improvement, "Guidelines for Data Acquisition and Data Quality Evaluation in Environmental Chemistry"; *Analytical Chemistry* 1980, 52, pp.2242-2248.

3.12 FAQ: Condensable PM Emission Factors

From: Rogers, Tom
Sent: Wednesday, November 18, 2009 4:54 PM
To: Parmer, Cadedra; Lanh, Kris; DeAngelo, Gregory
Cc: Zhu, Yi
Subject: FW: Condensable PM Emission Factors for EGUs; update on SO2 emissions from coal-fired EGUs

FYI - Information on calculating condensable particulate matter (CPM) from EGU's.

Tom Rogers
Division of Air Resource Management
Florida Department of Environmental Protection
(850) 921-9554

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communication may therefore be subject to public disclosure.

From: Eagan, Tammy
Sent: Wednesday, November 18, 2009 3:28 PM
To: Vielhauer, Trina; George, Larry; Rogers, Tom
Subject: FW: Condensable PM Emission Factors for EGUs; update on SO2 emissions from coal-fired EGUs

If anyone can benefit from the following information, please share.

Happy William Tell Day,
Tammy

From: Amy Royden-Bloom [<mailto:aroyden-bloom@4cleanair.org>]
Sent: Wednesday, November 18, 2009 3:02 PM
To: Amy Royden-Bloom
Subject: Condensable PM Emission Factors for EGUs; update on SO2 emissions from coal-fired EGUs

TO NACAA CRITERIA POLLUTANTS COMMITTEE

1. As discussed on today's call, here is a link to MACTEC's memo to MARAMA, "Emissions Factors for Condensable Particulate Matter Emissions from Electric Generating Units"

http://airweb.timberlakepublishing.com/rc_files/4784/Emission_Factors_condensable_PM_EGUs.pdf

2. In addition, third quarter data (2009 versus 2008) are now available on EPA's interactive website tracking SO2 emissions from coal-fired EGUs.

The website is still at <http://www.epa.gov/airmarkets/quarterlytracking.html>

but EPA replaced the site interface to make it easier to use. EPA will also be rolling out videos that walk users through the use of the motion charts (similar to the webinar with NACAA)

Amy Royden-Bloom
Senior Staff Associate
National Association of Clean Air Agencies (NACAA)
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Washington, DC 20001
202-624-7864
aroyden-bloom@4cleanair.org

From: Bodnarik, Andy [<mailto:Andrew.Bodnarik@des.nh.gov>]
Sent: Wednesday, November 18, 2009 2:51 PM
To: Amy Royden-Bloom
Subject: Condensible PM Emission Factors for EGUs

Amy,

The attachment is the technical memo on condensible PM emission factors for EGUs prepared by MACTEC for MARAMA
Andy Bodnarik
Andrew M. Bodnarik
Regional & National Issues Manager
NH Department of Environmental Services
Air Resources Division
29 Hazen Drive
Concord, New Hampshire 03301

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e-mail: abodnarik@des.state.nh.us

3.12 FAQ: PM/PM10/PM2.5 – Filterable and Condensable

-----Original Message-----

From: Zhu, Yi
Sent: Thursday, December 31, 2009 3:19 PM
To: George, Larry
Cc: Parmer, Cadedra
Subject: RE: AOR

Yes. See factors below.

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine
POLLUTANT PM, condensable NEI PM-CON CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 4.700E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine
POLLUTANT PM, filterable NEI PM-FIL CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 1.900E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine
POLLUTANT PM, primary NEI PM-PRI CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 6.600E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine
POLLUTANT PM10, filterable NEI PM10-FIL CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 1.900E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine

POLLUTANT PM10, primary NEI PM10-PRI CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 6.600E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine
POLLUTANT PM2.5, filterable NEI PM25-FIL CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 1.900E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

SCC 20100201 Details
Internal Combustion Engines > Electric Generation > Natural Gas > Turbine
POLLUTANT PM2.5, primary NEI PM25-PRI CAS
Primary Control / Secondary Control : STEAM OR WATER INJECTION ,
Emission Factor -- 6.600E-3 Lb per Million Btus Fuel Input;
Quality -- C Emissions Factors Applicability

-----Original Message-----

From: George, Larry
Sent: Thursday, December 31, 2009 3:16 PM
To: Zhu, Yi
Subject: RE: AOR

Thanks, it's becoming clearer all the time--but is there such a thing as a filterable emission factor for PM2.5? If so, I like this answer better than mine.

-----Original Message-----

From: Zhu, Yi
Sent: Thursday, December 31, 2009 3:09 PM
To: George, Larry
Subject: FW: AOR

This is the email I was referring to.

-----Original Message-----

From: Zhu, Yi
Sent: Tuesday, March 10, 2009 1:51 PM
To: 'WenclaMD@obg.com'
Cc: Lanh, Kris; DeAngelo, Gregory; Rogers, Tom
Subject: RE: AOR

Mark,

It depends on the information you have and how you are calculating the emissions. Since you mentioned emission factors, I assume you are applying the emission factors from AP42 or FIRE. In

general, the emission factors listed as primary include filterable PM and condensable PM. Condensable PM is all PM_{2.5}. If you find an emission factor for condensable PM, report that as CPM for your AOR. Then report only the filterable part for PM, PM₁₀ and PM_{2.5} respectively. If the emission factor for condensable PM does not exist, then use the emission factor for the primary PM or filterable PM, depends on which is available. You should never add the emission factor for primary and filterable since primary already includes the filterable. Same principle applies to PM₁₀ and PM_{2.5}.

Please let me know if you have further questions. It may be easier for us to talk on the phone if you have a specific example. Thank you.

Yi Zhu
Division of Air Resources Management
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Florida 32399-2400
Phone: (850) 921-9558
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Email: yi.zhu@dep.state.fl.us

-----Original Message-----

From: Mark Wenclawiak [\[mailto:WenclaMD@obg.com\]](mailto:WenclaMD@obg.com)
Sent: Tuesday, March 10, 2009 7:46 AM
To: George, Larry; Rogers, Tom
Subject: AOR

Larry and Tom:

For PM/PM₁₀/PM_{2.5}: how should we represent the emission factors? That is, is PM = filterable + condensable, with a separate calculation for condensable? Or is PM = filterable. Is PM₁₀ = filterable + primary, or just primary? Same for PM_{2.5}. Thanks.

Mark Wenclawiak
O'Brien & Gere
5895 Shiloh Road, Suite 113
Alpharetta, GA 30005
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Fax: 770-205-9604
Cell: 770-378-9856
wenclamd@obg.com

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3.12 FAQ: HAPS Reporting

From: Zhu, Yi
Sent: Thursday, May 20, 2010 7:37 AM
To: DeAngelo, Gregory; Gordon, Ray (DERM)
Cc: Parmer, Cadedra
Subject: RE: HAPS reporting

I agree. But if there is only a limit for total HAP (no limit for any individual HAP, a rare case), only the total HAP is required to be reported annually. When they calculate the total HAP, all individual HAPs must be accounted, regardless the quantity. When we worked on the instructions last time, we discussed this with the toxic working group.

From: DeAngelo, Gregory
Sent: Wednesday, May 19, 2010 1:18 PM
To: Gordon, Ray (DERM)
Cc: Parmer, Cadedra; Zhu, Yi; DeAngelo, Gregory
Subject: RE: HAPS reporting

Ray, that looks like an emission limit to me. The condition B.7 is called "emission limit" and the actual language says to limit emissions to 0.26 kg / kg coating solids. It doesn't say to limit the HAP content or HAP usage like some other rules and permits for coating operations; the permit specifically says to limit the HAP emissions. But, it's not an emission limit on any specific HAP (actually, it limits just the organic HAP emissions, so there is arguably no limit on metals HAP emissions).

Anyway, I think this language from the AOR form instructions was probably intended to apply to your situation: If the permit contains a numerical emission limiting standard for 'any' hazardous air pollutant (HAP), without specifying a particular HAP, Fields 2, 4 and 5 should be completed for each HAP with emissions equal to or greater than 1000 pounds per year.

I also think the language intends that total HAP is required to be reported in the case of an emission limit for total HAP, just like an individual HAP is required to be reported if there is an emission limit for an individual HAP. But if there is only an emission limit for total HAP, you must report total HAP as well as any individual HAP that is 1000 lbs/yr or more.

I've copied Yi to double-check, as Cadedra is out of the office this week. And again, as a caveat, I have not read the rest of this permit or looked at the specific NESHAP in question.

~ Greg D.

From: Gordon, Ray (DERM) [<mailto:GordoR@miamidade.gov>]
Sent: Wednesday, May 19, 2010 1:04 PM
To: DeAngelo, Gregory
Subject: RE: HAPS reporting

Hi Greg

Would this condition be considered a limit for HAPS, therefore requiring the facility to report HAP emissions on their AOR?

B.7 Emission Limit: The permittee must limit organic HAP emissions to the atmosphere from the facility to the applicable limit specified in parts (1) through (4) of this condition, except as specified in 40 CFR 63.4490 (c), determined according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551 or 40 CFR 63.4561.

(1) Reserved

(2) Reserved.

(3) For each existing TPO coating affected source, limit organic HAP emissions to no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

(4) Reserved

[40 CFR 63.4490 (b)]

Ray A. Gordon

Special Projects Administrator

Office: 305-372-6925

gordor@miamidade.gov

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From: DeAngelo, Gregory [<mailto:Gregory.DeAngelo@dep.state.fl.us>]
Sent: May 12, 2010 3:55 PM
To: Parmer, Cadedra; Gordon, Ray (DERM)
Cc: DeAngelo, Gregory
Subject: RE: HAPS reporting

Ray,

Short answer: No, not true. Their consultant is wrong.

Long answer:

Every third year (2008, 2011, 2014, etc.) is a "HAP reporting year." In a HAP reporting year, each HAP emitted at 1000 lbs/yr or more must be reported, regardless of whether there is an associated emission limit for that HAP, if the facility is major for total HAP (i.e., PTE of 25 tons or more of total HAP). If the facility is not major for total HAP, then in the HAP reporting year, the facility is only required to report each HAP emitted at 1000 lbs/yr or more if the facility is major for that HAP (i.e., PTE of 10 tons or more of that HAP). This is all spelled out in the instructions to the AOR form. See section (2) Emissions Information, "Pollutants Subject to Reporting Thresholds."

2009 is not a HAP reporting year.

BUT...IF THERE IS A LIMIT FOR A POLLUTANT THEN THEY MUST REPORT EMISSIONS FOR THAT POLLUTANT.

From the instructions to the AOR, "For any pollutant that is subject to a numerical emission limiting standard, either by rule or permit condition, a set of Fields 2, 4 and 5 should be completed for each such pollutant, for each SCC, even if quantities are small....If the permit contains a numerical emission limiting standard for 'any' hazardous air pollutant (HAP), without specifying a particular HAP, Fields 2, 4 and 5 should be completed for each HAP with emissions equal to or greater than 1000 pounds per year."

Hope this helps. Sounds like PPPP has limits for HAP, so they should report HAP. (Disclaimer: I did not review subpart PPPP and I don't know what facility this is, so I didn't review its permit.)

~ Greg D.

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From: Parmer, Cadedra
Sent: Wednesday, May 12, 2010 3:23 PM
To: DeAngelo, Gregory
Subject: FW: HAPS reporting

Greg,

I'm not familiar with subpart PPPP. Could you please reply to Ray's email? Thanks,.

Cadedra

From: Gordon, Ray (DERM) [GordoR@miamidade.gov]
Sent: Wednesday, May 12, 2010 9:08 AM
To: Parmer, Cadedra
Subject: HAPS reporting

I have a TV facility (subject to subpart PPPP which includes a limit for HAPS) that usually reports the HAPS in their AOR. This year they did not include any HAPS in their report. I called the facility and they said their consultant told them they do not have HAPS reporting is not required for 2009. Is this true?

Ray A. Gordon
Special Projects Administrator
Office: 305-372-6925
gordor@miamidade.gov

"Delivering Excellence Every Day"

3.12 FAQ: Landfill Emission Factors

-----Original Message-----

From: Driscoll.Tom@epamail.epa.gov [<mailto:Driscoll.Tom@epamail.epa.gov>]

Sent: Wednesday, July 07, 2010 8:35 AM

To: Stevens, Kelly

Subject: Fw: Landfill EF Question

Hi Kelly,
Here is another response.

Thank you,

Thomas A. Driscoll
USEPA/OAQPS/SPPD
Measurement Policy Group, Room D221D
109 TW Alexander Drive (D243-05)
Research Triangle Park, NC 27709
(919)541-5135 (Voice)/(919)541-1039 (Fax)
email address: driscoll.tom@epa.gov

"Adopt the pace of nature: her secret is patience"
Ralph Waldo Emerson

----- Forwarded by Tom Driscoll/RTP/USEPA/US on 07/07/2010 08:34 AM

You need to follow the guidance in AP42. The air dilution needs to be adjusted and there are equations for doing that. Once that is done, then the CH₄/CO₂ ratio is more in line with 50/50 although there can be some variability...

I was at a landfill all of last week doing field testing... The equations you need are in AP42. You should be using the .5 rather than the .4.

Susan Thorneloe
U.S. Environmental Protection Agency
Office of Research and Development
National Risk Management Research Laboratory
109 T.W. Alexander Drive (E305-02)
Research Triangle Park, NC 27711
Phone: 919/541-2709

FYI.

Thank you,

Thomas A. Driscoll
USEPA/OAQPS/SPPD
Measurement Policy Group, Room D221D
109 TW Alexander Drive (D243-05)
Research Triangle Park, NC 27709
(919)541-5135 (Voice)/(919)541-1039 (Fax)
email address: driscoll.tom@epa.gov

"Adopt the pace of nature: her secret is patience"
Ralph Waldo Emerson

----- Forwarded by Tom Driscoll/RTP/USEPA/US on 07/06/2010 03:52 PM

Kelly,
Hi Kelly, sorry this is a week late. This is the only response i
received.
i was hoping the Susan Thorneloe, who developed the LandGems model would
weigh in as well.

Please let me know if you have any other questions.

Thanks,
tom
Thank you,

Thomas A. Driscoll
USEPA/OAQPS/SPPD
Measurement Policy Group, Room D221D
109 TW Alexander Drive (D243-05)
Research Triangle Park, NC 27709
(919)541-5135 (Voice)/(919)541-1039 (Fax)
email address: driscoll.tom@epa.gov

"Adopt the pace of nature: her secret is patience"
Ralph Waldo Emerson

----- Forwarded by Tom Driscoll/RTP/USEPA/US on 07/06/2010 03:49 PM

Tom:
Except for the initial assumption that all landfill gas is 50% CH₄, this
seems reasonable to me. In your background report, you show an average
of 40.8% CH₄ and 34.2% CO₂ (the remainder was CO, N₂ and O₂). Also if
you look at the range for CH₄ it went from a low of 18.3% and a high of
61.7%. So based upon the averages, they should multiply their total gas
by 0.41 rather than .5. Of course, a better answer would be for them to
determine the percent methane in their landfill gas and do the math.

Ron Myers
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards

Sector Policy and Programs Division
Monitoring Policy Group, D243-05
RTP NC 27711
Tel. 919.541.5407
Fax 919.541.1039
E-mail myers.ron@epa.gov

Mr. Driscoll,

We are currently conducting our emissions inventory reviews for 2009. A landfill facility of ours used an unusual approach for computing emissions from a flare, SCC50100410. The SCC unit is "million cubic feet of waste gas burned," and Table 2.4-5 in AP-42 provides emission factors based on lbs per 106 dscf of methane. They figure since landfill gas is typically 50% methane, they should halve all of these emission factors to compute their emissions that are based on landfill gas, not methane.

Is this a correct procedure? We have not seen it before and it seems odd that the table in AP-42 and SCC unit do not match up. Thank you.

Kelly Stevens, Meteorologist
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Florida Department of Environmental Protection
2600 Blair Stone Rd, MS 5500
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Which emission method code should I use for...?

Emission Method Code	Examples of Proper Use
(1A) CEMS MEASUREMENTS	Emissions based on continuous emission monitoring systems (CEMS) results
(2) MATERIAL BALANCE	- Mass balance calculations using HAP, VOC content information (typically from product data sheets or MSDS) - SO₂ emission calculations based on S content of fuel such as fuel oil or coal sampling to determine S content, natural gas vendor's report of S content (typically grains/dscf), or fuel oil vendor's certification of S content
(3A) EMISSION FACTOR BASED ON SITE-SPECIFIC DATA	- Emission factors developed from site-specific stack test results, even if facility used less than every valid test from at least a 5-year period to develop the emission factor - Emission factors developed from stack testing performed on similar emission units at the same facility (i.e., site-specific stack test results, but a different emission unit) - Emission factors developed from stack tests performed by the manufacturer during initial installation and testing, often done to validate the manufacturer's guarantee - Emission estimates from predictive emission monitoring systems (PEMS) or continuous parameter monitoring systems (CPMS) results
(3B) EMISSION FACTOR FROM AP-42, OTHER PUBLICATION	- Emission factors taken from an AP-42 section - EPA software, spreadsheet, or model results (e.g., TANKS, LANDGEM) - AP-42 equation-based emission factors (e.g., dust PM emissions from paved and unpaved roads) <i>Unified Emission Factors for Open Molding of Composites</i>
(4) SIMILAR PROCESS IN AP-42, OTHER PUBLICATION	AP-42 for a similar process
(5) OTHER EMISSION FACTOR	- Vendor-supplied emission factors - Emission factors developed from stack testing performed on similar emission units at a different facility (i.e., not site-specific stack test results) - Emission factors derived from manufacturer's performance guarantees or from other information from the manufacturer detailing the performance of a typical make/model

3.12 Table: Higher Heating Value Chart

Fuel Type	Higher Heating Value (HHV)			Ref
	Typical	Common Range	Units	
Coal and Coke				
Anthracite	25.09	22 - 28	MMBtu / ton	7,20
Bituminous	24.93	24 - 30	MMBtu / ton	7,3,25
Coke	24.80	25 - 26	MMBtu / ton	7,13
Lignite	14.21	14 - 17	MMBtu / ton	7,20
Mixed (commercial sector)	21.39		MMBtu / ton	7
Mixed (electric power sector)	19.73		MMBtu / ton	7
Mixed (industrial coking)	26.28		MMBtu / ton	7
Mixed (industrial sector)	22.35		MMBtu / ton	7
Subbituminous	17.25	17-18	MMBtu / ton	7,25
Natural Gas				
Natural gas (pipeline, weighted U.S. average)	1028	1000-1100	MMBtu / million cubic feet	2,3
Petroleum Products				
Butane	101	101 - 130	MMBtu / 1000 gallons	1,2,7,12
Butylene	103		MMBtu / 1000 gallons	7
Ethane	96	74 - 96	MMBtu / 1000 gallons	7,24
Ethylene	100		MMBtu / 1000 gallons	7
Fuel oil, No. 1 (distillate)	139	138 - 140	MMBtu / 1000 gallons	7,27
Fuel oil, No. 2 (distillate) (diesel)	138	134 - 142	MMBtu / 1000 gallons	7,11
Fuel oil, No. 4 (distillate)	146	146 - 147	MMBtu / 1000 gallons	7,27
Fuel oil, No. 5 (residual)	140		MMBtu / 1000 gallons	7
Fuel oil, No. 6 (residual)	150	140 - 150	MMBtu / 1000 gallons	7,11
Gasoline, aviation	120		MMBtu / 1000 gallons	7
Gasoline, motor	125	115 - 125	MMBtu / 1000 gallons	7,14
Gasoline, natural	110	110 - 117	MMBtu / 1000 gallons	5,7
Isobutane	97	94 - 97	MMBtu / 1000 gallons	7,22
Isobutylene	103		MMBtu / 1000 gallons	7
Jet fuel (kerosene-type)	135		MMBtu / 1000 gallons	7,26
Kerosene	135	130 - 140	MMBtu / 1000 gallons	7,18
Liquefied natural gas (LNG)	80	75 - 85	MMBtu / 1000 gallons	13
Liquefied petroleum gas (LPG)	92	85 - 92	MMBtu / 1000 gallons	7,13
Lubricants	144		MMBtu / 1000 gallons	7
Naphtha (< 401° F)	125		MMBtu / 1000 gallons	7
Naptha, special	125		MMBtu / 1000 gallons	7
Oil, asphalt and road	158		MMBtu / 1000 gallons	7,22
Oil, crude	138	129 - 138	MMBtu / 1000 gallons	7,13
Oil, heavy gas	148		MMBtu / 1000 gallons	7
Oil, unfinished	139		MMBtu / 1000 gallons	7
Other oil (> 401° F)	139		MMBtu / 1000 gallons	7
Pentanes plus	110		MMBtu / 1000 gallons	7
Petrochemical feedstocks	129		MMBtu / 1000 gallons	7
Petroleum coke	143	140 - 143	MMBtu / 1000 gallons	7,21,22
Propane	91	90 - 91	MMBtu / 1000 gallons	1,2,7
Propylene	91		MMBtu / 1000 gallons	7
Still gas	143	142 - 143	MMBtu / 1000 gallons	7,22
Waste-Derived Fuels				
Landfill gas	500	350 - 600	MMBtu / million cubic feet	8,9
Solid waste (refuse-derived fuel, RDF)	10	6 - 12	MMBtu / ton	1,2
Solid waste (municipal solid waste)	9.95		MMBtu / ton	7
Solid waste (segregated RDF)	16	15 - 17	MMBtu / ton	1,2
Tire-derived fuel	26.87	24 - 32	MMBtu / ton	1,2,3,7
Biomass Fuels and Byproducts				
Agricultural byproducts	8.25	8.00 - 8.25	MMBtu / ton	7,23
Bagasse	14	10 - 17	MMBtu / ton	1,2,21
Biodiesel (100%)	128	117 - 128	MMBtu / 1000 gallons	7,17
Biogas (captured methane)	841	896 - 995	MMBtu / million cubic feet	7,16
Black liquor	12	11 - 12	MMBtu / ton	23
Blast furnace gas	92		MMBtu / million cubic feet	7
Coke oven gas	599		MMBtu / million cubic feet	7
Ethanol (100%)	84	75 - 85	MMBtu / 1000 gallons	7,15
Peat	8.00		MMBtu / ton	7,23
Rendered animal fat	125		MMBtu / 1000 gallons	7
Rice hulls	13	13 - 14	MMBtu / ton	21
Solid biomass byproducts	25.83	25 - 26	MMBtu / ton	7,23
Switchgrass	14	14 - 15	MMBtu / ton	21
Vegetable oil	120		MMBtu / 1000 gallons	7
Wood and wood residuals	15.38	12 - 16	MMBtu / ton	7,10,21

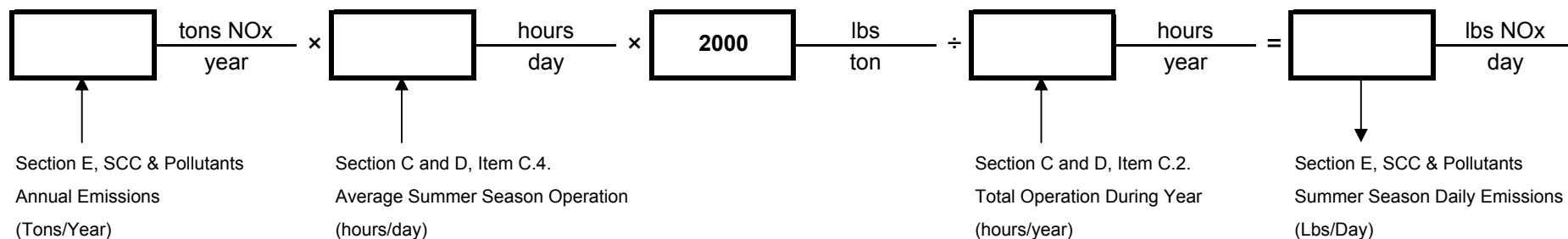
3.12 Table: Higher Heating Value Chart

References:

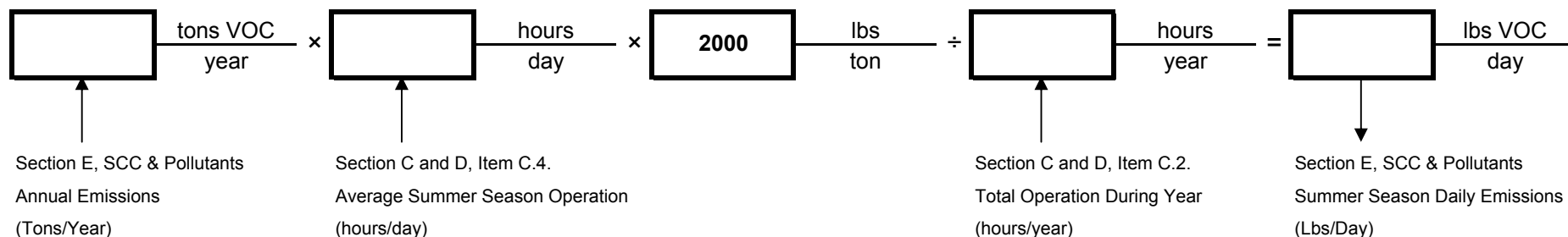
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Design Assistance Center)
- 20) Inventory of Nonutility Electric Power Plants, Energy Information Administration: Office of Coal, Nuclear, Electric and Alternative Fuels, U.S. DOE, Washington,D.C. January 2003, pp254.
- 21) <http://cta.ornl.gov/bedb/pdf/Appendicies.pdf>
- 22) http://www.eia.doe.gov/mer/pdf/pages/sec12_1.pdf
- 23) <http://www.repp.org/bioenergy/link3.htm>
Natural Gas Star)
- 25) http://edocket.access.gpo.gov/cfr_2008/julqtr/pdf/40cfr72AppD.pdf
(<http://www.bren.ucsb.edu/academics/courses/219/Readings/06FastFacts%20Greenhouse%20Gas%20Emissions%20and%20Sinks%20EPA.pdf>)
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summer season worksheet

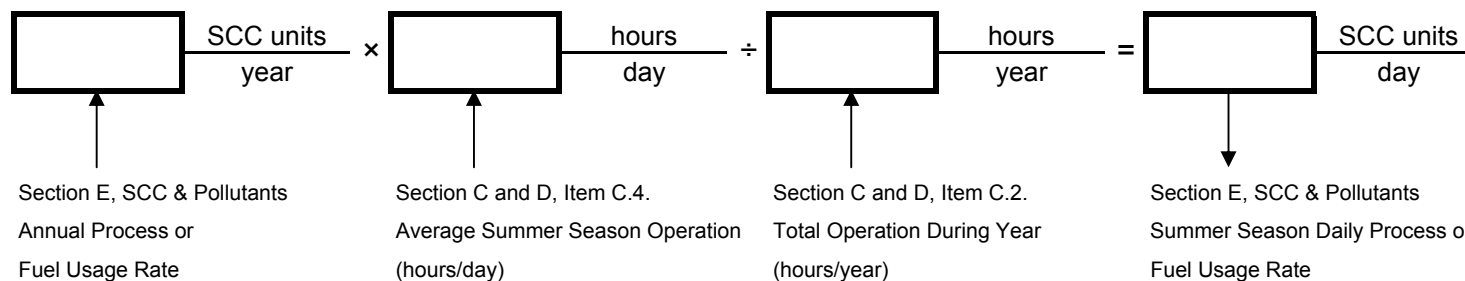
NO_x



VOC



PROCESS OR FUEL USAGE RATE



QUICK CHECK FOR ERRORS IN THE FACILITY'S SUBMITTAL

$C.2.(\text{hours/year}) \times C.3. \text{ JJA } (\%) \approx$
 $C.4.(\text{hours/day}) \times C.5.(\text{days/season})$

IF $C2 \times C3(\text{JJA}) \neq C4 \times C5$,
DOUBLE-CHECK THE DATA

summer season worksheet example

NO_x

$$\begin{array}{ccccccc}
 \boxed{2.9} & \xrightarrow{\text{tons NO}_x \text{ year}} & \times & \boxed{8} & \xrightarrow{\text{hours day}} & \times & \boxed{2000} & \xrightarrow{\text{lbs ton}} & \div & \boxed{2430} & \xrightarrow{\text{hours year}} & = & \boxed{19.1} & \xrightarrow{\text{lbs NO}_x \text{ day}} \\
 \uparrow & & & \uparrow & & & & & & \uparrow & & & \downarrow \\
 \text{Section E, SCC \& Pollutants} & & & \text{Section C and D, Item C.4.} & & & & & & \text{Section C and D, Item C.2.} & & & \text{Section E, SCC \& Pollutants} \\
 \text{Annual Emissions} & & & \text{Average Summer Season Operation} & & & & & & \text{Total Operation During Year} & & & \text{Summer Season Daily Emissions} \\
 \text{(Tons/Year)} & & & \text{(hours/day)} & & & & & & \text{(hours/year)} & & & \text{(Lbs/Day)}
 \end{array}$$

VOC

$$\begin{array}{ccccccc}
 \boxed{0.2} & \xrightarrow{\text{tons VOC year}} & \times & \boxed{8} & \xrightarrow{\text{hours day}} & \times & \boxed{2000} & \xrightarrow{\text{lbs ton}} & \div & \boxed{2430} & \xrightarrow{\text{hours year}} & = & \boxed{1.32} & \xrightarrow{\text{lbs VOC day}} \\
 \uparrow & & & \uparrow & & & & & & \uparrow & & & \downarrow \\
 \text{Section E, SCC \& Pollutants} & & & \text{Section C and D, Item C.4.} & & & & & & \text{Section C and D, Item C.2.} & & & \text{Section E, SCC \& Pollutants} \\
 \text{Annual Emissions} & & & \text{Average Summer Season Operation} & & & & & & \text{Total Operation During Year} & & & \text{Summer Season Daily Emissions} \\
 \text{(Tons/Year)} & & & \text{(hours/day)} & & & & & & \text{(hours/year)} & & & \text{(Lbs/Day)}
 \end{array}$$

PROCESS OR FUEL USAGE RATE

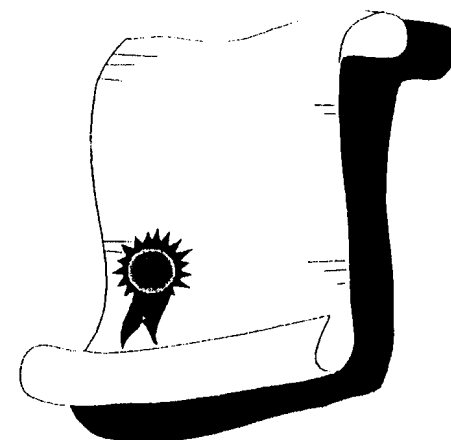
$$\begin{array}{ccccccc}
 \boxed{1.195} & \xrightarrow{\text{SCC units year}} & \times & \boxed{8} & \xrightarrow{\text{hours day}} & \div & \boxed{2430} & \xrightarrow{\text{hours year}} & = & \boxed{0.00393} & \xrightarrow{\text{SCC units day}} \\
 \uparrow & & & \uparrow & & & \uparrow & & & \downarrow \\
 \text{Section E, SCC \& Pollutants} & & & \text{Section C and D, Item C.4.} & & & \text{Section C and D, Item C.2.} & & & \text{Section E, SCC \& Pollutants} \\
 \text{Annual Process or} & & & \text{Average Summer Season Operation} & & & \text{Total Operation During Year} & & & \text{Summer Season Daily Process or} \\
 \text{Fuel Usage Rate} & & & \text{(hours/day)} & & & \text{(hours/year)} & & & \text{Fuel Usage Rate}
 \end{array}$$

QUICK CHECK FOR ERRORS IN THE FACILITY'S SUBMITTAL

$$\begin{array}{l}
 \text{C.2. (hours/year)} \times \text{C.3. JJA (\%)} \approx \\
 \text{C.4. (hours/day)} \times \text{C.5. (days/season)}
 \end{array}$$

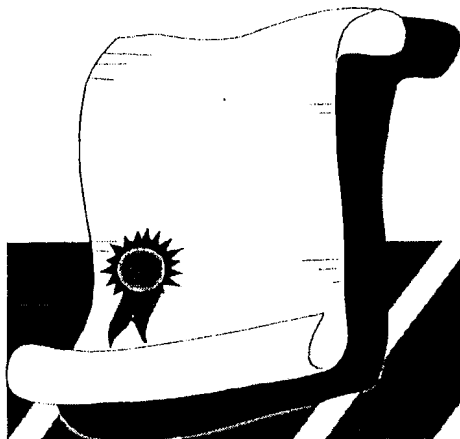
**IF C2 × C3(JJA) ≠ C4 × C5,
DOUBLE-CHECK THE DATA**

POLLUTANTS APPEARING ON MORE THAN ONE LIST



Pollutant Name	CAS No.	Preferred ID	Other ID
1,1-Dimethyl hydrazine	57-14-7	H074	T026
1,3-Butadiene	106-99-0	H026	F004
Acetaldehyde	75-07-0	H001	F001
Acrolein	107-02-8	H006	T001
Acrylonitrile	107-13-1	H009	T002
Carbon disulfide	75-15-0	H032	T014
Carbon oxysulfide (Carbonyl sulfide)	463-58-1	H034	F011
Chlorine	7782-50-5	H038	T015
Chloroform	67-66-3	H043	T017
Chloromethyl methyl ether	107-30-2	H044	T019
Epichlorohydrin (1-Chloro-2,3-	106-89-8	H082	T027
Ethyl chloride (Chloroethane)	75-00-3	H087	F024
Ethylene oxide	75-21-8	H092	T030
Ethylene imine (Aziridine)	151-56-4	H091	T029
Formaldehyde	50-00-0	H095	T032

Pollutant Name	CAS No.	Preferred ID	Other ID
Hydrazine	302-01-2	H105	T034
Hydrogen Chloride	7647-01-0	H106	H1CL T035 T037
Hydrogen fluoride (Hydrofluoric acid)	7664-39-3	H107	T038
Hydrogen Sulfide	7783-06-4	H2S	T040
Lead		PB	H110
Methyl chloride (Chloromethane)	74-87-3	H118	T045
Methyl hydrazine	60-34-4	H121	T047
Methyl isocyanate	624-83-9	H124	T048
Phosgene	75-44-5	H146	T058
Phosphine	7803-51-2	H147	T059
Propylene oxide	75-56-9	H157	T066
Sulfur Dioxide	7446-09-5	SO2	T067
Titanium tetrachloride	7550-45-0	H168	T072
Vinyl acetate (Vinyl acetate monomer)	108-05-4	H182	T077
Vinyl chloride	75-01-4	H184	F058
Vinylidene chloride (1,1-Dichloroethylene)	75-35-4	H185	F061



Hazardous Air Pollutant (HAP) List

Pollutant Name	CAS No.	ID Code	VOC?
Acetaldehyde	75-07-0	H001	YES
Acetamide	60-35-5	H002	YES
Acetonitrile	75-05-8	H003	YES
Acetophenone	98-86-2	H004	YES
2-Acetylaminofluorene	53-96-3	H005	YES
Acrolein	107-02-8	H006	YES
Acrylamide	79-06-1	H007	YES
Acrylic acid	79-10-7	H008	YES
Acrylonitrile	107-13-1	H009	YES
Allyl chloride	107-05-1	H010	YES
4-Aminobiphenyl	92-67-1	H011	YES
Aniline	62-53-3	H012	YES
o-Anisidine	90-04-0	H013	YES
Antimony Compounds		H014	
Arsenic Compounds (inorganic including arsine)		H015	
Asbestos	1332-21-4	H016	
Benzene (including benzene from gasoline)	71-43-2	H017	YES
Benzidine	92-87-5	H018	YES
Benzotrichloride	98-07-7	H019	YES
Benzyl chloride	100-44-7	H020	YES
Beryllium Compounds		H021	
Biphenyl	92-52-4	H022	YES
Bis(2-ethylhexyl)phthalate (DEHP)	117-81-7	H023	YES
Bis(chloromethyl)ether	542-88-1	H024	YES
Bromoform	75-25-2	H025	YES
1,3-Butadiene	106-99-0	H026	YES
Cadmium Compounds		H027	
Calcium cyanamide	156-62-7	H028	
(Reserved—was caprolactam, CAS No. 105-60-2)		H029	YES
Captan	133-06-2	H030	
Carbaryl	63-25-2	H031	

3.12 Table: HAP vs. VOC List

Pollutant Name	CAS No.	ID Code	VOC?
Carbon disulfide	75-15-0	H032	YES
Carbon tetrachloride	56-23-5	H033	YES
Carbonyl sulfide	463-58-1	H034	YES
Catechol	120-80-9	H035	YES
Chloramben	133-90-4	H036	
Chlordane	57-74-9	H037	YES
Chlorine	7782-50-5	H038	
Chloroacetic acid	79-11-8	H039	YES
2-Chloroacetophenone	532-27-4	H040	YES
Chlorobenzene	108-90-7	H041	YES
Chlorobenzilate	510-15-6	H042	YES
Chloroform	67-66-3	H043	YES
Chloromethyl methyl ether	107-30-2	H044	YES
Chloroprene	126-99-8	H045	YES
Chromium Compounds		H046	
Cobalt Compounds		H047	
Coke Oven Emissions		H048	YES
Cresols/Cresylic acid (isomers and mixture)	1319-77-3	H049	YES
o-Cresol	95-48-7	H050	YES
m-Cresol	108-39-4	H051	YES
p-Cresol	106-44-5	H052	YES
Cumene	98-82-8	H053	YES
Cyanide Compounds (X'CN, where X = H' or any other group where a formal dissociation may occur; for example, KCN or Ca(CN) ₂)		H054	
2,4-D, salts and esters	94-75-7	H055	YES
DDE	3547-04-4	H056	YES
Diazomethane	334-88-3	H057	YES
Dibenzofurans	132-64-9	H058	
1,2-Dibromo-3-chloropropane	96-12-8	H059	YES
Dibutylphthalate	84-74-2	H060	YES
1,4-Dichlorobenzene(p)	106-46-7	H061	YES
3,3-Dichlorobenzidene	91-94-1	H062	YES
Dichloroethyl ether (Bis(2-chloroethyl)ether)	111-44-4	H063	YES

3.12 Table: HAP vs. VOC List

Pollutant Name	CAS No.	ID Code	VOC?
1,3-Dichloropropene	542-75-6	H064	YES
Dichlorvos	62-73-7	H065	YES
Diethanolamine	111-42-2	H066	YES
N,N-Diethyl aniline (N,N-Dimethylaniline)	121-69-7	H067	YES
Diethyl sulfate	64-67-5	H068	YES
3,3-Dimethoxybenzidine	119-90-4	H069	YES
Dimethyl aminoazobenzene	60-11-7	H070	YES
3,3-Dimethyl benzidine	1119-93-7	H071	YES
Dimethyl carbamoyl chloride	79-44-7	H072	YES
Dimethyl formamide	68-12-2	H073	YES
1,1-Dimethyl hydrazine	57-14-7	H074	YES
Dimethyl phthalate	131-11-3	H075	YES
Dimethyl sulfate	77-78-1	H076	YES
4,6-Dinitro-o-cresol, and salts	534-52-1	H077	
2,4-Dinitrophenol	51-28-5	H078	YES
2,4-Dinitrotoluene	121-14-2	H079	YES
1,4-Dioxane (1,4-Diethyleneoxide)	123-91-1	H080	YES
1,2-Diphenylhydrazine	122-66-7	H081	YES
Epichlorohydrin (1-Chloro-2,3-epoxypropane)	106-89-8	H082	YES
1,2-Epoxybutane	106-88-7	H083	YES
Ethyl acrylate	140-88-5	H084	YES
Ethyl benzene	100-41-4	H085	YES
Ethyl carbamate (Urethane)	51-79-6	H086	
Ethyl chloride (Chloroethane)	75-00-3	H087	YES
Ethylene dibromide (Dibromoethane)	106-93-4	H088	YES
Ethylene dichloride (1,2-Dichloroethane)	10706-2	H089	YES
Ethylene glycol	107-21-1	H090	YES
Ethylene imine (Aziridine)	151-56-4	H091	YES
Ethylene oxide	75-21-8	H092	YES

3.12 Table: HAP vs. VOC List

Pollutant Name	CAS No.	ID Code	VOC?
Ethylene thiourea	96-45-7	H093	
Ethylidene dichloride (1,1-Dichloroethane)	75-34-3	H094	YES
Formaldehyde	50-00-0	H095	YES
Glycol ethers (includes mono- and di-ethers of ethylene glycol, diethylene glycol, and triethylene glycol R-(OCH ₂ CH ₂) _n - OR' where: n = 1, 2, or 3; R = alkyl C7 or less; or R = phenyl or alkyl substituted phenyl; R' = H or alkyl C7 or less; or OR' consisting of carboxylic acid ester, sulfate, phosphate, nitrate, or sulfonate) (ethylene glycol monobutyl ether, EGBE, 2-Butoxyethanol, CAS No. 111-76-2, is a VOC, but EGBE is not a HAP)		H096	YES
Heptachlor	76-44-8	H097	YES
Hexachlorobenzene	118-74-1	H098	
Hexachlorobutadiene	87-68-3	H099	YES
Hexachlorocyclopentadiene	77-47-4	H100	YES
Hexachloroethane	67-72-1	H101	
Hexamethylene-1,6-diisocyanate	822-06-0	H102	
Hexamethylphosphoramide	680-31-9	H103	
Hexane	110-54-3	H104	YES
Hydrazine	302-01-2	H105	
Hydrochloric acid	7647-01-0	H106	
Hydrogen fluoride (Hydrofluoric acid)	7664-39-3	H107	
Hydroquinone	123-31-9	H108	YES
Isophorone	78-59-1	H109	YES
Lead Compounds		PB	
Lindane (all isomers)	58-89-9	H111	
Maleic anhydride	108-31-6	H112	
Manganese Compounds		H113	
Mercury Compounds		H114	
Methanol	67-56-1	H115	YES
Methoxychlor	72-43-5	H116	YES
Methyl bromide (Bromomethane)	74-83-9	H117	YES

3.12 Table: HAP vs. VOC List

Pollutant Name	CAS No.	ID Code	VOC?
Methyl chloride (Chloromethane)	74-87-3	H118	YES
Methyl chloroform (1,1,1-Trichloroethane)	71-55-6	H119	
(Reserved— was methyl ethyl ketone, aka 2-butanone, CAS No. 78-93-3)		H120	YES
Methyl hydrazine	60-34-4	H121	YES
Methyl iodide (Iodomethane)	74-88-4	H122	YES
Methyl isobutyl ketone (Hexone)	108-10-1	H123	YES
Methyl isocyanate	624-83-9	H124	YES
Methyl methacrylate	80-62-6	H125	YES
Methyl tert butyl ether	1634-04-4	H126	YES
4,4-Methylene bis (2-chloroaniline)	101-14-4	H127	
Methylene chloride (Dichloromethane)	75-09-2	H128	
Methylene diphenyl diisocyanate (MDI)	101-68-8	H129	
4,4-Methylenedianiline	101-77-9	H130	
Mineral fibers (fine) (includes mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers – or other mineral derived fibers – of average diameter 1 micrometer or less)		H131	
Naphthalene	91-20-3	H132	YES
Nickel Compounds		H133	
Nitrobenzene	98-95-3	H134	YES
4-Nitrobiphenyl	92-93-3	H135	YES
4-Nitrophenol	100-02-7	H136	YES
2-Nitropropane	79-49-6	H137	YES
N-Nitroso-N-methylurea	684-93-5	H138	YES
N-Nitrosodimethylamine	62-75-9	H139	YES
N-Nitrosomorpholine	59-89-2	H140	YES
Parathion	56-38-2	H141	YES
Pentachloronitrobenzene (Quintobenzene)	82-68-8	H142	YES

3.12 Table: HAP vs. VOC List

Pollutant Name	CAS No.	ID Code	VOC?
Pentachlorophenol	87-86-5	H143	YES
Phenol	108-95-2	H144	YES
p-Phenylenediamine	106-50-3	H145	YES
Phosgene	75-44-5	H146	YES
Phosphine	7803-51-2	H147	
Phosphorus	7723-14-0	H148	
Phthalic anhydride	85-44-9	H149	
Polychlorinated biphenyls (Aroclors)	1336-36-3	H150	YES
Polycyclic organic matter (includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100 °C)		H151	YES
1,3-Propane sultone	1120-71-4	H152	
beta-Propiolactone	57-57-8	H153	YES
Propionaldehyde	123-38-6	H154	YES
Propoxur (Baygon)	114-26-1	H155	
Propylene dichloride (1,2-Dichloropropane)	78-87-5	H156	YES
Propylene oxide	75-56-9	H157	YES
1,2-Propylenimine (2-Methyl aziridine)	75-55-8	H158	YES
Quinoline	91-22-5	H159	YES
Quinone	106-51-4	H160	YES
Radionuclides (including radon) (a type of atom which spontaneously undergoes radioactive decay)		H161	
Selenium Compounds		H162	
Styrene	100-42-5	H163	YES
Styrene oxide	96-09-3	H164	YES
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746-01-6	H165	
1,1,2,2-Tetrachloroethane	79-34-5	H166	YES
Tetrachloroethylene (Perchloroethylene)	127-18-4	H167	
Titanium tetrachloride	7550-45-0	H168	
Toluene	108-88-3	H169	YES
2,4-Toluene diamine	95-80-7	H170	YES

Pollutant Name	CAS No.	ID Code	VOC?
2,4-Toluene diisocyanate	584-84-9	H171	YES
o-Toluidine	95-53-4	H172	YES
Toxaphene (chlorinated camphene)	8001-35-2	H173	
1,2,4-Trichlorobenzene	120-82-1	H174	YES
1,1,2-Trichloroethane	79-00-5	H175	YES
Trichloroethylene	79-01-6	H176	YES
2,4,5-Trichlorophenol	95-95-4	H177	YES
2,4,6-Trichlorophenol	88-06-2	H178	YES
Triethylamine	121-44-8	H179	YES
Trifluralin	1582-09-8	H180	
2,2,4-Trimethylpentane	540-84-1	H181	YES
Vinyl acetate	108-05-4	H182	YES
Vinyl bromide	593-60-2	H183	YES
Vinyl chloride	75-01-4	H184	YES
Vinylidene chloride (1,1-Dichloroethylene)	75-35-4	H185	YES
Xylenes (isomers and mixtures)	1330-20-7	H186	YES
o-Xylenes	95-47-6	H187	YES
m-Xylenes	108-38-3	H188	YES
p-Xylenes	106-42-3	H189	YES

For all listings above which contain the word "compounds" and glycol ethers, the following applies: unless otherwise specified, these listings are defined as including the named chemical and any unique chemical substance that contains the named chemical (i.e., antimony, arsenic, etc.) as part of that chemical's infrastructure.

Definition of Volatile Organic Compounds (VOC)

As of 3/31/2009

40 CFR 51.100(s) - Definition - Volatile organic compounds (VOC)

(s) "Volatile organic compounds (VOC)" means any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions.

(1) This includes any such organic compound other than the following, which have been determined to have negligible photochemical reactivity:

- methane
- ethane
- methylene chloride (dichloromethane)
- 1,1,1-trichloroethane (methyl chloroform)
- 1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113)
- trichlorofluoromethane (CFC-11)
- dichlorodifluoromethane (CFC-12)
- chlorodifluoromethane (HCFC-22)
- trifluoromethane (HFC-23)
- 1,2-dichloro 1,1,2,2-tetrafluoroethane (CFC-114)
- chloropentafluoroethane (CFC-115)
- 1,1,1-trifluoro 2,2-dichloroethane (HCFC-123)
- 1,1,1,2-tetrafluoroethane (HFC-134a)
- 1,1-dichloro 1-fluoroethane (HCFC-141b)
- 1-chloro 1,1-difluoroethane (HCFC-142b)
- 2-chloro-1,1,1,2-tetrafluoroethane (HCFC-124)
- pentafluoroethane (HFC-125)
- 1,1,2,2-tetrafluoroethane (HFC-134)
- 1,1,1-trifluoroethane (HFC-143a)
- 1,1-difluoroethane (HFC-152a)
- parachlorobenzotrifluoride (PCBTF)
- cyclic, branched, or linear completely methylated siloxanes
- acetone
- perchloroethylene (tetrachloroethylene)
- 3,3-dichloro-1,1,1,2,2-pentafluoropropane (HCFC-225ca)
- 1,3-dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb)
- 1,1,1,2,3,4,4,5,5,5-decafluoropentane (HFC 43-10mee)
- difluoromethane (HFC-32)
- ethylfluoride (HFC-161)
- 1,1,1,3,3,3-hexafluoropropane (HFC-236fa)
- 1,1,2,2,3-pentafluoropropane (HFC-245ca)
- 1,1,2,3,3-pentafluoropropane (HFC-245ea)
- 1,1,1,2,3-pentafluoropropane (HFC-245eb)
- 1,1,1,3,3-pentafluoropropane (HFC-245fa)
- 1,1,1,2,3,3-hexafluoropropane (HFC-236ea)

- 1,1,1,3,3-pentafluorobutane (HFC-365mfc)
- chlorofluoromethane (HCFC-31)
- 1-chloro-1-fluoroethane (HCFC-151a)
- 1,2-dichloro-1,1,2-trifluoroethane (HCFC-123a)
- 1,1,1,2,2,3,3,4,4-nonafluoro-4-methoxy-butane (C4F9OCH3 or HFE-7100)
- 2-(difluoromethoxymethyl)-1,1,1,2,3,3,3-heptafluoropropane ((CF3)2CFCF2OCH3)
- 1-ethoxy-1,1,2,2,3,3,4,4,4-nonafluorobutane (C4F9OC2H5 or HFE-7200)
- 2-(ethoxydifluoromethyl)-1,1,1,2,3,3,3-heptafluoropropane ((CF3)2CFCF2OC2H5)
- methyl acetate
- 1,1,1,2,2,3,3-heptafluoro-3-methoxy-propane (n-C3F7OCH3 or HFE-7000)
- 3-ethoxy-1,1,1,2,3,4,4,5,5,6,6,6-dodecafluoro-2-(trifluoromethyl) hexane (HFE-7500)
- 1,1,1,2,3,3,3-heptafluoropropane (HFC 227ea)
- methyl formate (HCOOCH3)
- 1,1,1,2,2,3,4,5,5,5-decafluoro-3-methoxy-4-trifluoromethyl-pentane (HFE-7300)
- dimethyl carbonate
- propylene carbonate
- and perfluorocarbon compounds which fall into these classes:
 - cyclic, branched, or linear, completely fluorinated alkanes,
 - cyclic, branched, or linear, completely fluorinated ethers with no unsaturations,
 - cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations, and
 - sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

(2) For purposes of determining compliance with emissions limits, VOC will be measured by the test methods in the approved State implementation plan (SIP) or 40 CFR Part 60, Appendix A, as applicable. Where such a method also measures compounds with negligible photochemical reactivity, these negligibly-reactive compounds may be excluded as VOC if the amount of such compounds is accurately quantified, and such exclusion is approved by the enforcement authority.

(3) As a precondition to excluding these compounds as VOC or at any time thereafter, the enforcement authority may require an owner or operator to provide monitoring or testing methods and results demonstrating, to the satisfaction of the enforcement authority, the amount of negligibly-reactive compounds in the source's emissions.

(4) For purposes of Federal enforcement for a specific source, the EPA shall use the test methods specified in the applicable EPA-approved SIP, in a permit issued pursuant to a program approved or promulgated under Title V of the Act, or under 40 CFR Part 51, Subpart I or Appendix S, or under 40 CFR Parts 52 or 60. The EPA shall not be bound by any State determination as to appropriate methods for testing or monitoring negligibly-reactive compounds if such determination is not reflected in any of the above provisions.

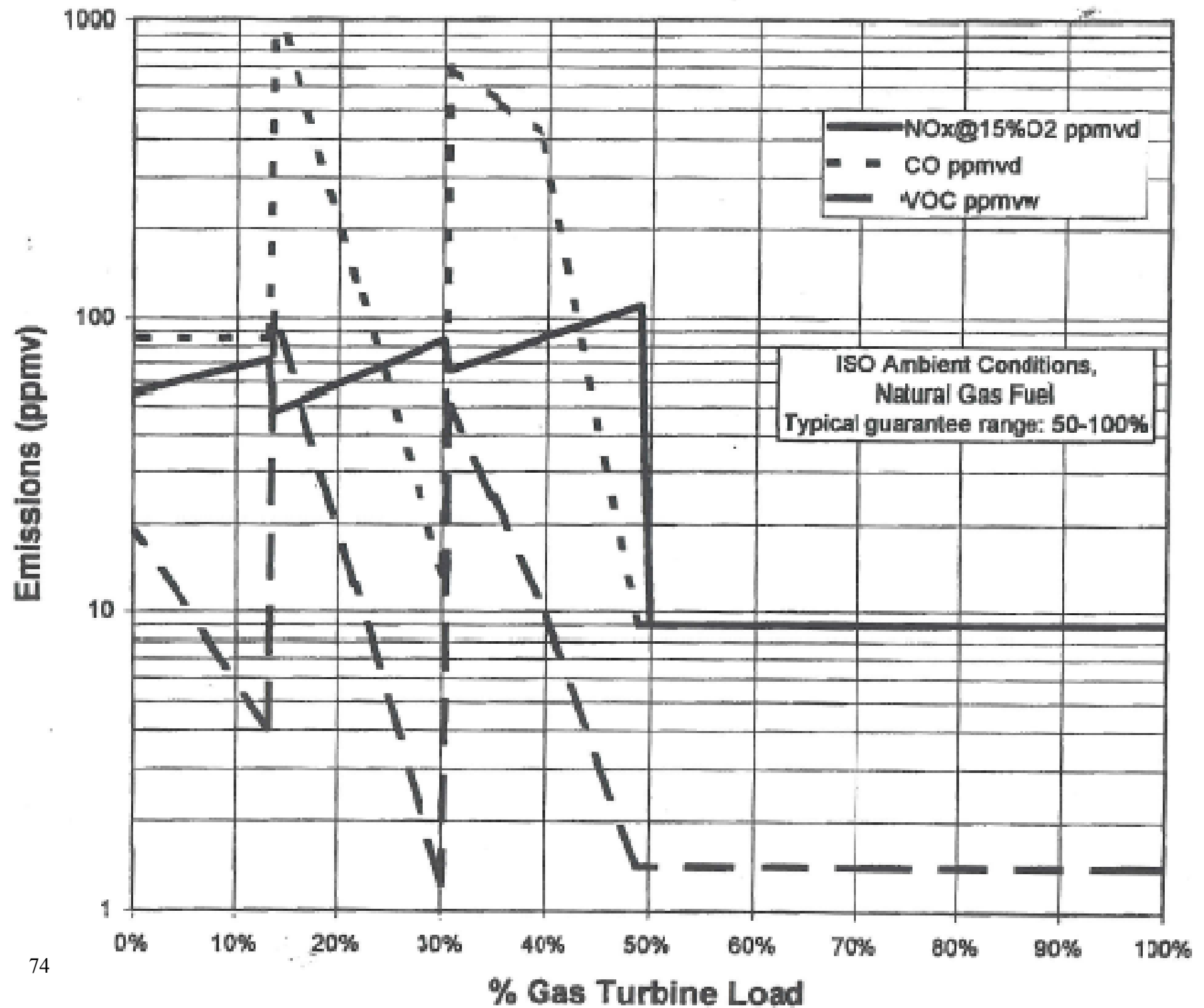
(5) The following compound(s) are VOC for purposes of all recordkeeping, emissions reporting, photochemical dispersion modeling and inventory requirements which apply to VOC and shall be uniquely identified in emission reports, but are not VOC for purposes of VOC emissions limitations or VOC content requirements: t-butyl acetate.

(6) For the purposes of determining compliance with California's aerosol coatings reactivity-based regulation, (as described in the California code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5, Article 3), any organic compound in the volatile portion of an aerosol coating is counted towards that product's reactivity-based limit. Therefore, the compounds identified in paragraph (s) of this section as negligibly reactive and excluded from EPA's definition of VOCs are to be counted

towards a product's reactivity limit for the purposes of determining compliance with California's aerosol coatings reactivity-based regulation.

(7) For the purposes of determining compliance with EPA's aerosol coatings reactivity based regulation (as described in 40 CFR Part 59 – National Volatile Organic Compound Emission Standards for Consumer and Commercial Products) any organic compound in the volatile portion of an aerosol coating is counted towards the product's reactivity-based limit, as provided in Part 59, Subpart E. Therefore, the compounds that are used in aerosol coating products and that are identified in paragraph (s) of this section as negligibly reactive and excluded from EPA's definition of VOC are to be counted towards a product's reactivity limit for the purposes of determining compliance with EPA's aerosol coatings reactivity-based national regulation, as provided in Part 59, Subpart E.

Source: http://www.epa.gov/ttn/naaqs/ozone/ozonetech/def_voc.htm (accessed 25 August 2009)



**TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION**

Florida Municipal Power Agency
Cane Island Power Park Unit 4

300-Megawatts Natural Gas-Fueled Combined Cycle Unit

Osceola County

DEP File No. 0970043-014-AC
PSD-FL-400



Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation

May 8, 2008

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Descriptions of Available NO_x Controls

Wet Injection (WI). Injection of either water or steam directly into the combustor lowers the flame temperature and thereby reduces thermal NO_x formation. There is a physical limit to the amount of water or steam that may be injected before flame instability or cold spots in the combustion zone would cause adverse operating conditions for the combustion turbine.

Advanced dual fuel combustor designs can tolerate large amounts of steam or water without causing flame instability and can typically achieve NO_x emissions in the range of 15 to 25 ppmvd for natural gas combustion and 30 to 42 ppmvd for fuel oil firing. Wet injection results in control efficiencies on the order of 80 to 85% for oil firing. These values often form the basis for further reduction to BACT limits by other techniques as discussed below.

CO and VOC emissions are relatively low for most gas turbines. However, steam and (more so) WI may increase emissions of both of these pollutants.

Combustion Controls: Dry Low NO_x (DLN) Burners. The excess air in lean combustion cools the flame and reduces the rate of thermal NO_x formation. Lean premixing of fuel and air prior to combustion can further reduce NO_x emissions. This is accomplished by minimizing localized fuel-rich pockets (and high temperatures) that can occur when trying to achieve lean mixing within the combustion zones. The above principle is incorporated into the General Electric DLN-2.6 can-annular combustor shown in Figure 7.

Each combustor includes six nozzles within which fuel and air have been fully pre-mixed. There are 16 small fuel passages around the circumference of each combustor can known as quaternary fuel pegs. The six nozzles are sequentially ignited as load increases in a manner that maintains lean pre-mixed combustion and flame stability.

NO_x, CO, and VOC design emission characteristics of the DLN-2.6 combustor while firing natural gas are given in Figure 8 for a unit tuned to meet a NO_x limit of 9 ppmvd @15% O₂. Based on the design characteristics, the combustor emits NO_x at concentrations of 9 ppmvd @15% O₂ at loads between 50 and 100% of capacity, but concentrations as high as 100 ppmvd @15% O₂ may occur at less than 50% of capacity. This suggests the need to minimize operation at low load conditions.

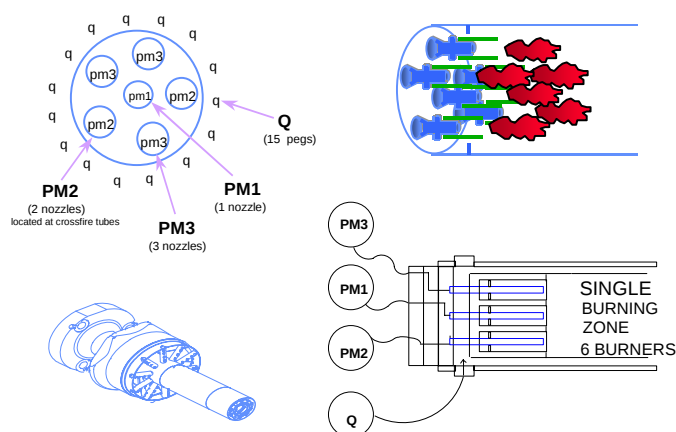


Figure 7. DLN-2.6 Fuel Nozzles

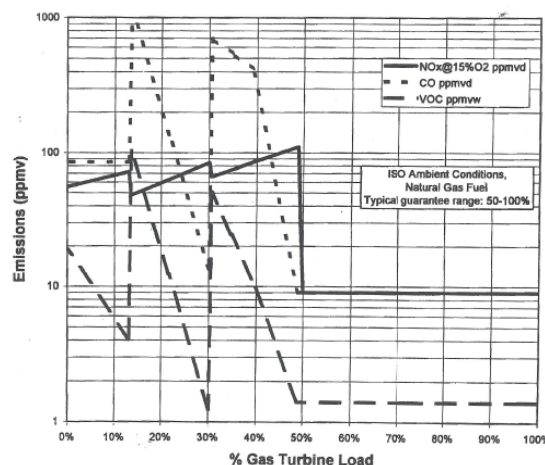


Figure 8. Design Emissions Characteristics of DLN-2.6

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

The graphs in Figures 9 and 10 are from a GE publication and provide NO_x and CO data from actual installations or possibly test facilities. These graphs suggest that actual emissions using the DLN-2.6 technology are actually less than the design values shown in Figure 8. The data plots also suggest that there is a possibility of turndown to values somewhat less than 50% of full load without excessive emissions.

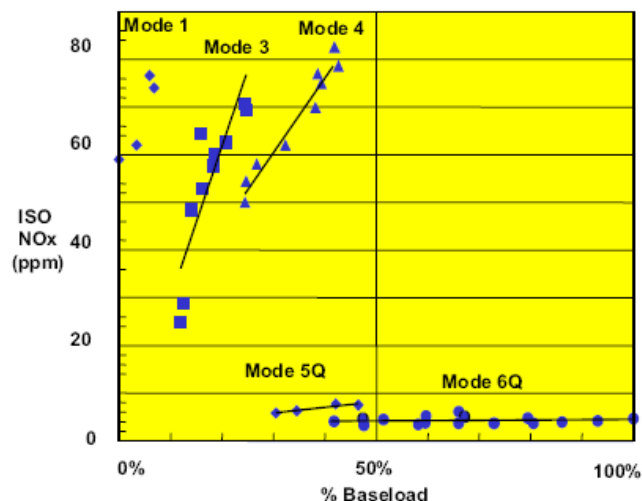


Figure 9. NO_x Emissions from DLN-2.6

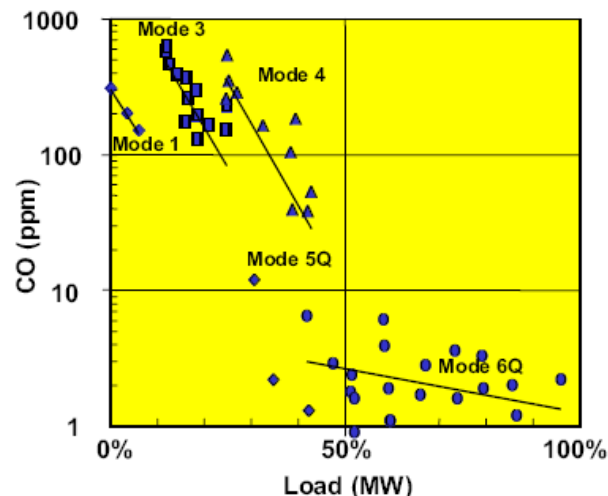


Figure 10. CO Emissions from DLN-2.6

Following are the results of the new and clean tests conducted on a dual-fuel GE 7FA combustion turbine operating in combined cycle mode and burning natural gas at the City of Tallahassee Purdom Station Unit 8.¹ The DLN 2-6 combustors for this project were guaranteed to achieve 9 ppmvd @15% O₂ of NO_x while burning natural gas.

Table 5 – City of Tallahassee Purdom Power Plant (Station Unit 8) Test Results

<u>% of Full Load</u>	<u>NO_x (ppmvd @15% O₂)</u>	<u>CO (ppmvd)</u>
70	7.2	Not Provided
80	6.1	Not Provided
90	6.6	Not Provided
100	8.7	0.85

Following are the results of the new and clean tests conducted on a GE PG7241FA combustion turbine operating in simple cycle mode and burning natural gas at the Tampa Electric Polk Power Station.²

Table 6 – Tampa Electric Polk Power Station Emission Test Results

<u>% of Full Load</u>	<u>NO_x (ppmvd @15% O₂)</u>	<u>CO (ppmvd)</u>	<u>VOC (ppmvd)</u>
50	5.3	1.6	0.5
70	6.3	0.5	0.4
85	6.2	0.4	0.2
100	7.6	0.3	0.1

The test results at the Tallahassee and TECO projects confirm NO_x, CO, and VOC emissions less than the emission characteristics published by GE in Figure 8 above and in line with the actual performance diagrams in Figures 9 and 10.

PART 98—MANDATORY GREENHOUSE GAS REPORTING

Subpart C—General Stationary Fuel Combustion Sources

Table C-1 of Subpart C—Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel

Fuel Type	Default High Heat Value	Default CO₂ Emission Factor
Coal and Coke	mmBtu/short ton	kg CO₂ /mmBtu
Anthracite	25.09	103.54
Bituminous	24.93	93.40
Subbituminous	17.25	97.02
Lignite	14.21	96.36
Coke	24.80	102.04
Mixed (Commercial sector)	21.39	95.26
Mixed (Industrial coking)	26.28	93.65
Mixed (Industrial sector)	22.35	93.91
Mixed (Electric Power sector)	19.73	94.38
Natural Gas	mmBtu/scf	kg CO₂ /mmBtu
Pipeline (Weighted U.S. Average)	1.028 x 10 ⁻³	53.02
Petroleum Products	mmBtu/gallon	kg CO₂ /mmBtu
Distillate Fuel Oil No. 1	0.139	73.25
Distillate Fuel Oil No. 2	0.138	73.96
Distillate Fuel Oil No. 4	0.146	75.04
Residual Fuel Oil No. 5	0.140	72.93
Residual Fuel Oil No. 6	0.150	75.10
Still Gas	0.143	66.72
Kerosene	0.135	75.20
Liquefied petroleum gases (LPG)	0.092	62.98
Propane	0.091	61.46
Propylene	0.091	65.95
Ethane	0.096	62.64
Ethylene	0.100	67.43
Isobutane	0.097	64.91
Isobutylene	0.103	67.74
Butane	0.101	65.15
Butylene	0.103	67.73
Naphtha (<401 deg F)	0.125	68.02
Natural Gasoline	0.110	66.83
Other Oil (>401 deg F)	0.139	76.22
Pentanes Plus	0.110	70.02
Petrochemical Feedstocks	0.129	70.97
Petroleum Coke	0.143	102.41
Special Naphtha	0.125	72.34
Unfinished Oils	0.139	74.49
Heavy Gas Oils	0.148	74.92
Fuel Type	Default High Heat Value	Default CO₂ Emission Factor

Lubricants	0.144	74.27
Motor Gasoline	0.125	70.22
Aviation Gasoline	0.120	69.25
Kerosene-Type Jet Fuel	0.135	72.22
Asphalt and Road Oil	0.158	75.36
Crude Oil	0.138	74.49
Fossil Fuel-derived Fuels (Solid)	mmBtu/short ton	kg CO₂ /mmBtu
Municipal Solid Waste ¹	9.95	90.7
Tires	26.87	85.97
Fossil Fuel-derived Fuels (Gaseous)	mmBtu/scf	kg CO₂ /mmBtu
Blast Furnace Gas	0.092 x 10 ⁻³	274.32
Coke Oven Gas	0.599 x 10 ⁻³	46.85
Biomass Fuels - Solid	mmBtu/short Ton	kg CO₂ /mmBtu
Wood and Wood Residuals	15.38	93.80
Agricultural Byproducts	8.25	118.17
Peat	8.00	111.84
Solid Byproducts	25.83	105.51
Biomass Fuels - Gaseous	mmBtu/scf	kg CO₂ /mmBtu
Biogas (Captured methane)	0.841 x 10 ⁻³	52.07
Biomass Fuels - Liquid	mmBtu/gallon	kg CO₂ /mmBtu
Ethanol (100%)	0.084	68.44
Biodiesel (100%)	0.128	73.84
Rendered Animal Fat	0.125	71.06
Vegetable Oil	0.120	81.55

¹ Allowed only for units that do not generate steam and use Tier 1.

Table C-2 of Subpart C—Default CH₄ and N₂O Emission Factors for Various Types of Fuel.

Fuel Type	Default CH₄ Emission Factor (kg CH₄ /mmBtu)	Default N₂O Emission Factor (kg N₂O/mmBtu)
Coal and Coke (All fuel types in Table C-1)	1.1×10^{-2}	1.6×10^{-3}
Natural Gas	1.0×10^{-3}	1.0×10^{-4}
Petroleum (All fuel types in Table C-1)	3.0×10^{-3}	6.0×10^{-4}
Municipal Solid Waste	3.2×10^{-2}	4.2×10^{-3}
Tires	3.2×10^{-2}	4.2×10^{-3}
Blast Furnace Gas	2.2×10^{-5}	1.0×10^{-4}
Coke Oven Gas	4.8×10^{-4}	1.0×10^{-4}
Biomass Fuels - Solid (All fuel types in Table C-1)	3.2×10^{-2}	4.2×10^{-3}
Biogas	3.2×10^{-3}	6.3×10^{-4}
Biomass Fuels - Liquid(All fuel types in TableC-1)	1.1×10^{-3}	1.1×10^{-4}

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy Industry” or “Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1 g ofCH₄/MMBtu.

¹Allowed only for units that do not generate steam and use Tier 1.

3.12 Table: Pollutant Code Value

Code Value Tables

Data for this Report is One Day Old Production Data.

Pollutant Code:

POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
CO	42101	CO	630-08-0	Carbon Monoxide	-	5	CO	-	-
CPM	-	-	-	Condensable Particulate Matter	N	-	PM-CON	-	-
D/F	-	-	-	Dioxin/Furan	-	-	600	-	-
DIOX	17902	-	-	Dioxin/Furan	-	-	136677093	Individ. Isomers Reported {PCDDs}"	7/17/2008
F001	43503	ACETA	75-07-0	Acetaldehyde	-	-	75070	Acetaldehyde	-
F002	43206	ACETY	74-86-2	Acetylene	-	-	-	-	-
F003	-	-	598-73-2	Bromotrifluorethylene	-	-	-	-	-
F004	43218	13BUD	106-99-0	1,3-Butadiene	-	-	106990	"1,3-Butadiene"	-
F005	43212	NBUTA	106-97-8	Butane	-	-	-	-	-
F006	43280	1BUTE	106-98-9	1-Butene	-	-	-	-	-
F007	-	-	107-01-7	2-Butene	-	-	-	-	-
F008	43281	HC12	25167-67-3	Butene	-	-	-	-	-
F009	43217	C2RTE	590-18-1	2-Butene-cis	-	-	-	-	-
F010	43216	T2BTE	624-64-6	2-Butene-trans	-	-	-	-	-
F011	43933	HC340	463-58-1	Carbon oxysulfide	-	-	463581	Carbonyl Sulfide	-
F012	-	-	7791-21-1	Chlorine monoxide	-	-	-	-	-
F013	-	-	557-98-2	2-Chloropropylene	-	-	-	-	-
F014	-	-	590-21-6	1-Chloropropylene	-	-	-	-	-
F015	-	-	460-19-5	Cyanogen	-	-	-	-	-
F016	-	-	75-19-4	Cyclopropane	-	-	-	-	-
F017	-	-	4109-96-0	Dichlorosilane	-	-	-	-	-
F018	-	-	75-37-6	Difluoroethane	-	-	-	-	-
F019	43735	HC295	124-40-3	Dimethylamine	-	-	-	-	-
F020	-	-	463-82-1	2,2-Dimethylpropane	-	-	-	-	-
F021	43202	ETHAN	74-84-0	Ethane	-	-	-	-	-
F022	-	-	107-00-6	Ethyl acetylene	-	-	-	-	-
F023	43721	HC291	75-04-7	Ethylamine	-	-	-	-	-
F024	43812	CLEHN	75-00-3	Ethyl chloride	-	-	75003	Ethyl Chloride	-
F025	43203	ETHYL	74-85-1	Ethylene	-	-	-	-	-
F026	43351	HC224	60-29-7	Ethyl ether	-	-	-	-	-
F027	43902	HC325	75-08-1	Ethyl mercaptan	-	-	-	-	-
F028	-	-	109-95-5	Ethyl nitrite	-	-	-	-	-
F029	-	-	1333-74-0	Hydrogen	-	-	-	-	-
F030	43214	ISBTA	75-28-5	Isobutane	-	-	-	-	-
F031	43221	ISPNA	78-78-4	Isopentane	-	-	-	-	-
F032	43243	ISPNE	78-79-5	Isoprene	-	-	-	-	-

3.12 Table: Pollutant Code Value

POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
F033	-	-	75-31-0	Isopropylamine	-	-	-	-	-
F034	-	-	75-29-6	Isopropyl chloride	-	-	-	-	-
F035	43201	CH4	74-82-8	Methane	-	-	CH4	-	-
F036	43720	HC290	74-89-5	Methylamine	-	-	-	-	-
F037	43282	3M1BE	563-45-1	3-Methyl-1-butene	-	-	-	-	-
F038	43225	HC174	563-46-2	2-Methyl-1-butene	-	-	-	-	-
F039	43350	HC223	115-10-6	Methyl ether	-	-	-	-	-
F040	43430	HC248	107-31-3	Methyl formate	-	-	-	-	-
F041	-	-	115-11-7	2-Methylpropene	-	-	-	-	-
F042	-	-	504-60-9	1,3-Pentadinene	-	-	-	-	-
F043	43220	NPNTA	109-66-0	Pentane	-	-	-	-	-
F044	43224	1PNTE	109-67-1	1-Pentene	-	-	-	-	-
F045	43226	T2PNE	646-04-8	2-Pentene, (E)-	-	-	-	-	-
F046	43227	C2PNE	627-20-3	2-Pentene, (Z)-	-	-	-	-	-
F047	-	-	463-49-0	Propadiene	-	-	-	-	-
F048	43204	PROPA	74-98-6	Propane	-	-	-	-	-
F049	43205	PRPYL	115-07-1	Propylene	-	-	-	-	-
F050	43144	HC402	74-99-7	Propyne	-	-	-	-	-
F051	-	-	7803-62-5	Silane	-	-	-	-	-
F052	-	-	116-14-3	Tetrafluoroethylene	-	-	-	-	-
F053	-	-	75-76-3	Tetramethylsilane	-	-	-	-	-
F054	-	-	10025-78-2	Trichlorosilane	-	-	-	-	-
F055	-	-	79-38-9	Trifluorochloroethylene	-	-	-	-	-
F056	43740	HC300	75-50-3	Trimethylamine	-	-	-	-	-
F057	-	-	689-97-4	Vinyl acetylene	-	-	-	-	-
F058	43860	VC	75-01-4	Vinyl chloride	-	-	75014	Vinyl Chloride	-
F059	-	-	109-92-2	Vinyl ethyl ether	-	-	-	-	-
F060	-	-	75-02-5	Vinyl fluoride	-	-	-	-	-
F061	43826	2CLET	75-35-4	Vinylidene chloride	-	-	75354	Vinylidene Chloride	-
F062	-	-	75-38-7	Vinylidene fluoride	-	-	-	-	-
F063	-	-	107-25-5	Vinyl methyl ether	-	-	-	-	-
FL	12202	FL	-	Fluorides - Total (elemental fluorine and fluoride compounds)	-	-	-	-	-
H001	43503	ACETA	75-07-0	Acetaldehyde	Y	0.5	75070	Acetaldehyde	-
H002	16717	-	60-35-5	Acetamide	Y	0.5	60355	Acetamide	-
H003	43702	HC288	75-05-8	Acetonitrile	Y	0.5	75058	Acetonitrile	-
H004	16526	-	98-86-2	Acetophenone	Y	0.5	98862	Acetophenone	-
H005	17154	-	53-96-3	2-Acetylaminofluorene	Y	0.5	53963	2-Acetylaminofluorene	-
H006	43505	HC33	107-02-8	Acrolein	Y	0.5	107028	Acrolein	-
H007	16718	-	79-06-1	Acrylamide	Y	0.5	79061	Acrylamide	-

3.12 Table: Pollutant Code Value

POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
H008	16425	-	79-10-7	Acrylic acid	Y	0.5	79107	Acrylic Acid	-
H009	43704	ACRNT	107-13-1	Acrylonitrile	Y	0.5	107131	Acrylonitrile	-
H010	43335	3CLPR	107-05-1	Allyl chloride	Y	0.5	107051	Allyl Chloride	-
H011	17719	-	92-67-1	4-Aminobiphenyl	Y	0.5	92671	4-Aminobiphenyl	-
H012	45701	HC380	62-53-3	Aniline	Y	0.5	62533	Aniline	-
H013	17343	-	90-04-0	o-Anisidine	Y	0.5	90040	o-Anisidine	-
H014	92102	SBC	-	Antimony Compounds	Y	0.5	7440360	Antimony & Compounds	-
H015	92103	ASC	-	Arsenic Compounds (inorganic including arsine)	Y	0.5	7440382	Arsenic & Compounds (Inorganic Including Arsine)	-
H016	12803	AB	1332-21-4	Asbestos	Y	0.5	1332214	Asbestos	-
H017	45201	BZ	71-43-2	Benzene (including benzene from gasoline)	Y	0.5	71432	Benzene	-
H018	17715	-	92-87-5	Benzidine	Y	0.5	92875	Benzidine	-
H019	17834	-	98-07-7	Benzotrichloride	Y	0.5	98077	Benzotrichloride	-
H020	45809	HC102	100-44-7	Benzyl chloride	Y	0.5	100447	Benzyl Chloride	-
H021	12105	BEC	-	Beryllium Compounds	Y	0.5	7440417	Beryllium & Compounds	-
H022	45301	-	92-52-4	Biphenyl	Y	0.5	92524	Biphenyl	-
H023	16455	-	117-81-7	Bis(2-ethylhexyl)phthalate (DEHP)	Y	0.5	117817	Bis(2-Ethylhexyl)Phthalate	-
H024	16364	-	542-88-1	Bis(chloromethyl)ether	Y	0.5	542881	Bis(Chloromethyl)Ether	-
H025	43806	HC47	75-25-2	Bromoform	Y	0.5	75252	Bromoform	-
H026	43218	HC4	106-99-0	1,3-Butadiene	Y	0.5	106990	"1,3-Butadiene"	-
H027	12110	CDC	-	Cadmium Compounds	Y	0.5	7440439	Cadmium & Compounds	-
H028	53503	-	156-62-7	Calcium cyanamide	Y	0.5	156627	Calcium Cyanamide	-
H029	16465	-	105-60-2	Caprolactam	Y	0.5	-	-	-
H030	53401	-	133-06-2	Captan	Y	0.5	133062	Captan	-
H031	51506	-	63-25-2	Carbaryl	Y	0.5	63252	Carbaryl	-
H032	42153	CS2	75-15-0	Carbon disulfide	Y	0.5	75150	Carbon Disulfide	-
H033	43804	HC46	56-23-5	Carbon tetrachloride	Y	0.5	56235	Carbon Tetrachloride	-
H034	43933	HC340	463-58-1	Carbonyl sulfide	Y	0.5	463581	Carbonyl Sulfide	-
H035	17317	-	120-80-9	Catechol	Y	0.5	120809	Catechol	-
H036	51119	-	133-90-4	Chloramben	Y	0.5	133904	Chloramben	-
H037	51104	-	57-74-9	Chlordane	Y	0.5	57749	Chlordane	-
H038	42215	CL	7782-50-5	Chlorine	Y	0.5	7782505	Chlorine	-
H039	16411	-	79-11-8	Chloroacetic acid	Y	0.5	79118	Chloroacetic Acid	-
H040	16527	-	532-27-4	2-Chloroacetophenone	Y	0.5	532274	2-Chloroacetophenone	-
H041	45801	CLBZ	108-90-7	Chlorobenzene	Y	0.5	108907	Chlorobenzene	-
H042	52202	-	510-15-6	Chlorobenzilate	Y	0.5	510156	Chlorobenzilate	-
H043	43803	CLFM	67-66-3	Chloroform	Y	0.5	67663	Chloroform	-
H044	16365	-	107-30-2	Chloromethyl methyl ether	Y	0.5	107302	Chloromethyl Methyl Ether	-
H045	43835	CLPRE	126-99-8	Chloroprene	Y	0.5	126998	Chloroprene	-

3.12 Table: Pollutant Code Value

POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
H046	92115	CRC	-	Chromium Compounds	Y	0.5	7440473	Chromium & Compounds	-
H047	12113	COC	-	Cobalt Compounds	Y	0.5	7440484	Cobalt & Compounds	-
H048	17200	CE	-	Coke Oven Emissions	Y	0.5	-	-	-
H049	17320	-	1319-77-3	Cresols/Cresylic acid (isomers and mixture)	Y	0.5	1319773	Cresol	-
H050	17301	-	95-48-7	o-Cresol	Y	0.5	95487	o-Cresol	-
H051	17302	-	108-39-4	m-Cresol	Y	0.5	108394	m-Cresol	-
H052	17303	-	106-44-5	p-Cresol	Y	0.5	106445	p-Cresol	-
H053	45210	ISPBZ	98-82-8	Cumene	Y	0.5	98828	Cumene	-
H054	12349	CNC	-	Cyanide Compounds	Y	0.5	57125	Cyanide & Compounds	-
H055	54103	24D+	94-75-7	2,4-D, salts and esters	Y	0.5	94757	"2,4-Dichlorophenoxy Acetic Acid"	-
H056	51118	-	72-55-9	DDE	Y	0.5	72559	Bis(p-Chlorophenyl Ethylene)"	-
H057	16229	-	334-88-3	Diazomethane	Y	0.5	334883	Diazomethane	-
H058	18202	-	132-64-9	Dibenzofurans	Y	0.5	132649	Dibenzofuran	-
H059	51623	-	96-12-8	1,2-Dibromo-3-chloropropane	Y	0.5	96128	"1,2-Dibromo-3-Chloropropane"	-
H060	43455	-	84-74-2	Dibutylphthalate	Y	0.5	84742	Dibutyl Phthalate	-
H061	45807	HC100	106-46-7	1,4-Dichlorobenzene(p)	Y	0.5	106467	"1,4-Dichlorobenzene"	-
H062	17716	DCB	91-94-1	3,3-Dichlorobenzidene	Y	0.5	91941	"3,3'-Dichlorobenzidene"	-
H063	43352	HC225	111-44-4	Dichloroethyl ether (Bis(2-chloroethyl)ether)	Y	0.5	111444	Dichloroethyl Ether	-
H064	16817	-	542-75-6	1,3-Dichloropropene	Y	0.5	542756	"1,3-Dichloropropene"	-
H065	51307	-	62-73-7	Dichlorvos	Y	0.5	62737	Dichlorvos	-
H066	16709	-	111-42-2	Diethanolamine	Y	0.5	111422	Diethanolamine	-
H067	17720	-	121-69-7	N,N-Diethyl aniline (N,N-Dimethylaniline)	Y	0.5	121697	"N,N-Dimethylaniline"	-
H068	16909	-	64-67-5	Diethyl sulfate	Y	0.5	64675	Diethyl Sulfate	-
H069	17721	-	119-90-4	3,3-Dimethoxybenzidine	Y	0.5	119904	"3,3'-Dimethoxybenzidine"	-
H070	17722	-	60-11-7	Dimethyl aminoazobenzene	Y	0.5	60117	Dimethylaminoazobenzene	-
H071	17723	-	119-93-7	3,3-Dimethyl benzidine	Y	0.5	119937	"3,3'-Dimethylbenzidine"	-
H072	16825	-	79-44-7	Dimethyl carbamoyl chloride	Y	0.5	79447	Dimethylcarbamoyl Chloride	-
H073	43454	DMTMD	68-12-2	Dimethyl formamide	Y	0.5	68122	"N,N-Dimethylformamide"	-
H074	16230	-	57-14-7	1,1-Dimethyl hydrazine	Y	0.5	57147	"1,1-Dimethyl Hydrazine"	-
H075	43519	-	131-11-3	Dimethyl phthalate	Y	0.5	131113	Dimethyl Phthalate	-
H076	16231	-	77-78-1	Dimethyl sulfate	Y	0.5	77781	Dimethyl Sulfate	-
H077	17322	DOC+	534-52-1	4,6-Dinitro-o-cresol, and salts	Y	0.5	534521	"4,6-Dinitro-o-Cresol"	-
H078	17313	-	51-28-5	2,4-Dinitrophenol	Y	0.5	51285	"2,4-Dinitrophenol"	-
H079	17724	-	121-14-2	2,4-Dinitrotoluene	Y	0.5	121142	"2,4-Dinitrotoluene"	-
H080	46201	HC104	123-91-1	1,4-Dioxane (1,4-Diethyleneoxide)	Y	0.5	123911	p-Dioxane	-
H081	16232	-	122-66-7	1,2-Diphenylhydrazine	Y	0.5	122667	"1,2-Diphenylhydrazine"	-
H082	16901	-	106-89-8	Epichlorohydrin (1-Chloro-2,3-epoxypropane)	Y	0.5	106898	"1-Chloro-2,3-Epoxypropane"	-
H083	16601	-	106-88-7	1,2-Epoxybutane	Y	0.5	106887	"1,2-Epoxybutane"	-

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POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
H084	43438	ETHRY	140-88-5	Ethyl acrylate	Y	0.5	140885	Ethyl Acrylate	-
H085	45203	EBENZ	100-41-4	Ethyl benzene	Y	0.5	100414	Ethyl Benzene	-
H086	16233	-	51-79-6	Ethyl carbamate (Urethane)	Y	0.5	51796	Ethyl Carbamate Chloride	-
H087	43812	CLEHN	75-00-3	Ethyl chloride (Chloroethane)	Y	0.5	75003	Ethyl Chloride	-
H088	43843	HC76	106-93-4	Ethylene dibromide (Dibromoethane)	Y	0.5	106934	Ethylene Dibromide	-
H089	43815	ETHCL	10706-2	Ethylene dichloride (1,2-Dichloroethane)	Y	0.5	107062	Ethylene Dichloride	-
H090	43370	ETGYL	107-21-1	Ethylene glycol	Y	0.5	107211	Ethylene Glycol	-
H091	43773	HC41	151-56-4	Ethylene imine (Aziridine)	Y	0.5	151564	Ethyleneimine	-
H092	43601	EO	75-21-8	Ethylene oxide	Y	0.5	75218	Ethylene Oxide	-
H093	16719	-	96-45-7	Ethylene thiourea	Y	0.5	96457	Ethylene Thiourea	-
H094	43813	HC50	75-34-3	Ethylidene dichloride (1,1-Dichloroethane)	Y	0.5	75343	Ethylidene Dichloride	-
H095	43502	FORM	50-00-0	Formaldehyde	Y	0.5	50000	Formaldehyde	-
H096	16363	GLYET	-	Glycol ethers	Y	0.5	171	Glycol Ethers	-
H097	51109	-	76-44-8	Heptachlor	Y	0.5	76448	Heptachlor	-
H098	17804	CLB4	118-74-1	Hexachlorobenzene	Y	0.5	118741	Hexachlorobenzene	-
H099	43844	HC77	87-68-3	Hexachlorobutadiene	Y	0.5	87683	Hexachlorobutadiene	-
H100	16826	-	77-47-4	Hexachlorocyclopentadiene	Y	0.5	77474	Hexachlorocyclopentadiene	-
H101	16807	-	67-72-1	Hexachloroethane	Y	0.5	67721	Hexachloroethane	-
H102	16714	-	822-06-0	Hexamethylene-1,6-diisocyanate	Y	0.5	822060	Hexamethylene Diisocyanate	-
H103	16720	-	680-31-9	Hexamethylphosphoramide	Y	0.5	680319	Hexamethylphosphoramide	-
H104	43231	NHEXA	110-54-3	Hexane	Y	0.5	110543	Hexane	-
H105	42606	HYDRZ	302-01-2	Hydrazine	Y	0.5	302012	Hydrazine	-
H106	42302	HCL	7647-01-0	Hydrogen chloride (Hydrochloric acid)	Y	0.5	7647010	Hydrochloric Acid	-
H107	42303	HF	7664-39-3	Hydrogen fluoride (Hydrofluoric acid)	Y	0.5	7664393	Hydrogen Fluoride	-
H108	17316	-	123-31-9	Hydroquinone	Y	0.5	123319	Hydroquinone	-
H109	16914	-	78-59-1	Isophorone	Y	0.5	78591	Isophorone	-
H110	92128	PBC	-	Lead Compounds	-	0.5	7439921	-	-
H111	51110	HCCH	58-89-9	Lindane (all isomers)	Y	0.5	58899	"1,2,3,4,5,6-Hexachlorocyclohexane"	-
H112	16452	-	108-31-6	Maleic anhydride	Y	0.5	108316	Maleic Anhydride	-
H113	92132	MNC	-	Manganese Compounds	Y	0.5	7439965	Manganese & Compounds	-
H114	92142	HGC	-	Mercury Compounds	Y	0.5	7439976	Mercury & Compounds	-
H115	43301	MTHOL	67-56-1	Methanol	Y	0.5	67561	Methanol	-
H116	51206	-	72-43-5	Methoxychlor	Y	0.5	72435	Methoxychlor	-
H117	43819	HC55	74-83-9	Methyl bromide (Bromomethane)	Y	0.5	74839	Methyl Bromide	-
H118	43801	CLMT	74-87-3	Methyl chloride (Chloromethane)	Y	0.5	74873	Methyl Chloride	-
H119	43814	TCA	71-55-6	Methyl chloroform (1,1,1-Trichloroethane)	Y	0.5	71556	Methyl Chloroform	-
H120	43552	MTETN	78-93-3	Methyl ethyl ketone (2-Butanone)	-	0.5	-	Methyl Ethyl Ketone	-
H121	16234	-	60-34-4	Methyl hydrazine	Y	0.5	60344	Methylhydrazine	-
H122	43808	HC317	74-88-4	Methyl iodide (Iodomethane)	Y	0.5	74884	Methyl Iodide	-

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H123	16520	-	108-10-1	Methyl isobutyl ketone (Hexone)	Y	0.5	108101	Methyl Isobutyl Ketone	-
H124	16235	-	624-83-9	Methyl isocyanate	Y	0.5	624839	Methyl Isocyanate	-
H125	43441	MTMR	80-62-6	Methyl methacrylate	Y	0.5	80626	Methyl Methacrylate	-
H126	43372	MTBE	1634-04-4	Methyl tert butyl ether	Y	0.5	1634044	Methyl Tert-Butyl Ether	-
H127	17718	CURNE	101-14-4	4,4-Methylene bis (2-chloroaniline)	Y	0.5	101144	"4,4'-Methylenebis(2-Chloraniline)"	-
H128	43802	MC	75-09-2	Methylene chloride (Dichloromethane)	Y	0.5	75092	Methylene Chloride	-
H129	45732	-	101-68-8	Methylene diphenyl diisocyanate (MDI)	Y	0.5	101688	"4,4'-Methylenediphenyl Diisocyanate"	-
H130	45704	-	101-77-9	4,4-Methylenedianiline	Y	0.5	101779	"4,4'-Methylenedianiline"	-
H131	11117	FMF	-	Mineral fibers (fine)	Y	0.5	383	Fine Mineral Fibers	-
H132	17141	PAH1	91-20-3	Naphthalene	Y	0.5	91203	Naphthalene	-
H133	92136	NIC	-	Nickel Compounds	Y	0.5	7440020	Nickel & Compounds	-
H134	45705	-	98-95-3	Nitrobenzene	Y	0.5	98953	Nitrobenzene	-
H135	17323	-	92-93-3	4-Nitrobiphenyl	Y	0.5	92933	4-Nitrobiphenyl	-
H136	17312	-	100-02-7	4-Nitrophenol	Y	0.5	100027	4-Nitrophenol	-
H137	43756	HC309	79-49-6	2-Nitropropane	Y	0.5	79469	2-Nitropropane	-
H138	16721	-	684-93-5	N-Nitroso-N-methylurea	Y	0.5	684935	N-Nitroso-N-Methylurea	-
H139	16722	-	62-75-9	N-Nitrosodimethylamine	Y	0.5	62759	N-Nitrosodimethylamine	-
H140	16723	-	59-89-2	N-Nitrosomorpholine	Y	0.5	59892	N-Nitrosomorpholine	-
H141	51421	-	56-38-2	Parathion	Y	0.5	56382	Parathion	-
H142	17725	-	82-68-8	Pentachloronitrobenzene (Quintobenzene)	Y	0.5	82688	Pentachloronitrobenzene	-
H143	17808	CLP8	87-86-5	Pentachlorophenol	Y	0.5	87865	Pentachlorophenol	-
H144	45300	PHNL	108-95-2	Phenol	Y	0.5	108952	Phenol	-
H145	17704	-	106-50-3	p-Phenylenediamine	Y	0.5	106503	p-Phenylenediamine	-
H146	43850	HC322	75-44-5	Phosgene	Y	0.5	75445	Phosgene	-
H147	42609	-	7803-51-2	Phosphine	Y	0.5	7803512	Phosphine	-
H148	12152	P-PT	7723-14-0	Phosphorus	Y	0.5	7723140	Phosphorus	-
H149	16462	-	85-44-9	Phthalic anhydride	Y	0.5	85449	Phthalic Anhydride	-
H150	17833	-	1336-36-3	Polychlorinated biphenyls (Aroclors)	Y	0.5	1336363	Polychlorinated Biphenyls	-
H151	17199	POM	-	Polycyclic organic matter	Y	0.5	-	Polycyclic Organic Matter	-
H152	16528	-	1120-71-4	1,3-Propane sultone	Y	0.5	1120714	"1,3-Propanesultone"	-
H153	16529	-	57-57-8	beta-Propiolactone	Y	0.5	57578	Beta-Propiolactone	-
H154	43504	HC32	123-38-6	Propionaldehyde	Y	0.5	123386	Propionaldehyde	-
H155	51504	-	114-26-1	Propoxur (Baygon)	Y	0.5	114261	Propoxur	-
H156	43829	HC63	78-87-5	Propylene dichloride (1,2-Dichloropropane)	Y	0.5	78875	Propylene Dichloride	-
H157	43602	HC39	75-56-9	Propylene oxide	Y	0.5	75569	Propylene Oxide	-
H158	16715	-	75-55-8	1,2-Propylenimine (2-Methyl aziridine)	Y	0.5	75558	"1,2-Propylenimine"	-
H159	18105	-	91-22-5	Quinoline	Y	0.5	91225	Quinoline	-
H160	18125	-	106-51-4	Quinone	Y	0.5	106514	Quinone	-
H161	11300	RD	-	Radionuclides (including radon)	Y	0.5	605	Radionuclides (Including Radon)	-
H162	92154	SEC	-	Selenium Compounds	Y	0.5	7782492	Selenium & Compounds	-

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H163	45220	STYR	100-42-5	Styrene	Y	0.5	100425	Styrene	-
H164	17601	-	96-09-3	Styrene oxide	Y	0.5	96093	Styrene Oxide	-
H165	17902	-	1746-01-6	2,3,7,8-Tetrachlorodibenzo-p-dioxin	Y	0.5	1746016	Tetrachlorodibenzo-p-Dioxin"	-
H166	43818	HC54	79-34-5	1,1,2,2-Tetrachloroethane	Y	0.5	79345	"1,1,2,2-Tetrachloroethane"	-
H167	43817	PERC	127-18-4	Tetrachloroethylene (Perchloroethylene)	Y	0.5	127184	Tetrachloroethylene	-
H168	12278	-	7550-45-0	Titanium tetrachloride	Y	0.5	7550450	Titanium Tetrachloride	-
H169	45202	TOLU	108-88-3	Toluene	Y	0.5	108883	Toluene	-
H170	17726	-	95-80-7	2,4-Toluene diamine	Y	0.5	95807	"Toluene-2,4-Diamine"	-
H171	17906	-	584-84-9	2,4-Toluene diisocyanate	Y	0.5	584849	"2,4-Toluene Diisocyanate"	-
H172	17710	-	95-53-4	o-Toluidine	Y	0.5	95534	o-Toluidine	-
H173	51117	-	8001-35-2	Toxaphene (chlorinated camphene)	Y	0.5	8001352	Toxaphene	-
H174	45810	TCBZ	120-82-1	1,2,4-Trichlorobenzene	Y	0.5	120821	"1,2,4-Trichlorobenzene"	-
H175	43820	TCA1	79-00-5	1,1,2-Trichloroethane	Y	0.5	79005	"1,1,2-Trichloroethane"	-
H176	43824	3CLET	79-01-6	Trichloroethylene	Y	0.5	79016	Trichloroethylene	-
H177	17324	-	95-95-4	2,4,5-Trichlorophenol	Y	0.5	95954	"2,4,5-Trichlorophenol"	-
H178	17325	-	88-06-2	2,4,6-Trichlorophenol	Y	0.5	88062	"2,4,6-Trichlorophenol"	-
H179	43741	3ETMN	121-44-8	Triethylamine	Y	0.5	121448	Triethylamine	-
H180	54426	-	1582-09-8	Trifluralin	Y	0.5	1582098	Trifluralin	-
H181	43250	224TM	540-84-1	2,2,4-Trimethylpentane	Y	0.5	540841	"2,2,4-Trimethylpentane"	-
H182	43447	VA	108-05-4	Vinyl acetate	Y	0.5	108054	Vinyl Acetate	-
H183	43861	HC323	593-60-2	Vinyl bromide	Y	0.5	593602	Vinyl Bromide	-
H184	43860	VC	75-01-4	Vinyl chloride	Y	0.5	75014	Vinyl Chloride	-
H185	43826	HC60	75-35-4	Vinylidene chloride (1,1-Dichloroethylene)	Y	0.5	75354	Vinylidene Chloride	-
H186	45102	XYLS	1330-20-7	Xylenes (isomers and mixtures)	Y	0.5	1330207	"Xylenes (Mixture of o, m, and p Isomers)"	-
H187	45204	OXYL	95-47-6	o-Xylenes	Y	0.5	95476	o-Xylene	-
H188	45205	MXYL	108-38-3	m-Xylenes	Y	0.5	108383	m-Xylene	-
H189	45206	PXYL	106-42-3	p-Xylenes	Y	0.5	106423	p-Xylene	-
H2S	42402	H2S	6/4/7783	Hydrogen Sulfide	-	-	7783064	-	-
HAPS	-	-	-	Total Hazardous Air Pollutants	-	1.25	-	-	-
NH3	42604	NH3	7664-41-7	Ammonia	-	-	NH3	-	-
NMOC	-	TNMOC	-	Nonmethane Organic Compounds from MSW Landfill	-	-	-	NONMETHANE ORGANIC COMPOUNDS	-
NOX	42602	NO2	10102-44-0	Nitrogen Oxides	-	5	NOX	(NO2 + NO, EXPRESSED AS THE MOLECULAR	-
PB	12128	PB	-	Lead - Total (elemental lead and lead compounds)	Y	0.25	7439921	Lead & Compounds	-
PM	11101	PT	-	Particulate Matter - Total	-	5	-	FILTERABLE PORTION ONLY"	-
PM10	81102	PM10	-	Particulate Matter - PM10	-	5	PM10-FIL	FILTERABLE PORTION ONLY"	-
PM2.5	-	-	-	Particulate Matter - PM2.5	-	-	PM25-FIL	-	-
RSC	-	-	-	Reduced Sulfur Compounds	-	-	-	-	-
SAM	42306	HSO4	-	Sulfuric Acid Mist	-	-	-	-	-
SO2	42401	SO2	9/5/7446	Sulfur Dioxide	-	5	SO2	-	-

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T001	43505	HC33	107-02-8	Acrolein	-	-	107028	Acrolein	-
T002	43704	ACRNT	107-13-1	Acrylonitrile	-	-	107131	Acrylonitrile	-
T003	95078	-	814-68-6	Acrylyl chloride	-	-	-	-	-
T004	43315	HC219	107-18-6	Allyl alcohol	-	-	-	-	-
T005	-	-	107-11-9	Allylamine	-	-	-	-	-
T008	-	-	7784-34-1	Arsenous trichloride	-	-	-	-	-
T009	16716	-	7784-42-1	Arsine	-	-	-	Arsine	-
T010	95002	-	10294-34-5	Boron trichloride	-	-	-	-	-
T011	12272	-	7/2/7637	Boron trifluoride	-	-	-	-	-
T012	-	-	53-42-4	Boron trifluoride (1:1 methyl ether)	-	-	-	-	-
T013	12109	-	7726-95-6	Bromine	-	-	-	-	-
T014	42153	CS2	75-15-0	Carbon disulfide	-	-	75150	Carbon Disulfide	-
T015	42215	CL	7782-50-5	Chlorine	-	-	7782505	Chlorine	-
T016	12421	-	10049-04-4	Chlorine dioxide	-	-	-	-	-
T017	43803	CLFM	67-66-3	Chloroform	-	-	67663	Chloroform	-
T018	16364	-	542-88-1	Chloromethyl ether	-	-	542881	Bis(Chloromethyl)Ether	-
T019	16365	-	107-30-2	Chloromethyl methyl ether	-	-	107302	Chloromethyl Methyl Ether	-
T020	-	-	4170-30-3	Crotonaldehyde	-	-	-	-	-
T021	43516	HC392	123-73-9	Crotonaldehyde, (E)-	-	-	-	-	-
T022	-	-	506-77-4	Cyanogen chloride	-	-	-	-	-
T023	-	-	108-91-8	Cyclohexylamine	-	-	-	-	-
T024	95136	DBRNE	19287-45-7	Diborane	-	-	-	-	-
T025	-	-	75-78-5	Dimethyldichlorosilane	-	-	-	-	-
T026	16230	-	57-14-7	1,1-Dimethylhydrazine	-	-	57147	"1,1-Dimethyl Hydrazine"	-
T027	16901	-	106-89-8	Epichlorohydrin	-	-	106898	"1-Chloro-2,3-Epoxypropane"	-
T028	43750	HC303	107-15-3	Ethylenediamine	-	-	-	-	-
T029	43773	HC41	151-56-4	Ethyleneimine	-	-	151564	Ethyleneimine	-
T030	43601	HC38	75-21-8	Ethylene oxide	-	-	75218	Ethylene Oxide	-
T031	42222	-	7782-41-4	Fluorine	-	-	-	-	-
T032	43502	FORM	50-00-0	Formaldehyde (solution)	-	-	50000	Formaldehyde	-
T033	43390	HC240	110-00-9	Furan	-	-	-	-	-
T034	42606	HYDRZ	302-01-2	Hydrazine	-	-	302012	Hydrazine	-
T035	-	-	47-01-0	Hydrochloric acid (concn > 30%)	-	-	7647010	Hydrochloric Acid	-
T036	42607	HCN	74-90-8	Hydrocyanic acid	-	-	74908	Hydrogen Cyanide	-
T037	43202	HCL	7647-01-0	Hydrogen chloride (anhydrous)	-	-	7647010	Hydrochloric Acid	-
T038	42303	HF	7664-39-3	Hydrogen fluoride (concn > 50%)	-	-	7664393	Hydrogen Fluoride	-
T039	-	-	7/5/7783	Hydrogen selenide	-	-	-	-	-
T040	42402	H2S	6/4/7783	Hydrogen sulfide	-	-	7783064	-	-
T041	-	-	13463-40-6	Iron, pentacarbonyl-	-	-	-	-	-
T042	-	-	78-82-0	Isobutyronitrile	-	-	-	2-Methyl-Propanenitrile	-

3.12 Table: Pollutant Code Value

POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
T043	95007	-	108-23-6	Isopropyl chloroformate	-	-	-	-	-
T044	-	-	126-98-7	Methacrylonitrile	-	-	-	-	-
T045	43801	CLMT	74-87-3	Methyl chloride	-	-	74873	Methyl Chloride	-
T046	95077	-	79-22-1	Methyl chloroformate	-	-	-	-	-
T047	16234	-	60-34-4	Methyl hydrazine	-	-	60344	Methylhydrazine	-
T048	16235	-	624-83-9	Methyl isocyanate	-	-	624839	Methyl Isocyanate	-
T049	43901	-	74-93-1	Methyl mercaptan	-	-	-	-	-
T050	-	-	556-64-9	Methyl thiocyanate	-	-	-	-	-
T051	-	-	75-79-6	Methyltrichlorosilane	-	-	-	-	-
T052	-	-	13463-39-3	Nickel carbonyl	-	-	-	Nickel Carbonyl	-
T053	42305	HNO3	7697-37-2	Nitric acid (concn > 80%)	-	-	-	-	-
T054	42601	NO	10102-43-9	Nitric oxide	-	-	-	-	-
T055	-	-	8014-95-7	Oleum (fuming sulfuric acid)	-	-	-	-	-
T056	-	-	79-21-0	Peracetic acid	-	-	-	-	-
T057	-	-	94-42-3	Perchloromethylmercaptan	-	-	-	-	-
T058	43850	HC322	75-44-5	Phosgene	-	-	75445	Phosgene	-
T059	42610	-	7803-51-2	Phosphine	-	-	7803512	Phosphine	-
T060	-	-	10025-87-3	Phosphorus oxychloride	-	-	-	Phosphorus Oxychloride	-
T061	-	-	12/2/7719	Phosphorus trichloride	-	-	-	Phosphorus Trichloride	-
T062	-	-	110-89-4	Piperidine	-	-	-	-	-
T063	43703	HC289	107-12-0	Propionitrile	-	-	-	-	-
T064	-	-	109-61-5	Propyl chloroformate	-	-	-	-	-
T065	-	-	75-55-8	Propyleneimine	-	-	75558	"1,2-Propylenimine"	-
T066	43602	HC39	75-56-9	Propylene oxide	-	-	75569	Propylene Oxide	-
T067	42401	SO2	9/5/7446	Sulfur dioxide (anhydrous)	-	-	SO2	-	-
T068	-	-	7783-60-0	Sulfur tetrafluoride	-	-	-	-	-
T069	42407	SO3	11/9/7446	Sulfur trioxide	-	-	-	-	-
T070	-	-	75-74-1	Tetramethyllead	-	-	-	-	-
T071	-	-	509-14-8	Tetranitromethane	-	-	-	-	-
T072	12278	-	7550-45-0	Titanium tetrachloride	-	-	7550450	Titanium Tetrachloride	-
T073	17906	-	584-84-9	Toluene 2,4-diisocyanate	-	-	584849	"2,4-Toluene Diisocyanate"	-
T074	17911	-	91-08-7	Toluene 2,6-diisocyanate	-	-	-	-	-
T075	45731	HC383	26471-62-5	Toluene diisocyanate (unspecified)	-	-	-	-	-
T076	-	-	75-77-4	Trimethylchlorosilane	-	-	-	-	-
T077	43447	VA	108-05-4	Vinyl acetate monomer	-	-	108054	Vinyl Acetate	-
TBAC	-	-	-	t-Butyl Acetate	N	-	-	-	-
TH	-	-	-	Total Halogens	N	-	-	-	-
THC	-	-	-	Total Hydrocarbons (surrogate for organic HAP)	N	-	-	-	-
TRS	43911	TRS	-	Total Reduced Sulfur	-	-	-	-	-

3.12 Table: Pollutant Code Value

POLL CODE	EPA CODE	EPA ABBREV	CAS NO	DESCRIPTION	HAP	THRESHOLD	NEI POL CODE	NEI POL DESCRIPTION	DISCONTINUED
VOC	43104	VOC	-	Volatile Organic Compounds	-	5	VOC	-	-

App Users Report

Application Name: EAOR

User	Role	Level	Status	Office	Division	Oversight
AKINS_W	VIEW ONLY	10	A	SWD	ARM	N
ALI_NR	REVIEWER	50	A	CDOR	ARM	N
ALLEN_TL	VIEW ONLY	10	A	SWPN	ARM	N
ALSOP_P	VIEW ONLY	10	A	TAL	ARM	N
ARD_H	REVIEWER	50	A	NWD	ARM	N
ASCANO_F	REVIEWER	50	A	SWHI	ARM	N
AUSTIN_M	REVIEWER	50	A	SED	WM	N
BAHTIC_N	REVIEWER	50	A	SWD	ARM	N
BARATA_R	REVIEWER	50	A	NED	ARM	N
BARNES_G	REVIEWER	50	A	NEDV	ARM	N
BARTLETT_S	REVIEWER	50	A	NED	ARM	N
BASNET_B	REVIEWER	50	A	SEPB	ARM	N
BEASLEY_AE	REVIEWER	50	A	SWHI	ARM	N
BESSA_T	REVIEWER	50	A	CDOR	ARM	N
BETANCOURT_A	REVIEWER	50	A	SWD	ARM	N
BRICE_SN	QUALITY ASSURANCE	75	A	TAL	ARM	N
BUNDY_I	REVIEWER	50	A	CDOR	ARM	N
CAMERON_S	REVIEWER	50	A	SWSA	ARM	N
CISNEROS_JJ	REVIEWER	50	A	SEBR	ARM	N
COX_DL	REVIEWER	50	A	SWPN	ARM	N
CRAWFORD_C	VIEW ONLY	10	A	SWHI	ARM	N
CULLIVER_S	REVIEWER	50	A	SD	ARM	N
CURLE_M	VIEW ONLY	10	A	NWD	ARM	N
DARM_H	VIEW ONLY	10	A	TAL	ARM	N
DELGADO_F	REVIEWER	50	A	SEDA	ARM	N
DELOSANTOS_M	REVIEWER	50	A	SED	ARM	N
DITTELL_JD	REVIEWER	50	A	CDOR	ARM	N
ENRIQUEZ_Y	REVIEWER	50	A	NED	ARM	N
FAMILIE_B	REVIEWER	50	A	SED	ARM	N
FEHRMANN_EP	REVIEWER	50	A	SWPN	ARM	N
FERNANDEZ_C	VIEW ONLY	10	A	TAL	ARM	N
FERNANDEZ_CV	REVIEWER	50	A	SEBR	ARM	N
FROBERG_WR	REVIEWER	50	A	SWPN	ARM	N
GEORGE_L	VIEW ONLY	10	A	TAL	ARM	N
GIBSON_M	VIEW ONLY	10	A	TAL	OTIS	N

3.12 Web Access Control List

GOLDEN_JE	REVIEWER	50	A	SWHI	ARM	N
GORDON_R	REVIEWER	50	A	SEDA	ARM	N
GRADNEY_N	REVIEWER	50	A	CD	ARM	N
GRIFFIN_T	REVIEWER	50	A	NEDV	WM	N
GRONDAHL_M	REVIEWER	50	A	SWD	ARM	N
HAILEMARIA_A	REVIEWER	50	A	CDOR	ARM	N
HATHAWAY_SR	REVIEWER	50	A	SWHI	ARM	N
HENNIS_M	REVIEWER	50	A	SWPN	ARM	N
HEPPNER_J	REVIEWER	50	A	CDOR	ARM	N
HODGE_C	ADMINISTRATOR	90	A	TAL	ARM	Y
HOEFERT_L	REVIEWER	50	A	SED	ARM	N
HOWES_J	VIEW ONLY	10	A	TAL	ARM	Y
IBARRA_O	REVIEWER	50	A	SEBR	ARM	N
IRIZARRY_M	REVIEWER	50	A	NWD	ARM	N
JACKSON_A	REVIEWER	50	A	NWD	ARM	N
JACKSON_SL	REVIEWER	50	A	SWPN	ARM	N
JAIRAM_S	REVIEWER	50	A	SEBR	ARM	N
JOHNSON_AS	REVIEWER	50	A	SEDA	ARM	N
JORDAHL_C	REVIEWER	50	A	SEDA	ARM	N
KALAMARAS_P	REVIEWER	50	A	SEPB	ARM	N
KASPER_JM	REVIEWER	50	A	CDOR	ARM	N
KNIGHT_N	REVIEWER	50	A	SWD	ARM	N
LANH_K	VIEW ONLY	10	A	TAL	ARM	N
LANH_T	QUALITY ASSURANCE	75	A	TAL	ARM	N
LEE_D	VIEW ONLY	10	A	SWHI	ARM	N
LEWIS_W	REVIEWER	50	A	SD	ARM	N
LIM_M	VIEW ONLY	10	A	NED	TERM	N
LIU_P	REVIEWER	50	A	SWHI	ARM	N
LOBIN_D	REVIEWER	50	A	CDOR	ARM	N
LONG_T	QUALITY ASSURANCE	75	A	TAL	ARM	N
MARCH_MI	REVIEWER	50	A	SEDA	ARM	N
MARTIN_FA	REVIEWER	50	A	SEPB	ARM	N
MARTIN_WR	REVIEWER	50	A	SWPN	ARM	N
MCCANN_M	REVIEWER	50	A	SWPN	ARM	N
MELKONIAN_S	VIEW ONLY	10	A	TAL	ARM	N
MELTON_C	REVIEWER	50	A	NWD	ARM	N
MILLER_R	REVIEWER	50	A	SEPB	ARM	N
MORERA_N	REVIEWER	50	A	SWHI	ARM	N

3.12 Web Access Control List

MORRIS_J	REVIEWER	50	A	SWPN	ARM	N
NASSERI_SN	REVIEWER	50	A	SWHI	WM	N
NOOR_Q	VIEW ONLY	10	A	SWD	ARM	N
NOZARI_M	REVIEWER	50	A	SWHI	ARM	N
PANETTA_J	REVIEWER	50	A	SWD	ARM	N
PARKER_W	REVIEWER	50	A	CD	ARM	N
PENNETTA_A	REVIEWER	50	A	SEBR	ARM	N
PENNINGTON_J	VIEW ONLY	10	A	TAL	ARM	N
PHILLIPS_C	VIEW ONLY	10	A	TAL	ARM	N
PICKERING_MA	REVIEWER	50	A	SWD	ARM	N
PITTERS_C	REVIEWER	50	A	SEBR	ARM	N
PONS_PL	REVIEWER	50	A	SWHI	ARM	N
PORTER_B	VIEW ONLY	10	A	TAL	OTIS	N
PRICE_DJ	REVIEWER	50	A	SWHI	ARM	N
PRUSA_R	REVIEWER	50	A	NWD	ARM	N
RHODES_BM	REVIEWER	50	A	CDOR	ARM	N
RICE_R	REVIEWER	50	A	CD	ARM	N
RICHARDS_J	REVIEWER	50	A	NEDV	ARM	N
ROBINSON_LF	REVIEWER	50	A	SWHI	ARM	N
RODRIGUEZ_A	REVIEWER	50	A	SWHI	ARM	N
RODRIGUEZ_J	REVIEWER	50	A	SWPN	ARM	N
ROGERS_T	VIEW ONLY	10	A	TAL	ARM	N
SARASUA_A	REVIEWER	50	A	NWD	ARM	N
SATYAL_A	REVIEWER	50	A	SD	ARM	N
SCHROEDER_B	REVIEWER	50	A	SWD	ARM	N
SEXTON_W	QUALITY ASSURANCE	75	A	TAL	ARM	N
SHELTON_C	VIEW ONLY	10	A	TAL	OTIS	N
SHELTON_N	VIEW ONLY	10	A	TAL	ARM	N
SHELTON_P	REVIEWER	50	A	SEBR	ARM	N
SHINE_C	REVIEWER	50	A	CD	ARM	N
SIMS_J	VIEW ONLY	10	A	SWHI	ARM	N
SPINGLER_D	VIEW ONLY	10	A	TAL	ARM	N
STEVENS_K	QUALITY ASSURANCE	75	A	TAL	ARM	N
STEWART_RJ	REVIEWER	50	A	SD	ARM	N
STOLL_C	REVIEWER	50	A	NWD	ARM	N
STORINO_MF	REVIEWER	50	A	SWSA	ARM	N
SUSKY_E	REVIEWER	50	A	SEBR	ARM	N
SWANSON_H	REVIEWER	50	A	SWHI	ARM	N

3.12 Web Access Control List

TALLAM_L	REVIEWER	50	A	SEPB	WM	N
TILLEY_L	REVIEWER	50	A	NEDV	ARM	N
WALTRIP_J	REVIEWER	50	A	NWD	ARM	N
WATERS_J	VIEW ONLY	10	A	SWHI	ARM	N
WATERS_K	VIEW ONLY	10	A	TAL	OTIS	N
WATSON_A	VIEW ONLY	10	A	SWHI	ARM	N
WEBB_LA	VIEW ONLY	10	A	SWHI	ARM	N
YOUNG_M	REVIEWER	50	A	CD	ARM	N
ZHU_R	VIEW ONLY	10	A	SWHI	ARM	N
ZHU_Y	ADMINISTRATOR	90	A	TAL	ARM	Y
Total Records Selected - 121						
Total Users Selected - 121						

As of 27 March 2012



Department of Environmental Protection

Division of Air Resource Management

ANNUAL OPERATING REPORT FOR AIR POLLUTANT EMITTING FACILITY

See Instructions for DEP Form No. 62-210.900(5)

I. FACILITY REPORT

A. REPORT INFORMATION

1. Year of Report	2. Number of Emissions Units in Report
-------------------	--

B. FACILITY INFORMATION

1. Facility ID	2. Facility Status	3. Date of Permanent Facility Shutdown
4. Facility Owner/Company Name		
5. Site Name		
6. Facility Location Street Address or Other Locator: City: County: Zip Code:		
7. Governmental Facility Code	8. Facility SIC(s)	
9. Facility Comment		

C. FACILITY HISTORY INFORMATION

1. Change in Facility Owner/Company Name During Year?	Previous Name	2. Date of Change
---	---------------	-------------------

Facility ID:**D. OWNER/CONTACT INFORMATION**

1. Owner or Authorized Representative		
Name and Title		
Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:		
Telephone: () - Fax: () -		
E-mail:		
2. Report Contact		
Name and Title		
Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:		
Telephone: () - Fax: () -		
E-mail:		
3. Facility Contact		
Name and Title		
Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:		
Telephone: () - Fax: () -		
E-mail:		

E. OWNER OR AUTHORIZED REPRESENTATIVE STATEMENT

The information given in this report is correct to the best of my knowledge.	
_____ Signature	_____ Date

Facility ID:**Emissions Unit ID:****II. EMISSIONS UNIT REPORT****A. EMISSIONS UNIT INFORMATION**

1. Emissions Unit Description		
2. Emissions Unit ID	3. Emissions Unit Classification	4. Operated During Year?
5. DEP Permit or PPS Number		6. Emissions Unit Status
7. Emissions Unit Startup Date	8. Long-term Reserve Shutdown Date	9. Permanent Shutdown Date

B. EMISSION POINT/CONTROL INFORMATION

1. Emissions Point Type
2. Description of Control Equipment

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. Average Annual Operation hours/day days/week	2. Total Operation During Year (hours/year)
3. Percent Hours of Operation by Season DJF: MAM: JJA: SON:	
4. Average Summer Season Operation (June 1 to Aug. 31) hours/day days/week	5. Total Operation During Summer Season (days/season)

Facility ID:

Emissions Unit ID:

D. EMISSIONS UNIT COMMENT

Facility ID: _____ **Emissions Unit ID:** _____
Emissions Information by Process/Fuel _____ **of** _____

E. EMISSIONS INFORMATION BY PROCESS/FUEL

(1) PROCESS/FUEL INFORMATION

1. SCC	2. Description of Process or Type of Fuel	
3. Annual Process or Fuel Usage Rate	4. Summer Season Daily Process or Fuel Usage Rate	5. SCC Unit
6. Fuel Average % Sulfur	7. Fuel Average % Ash	8. Fuel Heat Content (mmBtu/SCC Unit)

(2) EMISSIONS INFORMATION

1a. Pollutant 'a'		☐ Below Threshold ☐ Not Emitted	
2a. Annual Emissions (ton/year)	3a. Summer Season Daily Emissions (lb/day)	4a. Emissions Method Code	
5a. Emissions Calculation (Show separately both annual and daily emissions calculations)			
1b. Pollutant 'b'		☐ Below Threshold ☐ Not Emitted	
2b. Annual Emissions (ton/year)	3b. Summer Season Daily Emissions (lb/day)	4b. Emissions Method Code	
5b. Emissions Calculation (Show separately both annual and daily emissions calculations)			
1c. Pollutant 'c'		☐ Below Threshold ☐ Not Emitted	
2c. Annual Emissions (ton/year)	3c. Summer Season Daily Emissions (lb/day)	4c. Emissions Method Code	
5c. Emissions Calculation (Show separately both annual and daily emissions calculations)			

Facility ID: _____ **Emissions Unit ID:** _____
Emissions Information by Process/Fuel _____ **of** _____

Facility ID: _____ **Emissions Unit ID:** _____
Emissions Information by Process/Fuel _____ **of** _____

(2) EMISSIONS INFORMATION (Continued)

1d. Pollutant 'd'		☐ Below Threshold ☐ Not Emitted
2d. Annual Emissions (ton/year)	3d. Summer Season Daily Emissions (lb/day)	4d. Emissions Method Code
5d. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1e. Pollutant 'e'		☐ Below Threshold ☐ Not Emitted
2e. Annual Emissions (ton/year)	3e. Summer Season Daily Emissions (lb/day)	4e. Emissions Method Code
5e. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1f. Pollutant 'f'		☐ Below Threshold ☐ Not Emitted
2f. Annual Emissions (ton/year)	3f. Summer Season Daily Emissions (lb/day)	4f. Emissions Method Code
5f. Emissions Calculation (Show separately both annual and daily emissions calculations)		

1g. Pollutant 'g'		☐ Below Threshold ☐ Not Emitted
2g. Annual Emissions (ton/year)	3g. Summer Season Daily Emissions (lb/day)	4g. Emissions Method Code
5g. Emissions Calculation (Show separately both annual and daily emissions calculations)		

**Department of Environmental Protection
Division of Air Resource Management**

**INSTRUCTIONS FOR DEP FORM NO. 62-210.900(5)
ANNUAL OPERATING REPORT FOR AIR POLLUTANT EMITTING FACILITY**

GENERAL INSTRUCTIONS

In accordance with Rule 62-210.370 (3), F.A.C., the Annual Operating Report for Air Pollutant Emitting Facility (DEP form number 62-210.900(5)) shall be completed each year for the following facilities:

1. All Title V sources.
2. All synthetic non-Title V sources.
3. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
4. All facilities for which an annual operating report is required by rule or permit.

Notwithstanding the above, no annual operating report shall be required for any facility operating under an air general permit.

The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the department's Electronic Annual Operating Report (EAOR) software, there is no requirement to submit a copy to the DEP district or local air program office.

Section I of DEP form number 62-210.900(5), Facility Report, must be submitted for each air pollutant emitting facility required to file the form, including any facility which was on cold standby or otherwise did not operate during the year for which data are being reported (the "reporting year"). Section I of the form should also be submitted for any facility that was permanently shut down during the reporting year.

Section II of DEP form number 62-210.900(5), Emissions Unit Report, must be submitted annually for each reportable emissions unit within the facility, including any such emissions unit which operated part of the year but was permanently shut down during the reporting year.

The terms "facility" and "emissions unit," and other technical and regulatory terms that appear in these instructions, have the meanings ascribed to them in Rule 62-210.200, F.A.C.

The department strongly encourages facilities to complete and submit the annual operating report electronically using the department's EAOR software, available for download at www.dep.state.fl.us/air. The EAOR software partially prefills the form with data from the department's Air Resources Management System (ARMS) that are not expected to change from year to year. The owner or operator is expected to enter data specific to the reporting year (e.g., actual process/fuel usage rates and pollutant emissions) and correct any errors or omissions in the

prefilled ARMS data. In the case of any prefilled data element, the term "enter" as it appears in these instructions should be read to mean "verify." The electronic report shall be submitted to the department following directions for use of the EAOR software.

The department will also accept hardcopy reports submitted using a computer-generated, partially prefilled form. Hardcopy reports shall be submitted to the appropriate DEP district or DEP-approved local air pollution control program office.

The department will post procedures for obtaining the latest version of the EAOR software or a computer-generated, partially prefilled hardcopy form on its website at www.dep.state.fl.us/air.

I. FACILITY REPORT

A. REPORT INFORMATION

1. **Year of Report** - Enter the year of the data given in this report (the "reporting year").
2. **Number of Emissions Units in Report** - Enter the number of emissions units included in this report. A separate Section II of the form must be completed for each reportable emissions unit at the facility. See Section II of the instructions for additional information on the reporting of emissions units.

B. FACILITY INFORMATION

1. **Facility ID** - If known, enter the DEP seven-digit facility identification number.
2. **Facility Status** - Enter, from the list below, the facility status code valid as of December 31 of the reporting year.

<u>Code</u>	<u>Status</u>
A	Active - One or more emissions units in operation, on standby status, temporarily shut down (including any shutdown while undergoing modification), or on long-term reserve shutdown. This code indicates an existing facility which has not been permanently shut down, though it may not be operating at the time of this report.
C	Construction - All emissions units in planning stage or undergoing initial construction, including reconstruction. This code indicates a proposed new facility, or an existing facility which has been or will be shut down in its entirety for reconstruction.
I	Inactive - All emissions units permanently shutdown; permit(s) surrendered or expired.

3. **Date of Permanent Facility Shutdown** - If the facility was permanently shut down during the reporting year, enter the date of cessation of all operations.
4. **Facility Owner/Company Name** - Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility. Common abbreviations should be used with blanks left between each word to insure readable entries (e.g., Fla. Electric Co., U.S. Pulp Inc., Dept. of Health, etc.).

5. **Site Name** - Enter the common name, if any, of the facility site addressed in this report (e.g., Okeechobee Plant, Fernandina Mill, Fla. State Hospital, etc.). Also use this field to enter any alias name under which the corporate owner of the facility is doing business at this facility location.
6. **Facility Location**
- Street Address or Other Locator** - Enter the street address or approximate location of the facility as shown on a road map. This may be an intersection description or any locator which will allow a person unfamiliar with the facility to determine its physical location (e.g., 3 mi. W. of U.S. 41 off S.R. 786; etc.). For relocatable facilities, enter the current location.
- City** - Enter the name of the city in which the facility is located. If the facility is not located within city limits, enter the name of the nearest city preceded by "N. of," "W. of," etc.
- County** - Enter the name of the county in which the facility is located.
- Zip Code** - Enter the five-digit postal zip code of the facility's physical location (not necessarily the mailing address zip code).
7. **Governmental Facility Code** - If the owner or operator of the facility is a unit of government, enter, from the list below, the code for such unit of government. If the owner or operator is not a unit of government, enter "0."
- | <u>Code</u> | <u>Unit of Government</u> |
|-------------|----------------------------------|
| 0 | None (non-governmental facility) |
| 1 | Federal |
| 2 | State |
| 3 | County |
| 4 | Municipality |
8. **Facility SIC(s)** - If known, enter up to three four-digit Standard Industrial Classification (SIC) codes to precisely describe the economic activities of the facility. Four-digit SIC codes are listed in the 1987 Standard Industrial Classification Manual published by the U.S. Office of Management and Budget. If no four-digit code is known, leave blank.
9. **Facility Comment** - Enter any comments about the facility addressed in this report.

C. FACILITY HISTORY INFORMATION

1. **Change in Facility Owner/Company Name During Year?** - If the name of the individual or corporate owner of the facility was changed during the reporting year, enter the name by which the facility was previously known. If the facility also changed ownership during the reporting year and an application for transfer of permit has not been previously submitted, submit such form at this time.
2. **Date of Change** - Enter the date of change of facility owner/company name.

D. OWNER/CONTACT INFORMATION

1. **Owner or Authorized Representative** - Enter all the information requested for the facility's individual owner or for the representative authorized to sign this report for the facility's corporate or governmental owner. In the case of a non-Title V source, this is typically the person to whom the department will direct correspondence related to air pollutant emissions units at the facility. In the case of a Title V source, it is not necessary that this person be a responsible official, but the person must be authorized by the owner or operator of the facility to sign this report. Please provide the nine-digit postal zip code.
2. **Report Contact** - Enter all the information requested for the person to be contacted regarding this annual operating report. If the owner or operator used a consultant to complete this report and has no objection to the department contacting the consultant directly, this person may be that consultant. If this field is left blank, the department will contact the owner or authorized representative identified in Field 1 regarding any questions related to this report.
3. **Facility Contact** - Enter all the information requested for the person to be contacted regarding day-to-day operations of air pollutant emissions units at the facility. This is typically, but not necessarily, a person stationed at or in close proximity to the facility, such as the plant manager or environmental coordinator. This is the person the department will contact for access to the facility to conduct compliance inspections or observe stack tests.

E. OWNER OR AUTHORIZED REPRESENTATIVE STATEMENT

This statement should be signed by the owner or authorized representative named in Field 1 of Subsection I.D. of the form.

II. EMISSIONS UNIT REPORT

A separate Section II of the form (Emissions Unit Report) must be completed for each emissions unit at the facility, except emissions units at non-Title V sources that are exempt from permitting pursuant to Rule 62-4.040 or 62-210.300(3), F.A.C., insignificant emissions units at Title V sources, and units for which emissions reporting is not practical such as units that emit only radionuclides or units that emit only fugitive emissions that are not reasonably quantifiable. Units for which emissions reporting is not required will not appear on the EAOR or prefilled hardcopy of the AOR form. Note: this section of the form must be completed for all "unregulated" emissions units, as defined in the instructions to DEP form number 62-210.900(1), except any such units for which emissions reporting is not practical as set forth above.

An Emissions Unit Report must be completed for any reportable emissions unit that had active status during any part of the reporting year, even if it was permanently shut down during the year. If a reportable emissions unit operated during the reporting year but had no reportable emissions (i.e., no pollutants subject to emission limiting standards and no pollutants emitted at or above threshold levels), only Subsections II.A. through II.E.(1) must be completed.

The most appropriate breakdown of process and production operations, and other pollutant-emitting activities, at a facility into separate emissions units is normally determined through the permitting process and, once established, shall be adhered to in completing this report. Permitting offices may establish separate "emissions units" solely for the purpose of reporting

emissions on the annual operating report, especially fugitive emissions. For example, an emissions unit may be defined as representing facility-wide fugitive emissions resulting from equipment leaks or maintenance painting. Similarly, an emissions unit may be defined as representing those emissions that escape capture by a primary emissions unit's vent hood and are released directly to the atmosphere without passing through the primary unit's control equipment. Any questions regarding the manner in which emissions units have been defined by the department should be discussed with the appropriate permitting office.

In the case of a relocatable facility which operated at more than one site during the reporting year, one Section II of the form should be completed for the total operation, for each emissions unit.

A. EMISSIONS UNIT INFORMATION

1. **Emissions Unit Description** - Enter a brief description of the emissions unit addressed in this Emissions Unit Report (i.e., on this Section II of the annual operating report package). Include any unit designations and other information helpful in describing the emissions unit and differentiating it from other emissions units at the facility.
2. **Emissions Unit ID** - If known, enter the DEP three-digit emissions unit identification number assigned by the department to the emissions unit addressed in this report.
3. **Emissions Unit Classification (DEP Use)**
4. **Operated During Year?** - Enter a "Y" if the emissions unit operated during any part of the reporting year (January 1 - December 31); a "N" if it did not. If the emissions unit did not operate, the remaining subsections of the Emissions Unit Report need not be completed.
5. **DEP Permit or PPS Number** - Enter the current DEP air permit number or power plant site certification number applicable to the emissions unit addressed in this report.

Note: In some cases, each emissions unit has a separate permit. Often, however, a single permit addresses more than one emissions unit (e.g., a Title V operation permit). In such case, a separate Emissions Unit Report (Section II) is required for each emissions unit covered by the single permit.

6. **Emissions Unit Status** - Enter, from the list below, the emissions unit status code valid as of December 31 of the reporting year:

<u>Code</u>	<u>Status</u>
A	Active - Emissions unit in operation, on standby status, temporarily shut down (including any shutdown while undergoing modification), or on long-term reserve shutdown. This code indicates an existing emissions unit which has not been permanently shut down, though it may not be operating at the time of this report.
C	Construction - Emissions unit in planning stage or undergoing initial construction; including reconstruction. This code indicates a proposed new emissions unit, or an existing emissions unit which has been or will be shut down in its entirety for reconstruction.

I Inactive - Emissions unit permanently shut down; permit surrendered or expired.

7. **Emissions Unit Startup Date** - If, during the reporting year, the emissions unit commenced operation following construction or reconstruction, enter the startup date. Do not enter, as a startup date, the date on which the emissions unit resumed operations following a temporary shutdown, such as a long-term reserve shutdown. If the emissions unit commenced operation prior to the reporting year but the startup date is missing, enter the startup date, if known.
8. **Long-term Reserve Shutdown Date** - If the emissions unit has been placed on long-term reserve shutdown, enter the shutdown date. Do not enter, as a long-term reserve shutdown date, the date on which an emissions unit ceased operations for a planned temporary shutdown period or unplanned outage.
9. **Permanent Shutdown Date** - If during the reporting year the emissions unit ceased operation, other than for an expected temporary period, enter the shutdown date.

B. EMISSION POINT/CONTROL INFORMATION

1. **Emission Point Type** - An emission point is a stack, vent, or other identifiable location at which air pollutants are discharged into the atmosphere. The emissions unit addressed in this Emissions Unit Report may have a single emission point, share an emission point with one or more other emissions units, have multiple emission points, or have no true emission point (e.g., an emissions unit with fugitive emissions only). Enter, from the list below, the type of emission point associated with the emissions unit.

<u>Type</u>	<u>Description of Emission Point</u>
1	A single emission point serving a single emissions unit (e.g., a single stack serving a single boiler). The emission point is not shared with another emissions unit, nor does the emissions unit have other emission points.
2	An emission point serving two or more emissions units capable of simultaneous operation (e.g., a single stack serving two boilers).
3	A configuration of multiple emission points serving a single emissions unit (e.g., a series of building vents serving a single enclosed process operation, a group of exhaust stacks serving a collectively-regulated bank of combustion turbines, or a collection of roof vents serving a collectively-regulated group of volatile organic liquid storage tanks).
4	No true emission point (e.g., fugitive emissions from a coal pile or equipment leaks)

2. **Description of Control Equipment** - Enter a brief description of each emission control device or system associated with the emissions unit addressed in this report (e.g., centrifugal wet scrubber, type N roto-clone, etc.). If not applicable, leave blank.

C. EMISSIONS UNIT OPERATING SCHEDULE INFORMATION

1. **Average Annual Operation** - Enter the average number of hours per day (to the nearest hour) and days per week that the emissions unit operated during the year. The average

number of hours per day may be determined by dividing the total hours of operation (Field 2) by the number of days during which the emissions unit operated for at least one hour. The average number of days per week may be determined by dividing the total number of days during which the emissions unit operated (for at least one hour) by the number of weeks during which the emissions unit operated for at least one hour. If data are not available to compute these averages, "typical" values may be used. For example, if the emissions unit normally operated one shift per day, Monday through Friday, enter "8" hours per day and "5" days per week. If the emissions unit did not operate according to a typical schedule; e.g., a power generator operated as a "peaking" unit, enter the maximum hours per day and days per week that the emissions unit operated during the year.

2. **Total Operation During Year** - Enter the total number of hours per year that the emissions unit operated.
3. **Percent Hours of Operation by Season** - Enter, to the nearest whole percent, the percent of the total hours operated during the 12-month period, December 1 through November 30, for each three-month meteorological season. The total for all seasons must equal 100%.

Note: The DJF "season" should be reported as December of the year prior to the reporting year plus January and February of the reporting year.
4. **Average Summer Season Operation** - If the unit emits nitrogen oxides or volatile organic compounds, enter the average or typical number of hours per day (to the nearest hour) and days per week that the emissions unit operated during the summer season (June 1 through August 31).
5. **Total Operation During Summer Season** - If the unit emits nitrogen oxides or volatile organic compounds, enter the total number of days that the emissions unit operated during the summer season (June 1 through August 31).

D. EMISSIONS UNIT COMMENT

Enter any comments about the emissions unit addressed in this Emissions Unit Report, including any comments helpful in explaining any information entered or updated on this report.

E. EMISSIONS INFORMATION BY PROCESS/FUEL

This section of the form provides information on the emissions associated with each of the raw materials, processes, fuels, stored volatile organic liquids (VOL), products and other permitted activities associated with the emissions unit addressed on this Emissions Unit Report. The information is provided in a format consistent with the EPA Source Classification Code (SCC) system. The SCC system is a method of encoding the component raw material, process, fuel usage, and production rates needed to compute pollutant emission rates using the EPA publication "Compilation of Air Pollutant Emission Factors (AP-42)," and other similar references. Source Classification Codes and emission factor listings are found in the Factor Information Retrieval (FIRE) system available from the EPA Technology Transfer Network (TTN) website: www.epa.gov/ttn/chief/efpac/index.html.

A separate Subsection II.E. of the form must be completed for each process or fuel usage (i.e., for each SCC) which contributes to emissions of any pollutant required to be reported. For example, if the emissions unit addressed on this Emissions Unit Report has three SCCs, all of

which have non-zero emission factors for one or more reportable pollutants, three Subsection II.E.'s should be completed.

Note: Where multiple SCC's are involved, it may not be possible to calculate the emissions of every pollutant for each SCC separately. For example, some of the emissions factors for units such as kilns are based on the combined emissions from both the process itself and the in-process fuel that is used. In such case, the total emissions from the emissions unit should be reported for the principal SCC (e.g., the process SCC for a kiln), and an explanatory note should be provided in the Emissions Calculation field.

(1) PROCESS/FUEL INFORMATION

For each SCC (i.e., for each Subsection II.E.), Fields 1-8 of Subsection II.E.(1), as applicable, should be completed, and for each reportable pollutant associated with the SCC, Fields 1-5 of Subsection II.E.(2), as applicable, should be completed. For example, if an emissions unit emits PM₁₀, PM_{2.5}, sulfur dioxide, nitrogen oxides, carbon monoxide, and volatile organic compounds in reportable amounts, a set of Fields 1, 2, 4, and 5 of Subsection II.E.(2) should be completed for each of those six pollutants associated with the SCC addressed in Subsection II.E.(1), and Field 3 of Subsection II.E.(2) should also be completed for nitrogen oxides and volatile organic compounds.

1. **Source Classification Code (DEP Use)**
2. **Description of Process or Type of Fuel** - Enter a description of the type of material handling, process, fuel burning, or production operation that is addressed in this Subsection II.E. of the form, keeping in mind that separate Subsection II.E.'s are required for each permitted operation or activity (i.e., each SCC) to which emission factors are related. Use component breakdowns consistent with those used in AP-42 and the EPA SCC system. Taking the example of a cement production kiln, two processes to which emissions are related are the cement kiln itself (where emissions are related to tons of cement produced) and the coal burned in the cement kiln as in-process fuel (where emissions are related to tons burned). Each should be listed in a separate Subsection II.E. Another example is a boiler which burns both fuel oil and natural gas. The two listings would be for the oil used in the boiler (where emissions are related to thousand gallons burned) and natural gas used in boiler (where emissions are related to million cubic feet burned). The prefilled description corresponds to the SCC in Field 1. If the description appears applicable, report data in Fields 3-8 as required. If an alternative or additional description is needed, enter it on a blank Field 2. Any usage of used oil (on-spec or off-spec) should be specifically listed with rates reported in Fields 3 and 4. Entry of at least one process or fuel type is required for each emissions unit.
3. **Annual Process or Fuel Usage Rate** - Enter the annual process, fuel, or raw material usage rate corresponding to the process or fuel type identified in Field 2. The units must correspond to those used in the SCC system (Field 5).
4. **Summer Season Daily Process or Fuel Usage Rate** - If the unit emits nitrogen oxides or volatile organic compounds, enter the average or typical summer season (June 1 through August 31) daily process, fuel, or raw material usage rate corresponding to the process or fuel type identified in Field 2. The units must correspond to those used in the SCC system

(Field 5). If the daily process or fuel usage rate is zero for this particular SCC during the summer season, enter zero.

5. **SCC Unit** - Enter the applicable SCC unit of measurement for the annual and summer-season daily SCC rate information given in Fields 3 and 4. If not using a prefilled report, contact the Department to ensure use of the proper SCC unit.
6. **Fuel Average % Sulfur** - If the SCC relates to combustion of coal, oil, process gas, or LPG, enter on a weight-percent basis the average fuel sulfur content used during the year, to the nearest 0.01 percent.
7. **Fuel Average % Ash** - If the SCC relates to combustion of coal, enter on a weight-percent basis the average fuel ash content used during the year, to the nearest 0.1 percent. If ash measurements are not available, a typical value is acceptable.
8. **Fuel Heat Content** - Enter the average as-fired heat content of the fuel used during the year in million Btu per ton (solid fuels), per thousand gallons (liquid fuels), or per million cubic feet (gaseous fuels). The fuel quantity unit should correspond to the SCC unit in Field 5. If heat content measurements are not available, a typical value is acceptable.

(2) EMISSIONS INFORMATION

For the process or fuel type addressed in this Subsection II.E. of the form, Field 1 of Subsection II.E.(2) must be completed for each air pollutant listed on the EAOR or prefilled form and for any other pollutant which the emissions unit has the potential to emit in a reportable amount, even if the actual emissions for the reporting year were less than such amount. Fields 2-5, as applicable, should be completed for those air pollutants which were actually emitted in a reportable amount for the reporting year. Reportable emissions are defined as follows:

Pollutants Subject to Emission Limiting Standards:

For **any pollutant** that is subject to a numerical emission limiting standard, either by rule or permit condition, a set of Fields 2, 4 and 5 should be completed for each such pollutant, for each SCC, even if quantities are small. Field 3 should be completed only for NOX and VOC, and only where annual NOX or VOC emissions, respectively, are required to be reported in Field 2. 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 emission limiting standard for “any” hazardous air pollutant (HAP), without specifying a particular HAP, Fields 2, 4 and 5 should be completed for each HAP with emissions equal to or greater than 1000 pounds per year.

Pollutants Subject to Reporting Thresholds:

For criteria/precursor pollutants, individual hazardous air pollutants, and other pollutants as listed below that are emitted from the unit but **not** subject to any numerical emission limiting standards, a set of Fields 2, 4 and 5 should be completed for each such 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 below. Pollutants need not be reported for any SCC for which the emissions were less than the

appropriate threshold. Field 3 should be completed only for NOX and VOC, and only where annual NOX or VOC emissions, respectively, are required to be reported in Field 2.

Criteria/Precursor Pollutants:

<u>Pollutant</u>	<u>Reporting Threshold by SCC</u>
PM10, PM2.5, SO2, NOX, NH3, VOC, and CO	5.0 tons/year
Condensable particulate matter (CPM)	5.0 tons/year
Lead or lead compounds expressed as lead (PB)	500 pounds/year

The above criteria/precursor pollutant reporting requirements apply annually to all emissions units and to all criteria/precursor pollutants emitted from such units.

Note: Condensable particulate matter emissions need to be reported only if information is available to estimate emissions. If such information is not available, CPM should not be listed as a reportable pollutant on the form.

Hazardous Air Pollutants (HAPs):

<u>Pollutant</u>	<u>Reporting Threshold by SCC</u>
Each HAP as defined below	1000 pounds/year

This requirement applies to each HAP emitted at or above the threshold if the facility is major for total hazardous air pollutants (HAPS). If the facility is not major for total hazardous air pollutants, it only applies to each HAP for which the facility is major. The requirement applies only for reporting year 2008 and at three-year intervals thereafter (e.g., for reporting years 2011, 2014, etc.).

Other Air Pollutants:

<u>Pollutant</u>	<u>Reporting Threshold by SCC</u>
t-butyl acetate (TBAC)	5.0 tons/year

TBAC emissions should not be included in VOC emissions, but must be reported separately on an annual basis.

- Pollutant** - Enter the name or identification code (as listed above or in Appendix A) of the pollutant addressed on this set of Fields 1-5 of the form. Pollutants that must be addressed include each air pollutant listed on the EAOR or prefilled form. If a pollutant is not listed on the EAOR or prefilled form but is subject to an emission limiting standard or has the potential to be emitted in a reportable amount (even if the actual emissions for the reporting year were less than such amount), it must be entered in this field and reported in accordance with the instructions for this subsection. If no estimate of annual pollutant emissions is given in Field 2, indicate the reason by checking one of the following:

Below Threshold - The emissions unit has the potential to emit the listed pollutant in an amount equal to or greater than the reporting threshold, but the actual emissions for the reporting year for the SCC (i.e., the process or fuel type) addressed on this Subsection II.E. of the form were less than the threshold.

Not Emitted - In the case of a prefilled pollutant, the emissions unit has the potential to emit the listed pollutant but not as a result of the SCC addressed on this Subsection II.E. of the form.

2. **Annual Emissions** - Enter, in tons per year, a best estimate of the actual quantity of the pollutant identified in corresponding Field 1 that was emitted by the emissions unit, for the SCC, during the reporting year. Compute emissions according to the requirements of Rule 62-210.370, F.A.C. (see Appendix B), using the highest ranked applicable method listed in Field 4. An alternative method may be used only if it has been demonstrated to be more accurate than all otherwise applicable higher ranked methods.

Accounting for Soot Blowing Emissions: To the extent quantifiable, include elevated emissions resulting from soot blowing operations, if applicable, in the annual emissions estimate.

Accounting for Startup and Shutdown Emissions: If emissions are determined using a CEMS, include in the annual emissions estimate those emissions measured during startup and shutdown periods, even if no emission limitation applies during such periods. If startup and shutdown emissions are otherwise required by permit to be accounted for on an annual basis, compute such emissions according to the methodology specified by the permit, and include such emissions in the annual emissions estimate. For all other situations, include startup and shutdown emissions in the annual emissions estimate to the extent they can reasonably be quantified. For example, if a control efficiency is assumed in the emissions calculation, and the control device efficiency is known to be less during periods of startup or shutdown, emissions calculations for such periods should be adjusted accordingly. If emissions are inherently higher during startup or shutdown conditions, the annual emissions should reflect the cumulative effect of all startup and shutdown operations on emissions over the course of the year.

Accounting for Fugitive Emissions: If the emissions associated with a permitted emissions unit and SCC are entirely fugitive in nature, they must be reported, to the extent quantifiable, in the same manner as stack emissions (i.e., in accordance with the pollutant reporting criteria of Subsection II.E.(2)). If some of the emissions generated by the process are captured by a collection system and routed through control equipment, while the remainder of the emissions escape capture and are discharged as fugitive emissions, the fugitive component of the emissions should be reported as specified by the permitting office (e.g., by using a separate emissions unit established for such purpose). Fugitive particulate matter emissions resulting from vehicular movement or wind erosion need not be reported unless required by permit.

Documents from the EPA Emission Inventory Improvement Program (EIIP), available at <http://www.epa.gov/ttn/chief/eiip/index.html>, describe the emissions estimation procedures for many industries, and also provide guidance on how to incorporate the effects of control device efficiency variations into the emission estimates.

3. **Summer Season Daily Emissions** - If the pollutant is NOX or VOC, and the annual emissions are required to be reported in Field 2, enter the average or typical amount of the pollutant, for the SCC, emitted daily during the summer season (June 1 through August 31) in units of pounds per day. Show all calculations in Field 5 or on a separate sheet as required.

4. **Emissions Method Code** - Enter the code from the following list that best describes the method by which the actual emissions in Fields 2 and 3 were determined. The methods are listed in rank order of required use in accordance with Rule 62-210.370, F.A.C.

<u>Code</u>	<u>Description of Emission Method</u>
1A	This entry indicates that the emissions were determined based on emissions measurement using a continuous emissions monitoring system (CEMS).
2	This entry indicates that the emissions were calculated by the use of materials balance and knowledge of the process.
3A	This entry indicates that the emissions were calculated using an emission factor based on site-specific data such as stack test data.
3B	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	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	This entry indicates that the emissions were calculated using an emission factor other than one listed above.

5. **Emissions Calculation** - Provide all calculations for the emissions reported in Fields 2 and 3, clearly showing how soot blowing, startup, shutdown, control efficiency, capture efficiency, and fugitive emissions, as applicable, are reflected in the reported totals. Use a separate sheet as needed. If the emissions during soot blowing or startup/shutdown periods are determined by a CEMS and included in the reported totals (please provide a statement confirming this), it is not necessary to provide separate calculations of soot blowing, startup, or shutdown emissions. If the emissions calculation methodology does not follow the Field 4 rank order of required use from Rule 62-210.370, F.A.C., provide a demonstration, as required by the rule, that the alternative approach is more accurate.

APPENDIX A
POLLUTANT IDENTIFICATION CODES

Criteria and Precursor Air Pollutants

<u>Pollutant Name</u>	<u>Identification Code</u>
Ammonia	NH3
Carbon Monoxide	CO
Lead - Total (including elemental lead and all lead compounds, expressed as lead)	PB
Nitrogen Oxides (including nitrogen dioxide and nitric oxide, expressed as nitrogen dioxide)	NOX
Particulate Matter – PM10 (particles nominally 10 microns or less in aerodynamic diameter)	PM10
Particulate Matter – PM2.5 (particles nominally 2.5 microns or less in aerodynamic diameter)	PM2.5
Sulfur Dioxide	SO2
Volatile Organic Compounds (excluding those compounds defined by rule which do not participate in atmospheric photochemical reactions)	VOC

APPENDIX A (Continued)**Designated Air Pollutants****(Pollutants regulated under sections 111 or 129 of the Clean Air Act)**

<u>Pollutant Name</u>	<u>Identification Code</u>
Cadmium	H027
Dioxin/Furan (MWC organics) (including all tetra through octachlorinated dibenzo-p-dioxins and dibenzofurans)	D/F
Fluorides - Total (including elemental fluorine and all fluoride compounds)	FL
Hydrogen Chloride	H106
Hydrogen Sulfide	H2S
Mercury	H114
Municipal waste combustor metals (measured as particulate matter)	PM
Municipal waste combustor acid gases (measured as sulfur dioxide and hydrogen chloride)	SO2 H106
Municipal solid waste landfill emissions (measured as nonmethane organic compounds)	NMOC
Particulate Matter – Total (including all particles as measured by applicable reference methods specified in 40 CFR 60)	PM
Reduced Sulfur Compounds (for petroleum refineries; including H2S, carbonyl sulfide, and carbon disulfide)	RSC
Sulfuric Acid Mist	SAM
Total Reduced Sulfur (for pulp mills and tall oil plants; including H2S, methyl mercaptan, dimethyl sulfide, and dimethyl disulfide)	TRS

APPENDIX A (Continued)**Hazardous Air Pollutants**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
Total Hazardous Air Pollutants		HAPS
Acetaldehyde	75-07-0	H001
Acetamide	60-35-5	H002
Acetonitrile	75-05-8	H003
Acetophenone	98-86-2	H004
2-Acetylaminofluorene	53-96-3	H005
Acrolein	107-02-8	H006
Acrylamide	79-06-1	H007
Acrylic acid	79-10-7	H008
Acrylonitrile	107-13-1	H009
Allyl chloride	107-05-1	H010
4-Aminobiphenyl	92-67-1	H011
Aniline	62-53-3	H012
o-Anisidine	90-04-0	H013
Antimony Compounds		H014
Arsenic Compounds (inorganic including arsine)		H015
Asbestos	1332-21-4	H016
Benzene (including benzene from gasoline)	71-43-2	H017
Benzidine	92-87-5	H018
Benzotrichloride	98-07-7	H019
Benzyl chloride	100-44-7	H020
Beryllium Compounds		H021
Biphenyl	92-52-4	H022
Bis(2-ethylhexyl)phthalate (DEHP)	117-81-7	H023
Bis(chloromethyl)ether	542-88-1	H024
Bromoform	75-25-2	H025
1,3-Butadiene	106-99-0	H026
Cadmium Compounds		H027
Calcium cyanamide	156-62-7	H028
(Reserved)		
Captan	133-06-2	H030
Carbaryl	63-25-2	H031
Carbon disulfide	75-15-0	H032

APPENDIX A (Continued)**Hazardous Air Pollutants (continued)**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
Carbon tetrachloride	56-23-5	H033
Carbonyl sulfide	463-58-1	H034
Catechol	120-80-9	H035
Chloramben	133-90-4	H036
Chlordane	57-74-9	H037
Chlorine	7782-50-5	H038
Chloroacetic acid	79-11-8	H039
2-Chloroacetophenone	532-27-4	H040
Chlorobenzene	108-90-7	H041
Chlorobenzilate	510-15-6	H042
Chloroform	67-66-3	H043
Chloromethyl methyl ether	107-30-2	H044
Chloroprene	126-99-8	H045
Chromium Compounds		H046
Cobalt Compounds		H047
Coke Oven Emissions		H048
Cresols/Cresylic acid (isomers and mixture)	1319-77-3	H049
o-Cresol	95-48-7	H050
m-Cresol	108-39-4	H051
p-Cresol	106-44-5	H052
Cumene	98-82-8	H053
Cyanide Compounds (X'CN, where X = H' or any other group where a formal dissociation may occur; for example, KCN or Ca(CN)2)		H054
2,4-D, salts and esters	94-75-7	H055
DDE	3547-04-4	H056
Diazomethane	334-88-3	H057
Dibenzofurans	132-64-9	H058
1,2-Dibromo-3-chloropropane	96-12-8	H059
Dibutylphthalate	84-74-2	H060
1,4-Dichlorobenzene(p)	106-46-7	H061
3,3-Dichlorobenzidene	91-94-1	H062
Dichloroethyl ether (Bis(2-chloroethyl)ether)	111-44-4	H063

APPENDIX A (Continued)**Hazardous Air Pollutants (continued)**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
1,3-Dichloropropene	542-75-6	H064
Dichlorvos	62-73-7	H065
Diethanolamine	111-42-2	H066
N,N-Diethyl aniline (N,N-Dimethylaniline)	121-69-7	H067
Diethyl sulfate	64-67-5	H068
3,3-Dimethoxybenzidine	119-90-4	H069
Dimethyl aminoazobenzene	60-11-7	H070
3,3-Dimethyl benzidine	1119-93-7	H071
Dimethyl carbamoyl chloride	79-44-7	H072
Dimethyl formamide	68-12-2	H073
1,1-Dimethyl hydrazine	57-14-7	H074
Dimethyl phthalate	131-11-3	H075
Dimethyl sulfate	77-78-1	H076
4,6-Dinitro-o-cresol, and salts	534-52-1	H077
2,4-Dinitrophenol	51-25-8	H078
2,4-Dinitrotoluene	121-14-2	H079
1,4-Dioxane (1,4-Diethyleneoxide)	123-91-1	H080
1,2-Diphenylhydrazine	122-66-7	H081
Epichlorohydrin (1-Chloro-2,3-epoxypropane)	106-89-8	H082
1,2-Epoxybutane	106-88-7	H083
Ethyl acrylate	140-88-5	H084
Ethyl benzene	100-41-4	H085
Ethyl carbamate (Urethane)	51-79-6	H086
Ethyl chloride (Chloroethane)	75-00-3	H087
Ethylene dibromide (Dibromoethane)	106-93-4	H088
Ethylene dichloride (1,2-Dichloroethane)	10706-2	H089
Ethylene glycol	107-21-1	H090
Ethylene imine (Aziridine)	151-56-4	H091
Ethylene oxide	75-21-8	H092
Ethylene thiourea	96-45-7	H093
Ethylidene dichloride (1,1-Dichloroethane)	75-34-3	H094
Formaldehyde	50-00-0	H095

APPENDIX A (Continued)**Hazardous Air Pollutants (continued)**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
Glycol ethers (includes mono- and di-ethers of ethylene glycol, diethylene glycol, and triethylene glycol R-(OCH ₂ CH ₂) _n -OR' where: n = 1, 2, or 3; R = alkyl C7 or less; or R = phenyl or alkyl substituted phenyl; R' = H or alkyl C7 or less; or OR' consisting of carboxylic acid ester, sulfate, phosphate, nitrate, or sulfonate. Excludes ethylene glycol monobutyl ether (EGBE, 2-Butoxyethanol – CAS Number 111-76-2).		H096
Heptachlor	76-44-8	H097
Hexachlorobenzene	118-74-1	H098
Hexachlorobutadiene	87-68-3	H099
Hexachlorocyclopentadiene	77-47-4	H100
Hexachloroethane	67-72-1	H101
Hexamethylene-1,6-diisocyanate	822-06-0	H102
Hexamethylphosphoramide	680-31-9	H103
Hexane	110-54-3	H104
Hydrazine	302-01-2	H105
Hydrochloric acid	7647-01-0	H106
Hydrogen fluoride (Hydrofluoric acid)	7664-39-3	H107
Hydroquinone	123-31-9	H108
Isophorone	78-59-1	H109
Lead Compounds		PB
Lindane (all isomers)	58-89-9	H111
Maleic anhydride	108-31-6	H112
Manganese Compounds		H113
Mercury Compounds		H114
Methanol	67-56-1	H115
Methoxychlor	72-43-5	H116
Methyl bromide (Bromomethane)	74-83-9	H117
Methyl chloride (Chloromethane)	74-87-3	H118
Methyl chloroform (1,1,1-Trichloroethane)	71-55-6	H119
(Reserved)		
Methyl hydrazine	60-34-4	H121
Methyl iodide (Iodomethane)	74-88-4	H122

APPENDIX A (Continued)**Hazardous Air Pollutants (continued)**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
Methyl isobutyl ketone (Hexone)	108-10-1	H123
Methyl isocyanate	624-83-9	H124
Methyl methacrylate	80-62-6	H125
Methyl tert butyl ether	1634-04-4	H126
4,4-Methylene bis (2-chloroaniline)	101-14-4	H127
Methylene chloride (Dichloromethane)	75-09-2	H128
Methylene diphenyl diisocyanate (MDI)	101-68-8	H129
4,4-Methylenedianiline	101-77-9	H130
Mineral fibers (fine), includes mineral fiber emissions from facilities manufacturing or processing glass, rock, or slag fibers (or other mineral derived fibers) of average diameter 1 micrometer or less		H131
Naphthalene	91-20-3	H132
Nickel Compounds		H133
Nitrobenzene	98-95-3	H134
4-Nitrobiphenyl	92-93-3	H135
4-Nitrophenol	100-02-7	H136
2-Nitropropane	79-49-6	H137
N-Nitroso-N-methylurea	684-93-5	H138
N-Nitrosodimethylamine	62-75-9	H139
N-Nitrosomorpholine	59-89-2	H140
Parathion	56-38-2	H141
Pentachloronitrobenzene (Quintobenzene)	82-68-8	H142
Pentachlorophenol	87-86-5	H143
Phenol	108-95-2	H144
p-Phenylenediamine	106-50-3	H145
Phosgene	75-44-5	H146
Phosphine	7803-51-2	H147
Phosphorus	7723-14-0	H148
Phthalic anhydride	85-44-9	H149
Polychlorinated biphenyls (Aroclors)	1336-36-3	H150

APPENDIX A (Continued)**Hazardous Air Pollutants (continued)**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
Polycyclic organic matter (includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C)		H151
1,3-Propane sultone	1120-71-4	H152
beta-Propiolactone	57-57-8	H153
Propionaldehyde	123-38-6	H154
Propoxur (Baygon)	114-26-1	H155
Propylene dichloride (1,2-Dichloropropane)	78-87-5	H156
Propylene oxide	75-56-9	H157
1,2-Propylenimine (2-Methyl aziridine)	75-55-8	H158
Quinoline	91-22-5	H159
Quinone	106-51-4	H160
Radionuclides (including radon), a type of atom which spontaneously undergoes radioactive decay		H161
Selenium Compounds		H162
Styrene	100-42-5	H163
Styrene oxide	96-09-3	H164
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746-01-6	H165
1,1,2,2-Tetrachloroethane	79-34-5	H166
Tetrachloroethylene (Perchloroethylene)	127-18-4	H167
Titanium tetrachloride	7550-45-0	H168
Toluene	108-88-3	H169
2,4-Toluene diamine	95-80-7	H170
2,4-Toluene diisocyanate	584-84-9	H171
o-Toluidine	95-53-4	H172
Toxaphene (chlorinated camphene)	8001-35-2	H173
1,2,4-Trichlorobenzene	120-82-1	H174
1,1,2-Trichloroethane	79-00-5	H175
Trichloroethylene	79-01-6	H176
2,4,5-Trichlorophenol	95-95-4	H177
2,4,6-Trichlorophenol	88-06-2	H178
Triethylamine	121-44-8	H179
Trifluralin	1582-09-8	H180

APPENDIX A (Continued)**Hazardous Air Pollutants (continued)**

<u>Pollutant Name</u>	<u>CAS Number</u>	<u>Identification Code</u>
2,2,4-Trimethylpentane	540-84-1	H181
Vinyl acetate	108-05-4	H182
Vinyl bromide	593-60-2	H183
Vinyl chloride	75-01-4	H184
Vinylidene chloride (1,1-Dichloroethylene)	75-35-4	H185
Xylenes (isomers and mixtures)	1330-20-7	H186
o-Xylenes	95-47-6	H187
m-Xylenes	108-38-3	H188
p-Xylenes	106-42-3	H189

For all listings above which contain the word “compounds” and glycol ethers, the following applies: unless otherwise specified, these listings are defined as including the named chemical and any unique chemical substance that contains the named chemical (i.e., antimony, arsenic, etc.) as part of that chemical’s infrastructure.

Certain subparts of 40 CFR Part 63 regulate HAPs through emission limitations for related pollutants. Some of these related pollutants are listed in this appendix under either “Criteria and Precursor Pollutants” or “Designated Air Pollutants;” for example, carbon monoxide (CO) and dioxin/furans (D/F). Other such related pollutants are listed below.

<u>Subpart</u>	<u>Related Pollutant Name</u>	<u>Identification Code</u>
LLL	Total Hydrocarbons	THC

APPENDIX B
RULE 62-210.370(1) – (3), F.A.C.

62-210.370 Emissions Computation and Reporting.

(1) Applicability. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit.

(2) Computation of Emissions. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.

(a) Basic Approach. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.

1. If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
2. If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
3. If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

APPENDIX B (continued)

(b) Continuous Emissions Monitoring System (CEMS).

1. An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - a. The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - b. The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
2. Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - a. A calibrated flowmeter that records data on a continuous basis, if available; or
 - b. The average flow rate of all valid stack tests conducted during 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.
3. The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.

(c) Mass Balance Calculations.

1. An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - a. Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - b. Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
2. Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
3. In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.

APPENDIX B (continued)

(d) Emission Factors.

1. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
 - a. If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all 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.
 - b. Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - c. 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.
2. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.

(e) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.

(f) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.

(g) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.

(h) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

APPENDIX B (continued)

(3) Annual Operating Report for Air Pollutant Emitting Facility.

(a) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:

1. All Title V sources.
2. All synthetic non-Title V sources.
3. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
4. All facilities for which an annual operating report is required by rule or permit.

(b) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.

(c) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year, except that the annual operating report for year 2008 shall be submitted by May 1, 2009. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.

(d) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.

Last updated: 3/28/2011

DARM's Emissions Inventory Webpage

<http://www.floridadep.org/air/emission/inventory.htm>

Rule 62-210 – Stationary Sources, General Requirements

<http://www.floridadep.org/air/rules/fac/62-210.pdf>

DARM's EAOR Webpage

<http://www.floridadep.org/air/emission/eaor/default.htm>

EAOR Facility Version Manual

<http://www.floridadep.org/air/emission/eaor/documents/FacilityManual.pdf>

EAOR Reviewer Software and Manual (DEPnet, only)

http://appprod.dep.state.fl.us/arms_reports/eaor/Software/Download.asp

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January 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: SEBR.
2. Data Cleaning – Thank you to all offices for completing your data cleaning in a timely manner. Your efforts are appreciated.
3. 2008 AOR Status
 - In December, AOR letters were mailed to all facilities that are required to submit an AOR for the 2008 reporting year. Additionally, the letters were emailed to those facilities and consultants for which we have email addresses.
 - Our website has been updated to reflect important details and information relative to the AOR for the 2008 reporting year: <http://www.dep.state.fl.us/air/eproducts/eaor/default.htm>.
 - A new version of EAOR Facility is also available at the website. Please note that facilities must install and use this version to submit their AORs for the 2008 reporting year. Keep in mind that this is the EAOR for facility use and not for us to look at the data. Revisions to the EAOR Reviewer are forthcoming to incorporate changes that are consistent with EAOR Facility; we will notify you when this new version is available. However, you may still use the current version of EAOR Reviewer to look at the data that is being submitted by facilities.
 - Remember the deadline to submit the 2008 AOR is May 1, 2009. This is reflected in Rule 210.370 and the updated instructions. As a result of the deadline date change, questions have arisen as to how a Title V facility would complete their annual Statement of Compliance form at the end of 2009 (please refer to attached email from Cindy Phillips in reference to this concern).
4. AOR Workshop - We will host an AOR Workshop in Tampa, FL on January 13, 2009 primarily for regulated industry and consultants, but open to district/local staff. Registration details and more information is available on our website. A block of rooms have been reserved for district staff at a reduced rate; however, the cut-off date for these rooms has passed.

Broward County office will host an additional AOR workshop in their area in early March. Tallahassee staff will be in attendance for EAOR training. For information on the date and location, please contact Paul Shelton at (954) 519-1444 or PSHELTON@broward.org.

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February 2009 AOR Teleconference - Cancelled

We will not have a teleconference for the month of February. The next meeting will be on March 3rd.

- A new version of EAOR Facility is available at our website: <http://www.dep.state.fl.us/air/eproducts/eaor/default.htm>. Please note that facilities must install and use this version to submit their AORs for the 2008 reporting year. Keep in mind that this is the EAOR for facility use and not for us to look at the data. Revisions to the EAOR Reviewer are forthcoming to incorporate changes that are consistent with EAOR Facility; we will notify you when this new version is available. However, you may still use the current version of EAOR Reviewer to look at the data that is being submitted by facilities.
- Handouts and presentations from the AOR workshop that was held in Tampa, FL on January 13, 2009 are also available at our website.
- Broward County office will host an additional AOR workshop in Hollywood, FL on March 11, 2009. Tallahassee staff will be in attendance for EAOR training. Registration information and details are available on our website: <http://www.dep.state.fl.us/air/eproducts/eaor/default.htm> or contact Paul Shelton at (954) 519-1444 or PSHELTON@broward.org. Additionally, if any other offices are interested in hosting a workshop, please let me know.
- We are currently considering providing EAOR Reviewer NetMeeting-based training sessions to district and local users. Please let me know how many of you would be interested in trainings such as these.

Please let me know if you have any questions or concerns. Thank you.

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March 09 AOR Teleconference

SUMMARY OF AOR TELECONFERENCE

Attendance—Palm Beach County is the only office that did not attend.

New version of EAOR reviewer—We will get a release to test either 3/6 or 3/9. The target date for production is 4/1. Districts and locals can view the 2008 data with the current version of EAOR reviewer. But the current version is lacking some of the new data and new edit checks. Better to wait to verify the data, since districts and locals will need to re-verify the data using the new version of EAOR reviewer, once it is available.

Review timeline—Upload all data by 6/30, finish edit checks by 9/30. DARM will add additional staff to review and upload the data in the shortened time period.

Expectations for districts and locals—If any office wants to review the data from their facilities before DARM reviews and uploads the submissions, the district or local needs to contact DARM to set up a schedule. The schedule must allow time for DARM to review and upload the data before 6/30 (i.e., the district or local should make continual progress on the reviews, and not wait until the middle or end of June before reviewing). Contact DARM by Friday, March 6 if your office wants to review the submittals prior to DARM review and upload.

Post-upload changes—After DARM uploads the data, districts and locals can still review their facilities' submissions. If the district or local finds a problem and needs to make changes to a facility, request DARM to release that particular facility. This is the only case that DARM will release the data to avoid unnecessary repeat of the upload process. In other words, DARM will not release all of an office's facilities after DARM has already reviewed and uploaded—but DARM will release individual facilities upon request.

AOR/EAOR FAQ—DARM has been working on creating a FAQ to be posted on the EAOR website. DARM welcomes comments from districts and locals. DARM will e-mail a copy of the FAQ when it is ready; be sure to ask additional questions so that DARM can add new questions to the list as the review process continues.

March 11 Workshop—DARM will not physically be at the meeting because of DEP travel restrictions. DARM has been working with Broward County to resolve technical issues with Netmeeting; the plan is to use teleconferencing and Netmeeting to cover the EAOR training (including the new reporting requirements for the 2008 AOR). Districts and locals are encouraged to suggest any other training options for the future since travel will likely be very limited.

Submittals to Date—DARM has received 330 AOR submittals as of today.

324 EAOR submittals

5 e-mails

1 floppy disk

135 signature pages (which will be forward to districts and locals next week)

April 09 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: SD, SEDA, and SWSA
2. The new version of the EAOR Reviewer software is now available:
http://appprod.dep.state.fl.us/arms_reports/eaor/Software/Download.asp. Please have your IT staff to install it. Please let us know if you encounter any problems or have questions.

The new data field (startup/shutdown emissions) is not available in this version; however, it will be available in the next version which should be available in about two weeks.

3. EAOR Reviewer NetMeeting Training will be held on Thursday, April 9, 2009 from 2 PM-4 PM. This training will demonstrate the functionality and use of the software. Due to limitations of the program, only five offices are able to attend. The first five offices to register were: SED, SWHI, SD, SWD, and NEDV. If any of these offices is unable to attend, please let me know so we can allow another office to take your place. DARM anticipates hosting another training possibly as soon as Tuesday, April 14th.
4. The following offices have informed DARM that they will review their AOR submittals prior to DARM review and upload: CD, SEBR, and SWPN. A review schedule (percent completion by certain dates) will be sent to each of these offices by the end of today. Please adhere to these deadlines in order to maintain continual progress and attain our goal to have all of the data uploaded by 6/30.
5. DARM will refer all questions and requests to the district/local offices in reference to the following issues:
 - Facilities requesting an extension for the submission of their AORs
 - Facilities inquiring as to whether or not to submit an AOR if they shutdown during the reporting year
6. Submittals to Date – DARM has received 505 submittals as of today.
 - 491 EAOR submittals
 - 12 emails
 - 2 floppy disk

Thanks.

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May 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: NWD and SWSA

2. The new version of the EAOR Reviewer software was not available as originally anticipated due to an attachment problem discovered in EAOR Reviewer production. Users were able to open an attachment at one point in time; however they were not able to open the attachment at a later time. Or a user was not able to open the attachment at all. The new version corrects this issue and the new data field (startup/shutdown emissions) will be available, also. This new version is expected to be available early next week.

3. 2008 AOR Review Status

- Please note that the “Paper” column in the upload status provided to you on Monday, May 4th accounts for the paper submissions processed in EAOR and the paper submissions that we have received here in Tallahassee. Paper submissions that we receive here are been forwarded onto district/local offices to process.
- Please use the EAOR Review Status Report to see who has submitted AOR thus far. You may want to start contacting facilities if an AOR has not been received.
- We have processed all disk and email submittals we have received here, thus far. If you receive a disk or email submission, please email it to Cadedra Parmer at Cadedra.Parmer@dep.state.fl.us so that it can be imported into EAOR.
- DARM will be reviewing and uploading the AORs for all facilities except those facilities within offices that have informed us that they want to review their data first. These offices are: CD, SEBR, SEPB, and SWPN.
- If your EAOR Reviewer performance, especially for the local programs, at any point in time appears to be slower than normal, please let me know.

4. Signature Pages – We are continuously forwarding signature pages onto you as we receive them. We mailed signature pages on Tuesday, May 4th. We plan to mail more on Friday, May 8th. Remember the AOR is not complete until it is certified. We currently do not have electronic signature availability but we plan to in the future. For now, hardcopy is the only option. DARM will not pursue missing signature pages because we feel that this is a compliance issue not an inventory issue. As far as requiring signature pages for revisions, we are leaving this up to the district and local offices.

5. ARMS CA Reports-Management Report – The AOR part on this report is not working correctly. It is listing reports that are not late, as late. Our IT staff is currently looking into resolving this. If you have questions, please contact Dianne Spingler at Dianne.Spingler@dep.state.fl.us or 850-921-9521.

6. Submittals to Date – DARM has received 1008 EAOR submittals as of today.

- 940 web submittals
- 44 emails
- 7 floppy disk
- 17 paper submittals processed in EAOR

Thanks. Cadedra Parmer Hodge

June 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: NWD, SEDA, SEPB
2. 2008 AOR Review Status – As of June 3, 2009, approximately 40% of the facilities have been uploaded into ARMS. Our goal is to complete the review and upload of all facilities no later than June 30, 2009. District and local offices are to complete their edit checks by September 30, 2009. As in the past, the date done should not be entered in ARMS until after the edit check and compliance determination is complete. In the past, most offices have waited until all of the data for facilities in their office are uploaded into ARMS before addressing their edit checks.
3. EAOR Reviewer Performance – We have received emails and phone calls from many of the local programs in regards to problems with EAOR Reviewer performance. Each local program in attendance provided input on the performance of Reviewer compared to the earlier version for this year and last year's. We are looking into and working with those offices who have complained in hopes to resolve these issues. If any other offices encounter problems, please let me know.
4. Reporting PM – If there is no permit limit for PM, the facility is not required to report it. If there is a PM limit, they must continue to report.
5. HAPs reporting – It is not very useful adding total HAPS (HAPS) because it will appear in EAOR in the future but it is not required. The individual HAPs are required if above the reporting threshold. If you want to help facilities with HAPs reporting in the future, you should identify a set of individual HAPs and add them.
6. Adding New Pollutants – With the addition of new criteria pollutants for this reporting year (i.e. CPM, TBAC, etc.), we have noticed a lot of facilities are adding new pollutants to EU that are not applicable. There is no need to add a pollutant, unless it is applicable. For example, we do not add PM10 to a unit that would never emit it (storage tanks) nor do we add VOC to a unit that only emits particulate matters.
7. Startup/Shutdown Emissions – There were some questions posed about whether it's safe to assume that the startup/shutdown emissions are included for some emission calculation methodology:
 - CEMS – It is possible that not all startup/shutdown emissions are included. It depends on other factors.
 - Mass Balance – The startup/shutdown emissions are included but it is not relevant.

As far as the startup/shutdown emission box in EAOR Reviewer is concerned, please be aware that this is a feature that was added to serve as a useful resource – so we can track the facilities that are reporting the startup/shutdown emissions and see how they are calculating these emissions so that we may provide some direction to industry on calculation methodology in the future. Also, this field is not in the EAOR Facility version and we have no plans of adding it. Please keep this in mind when checking the S/S box in Reviewer.

Thanks.

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July 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: NEDV, SEPB
2. 2008 AOR Review Status – As of July 10, 2009, approximately 86% of the facilities have been uploaded into ARMS. Our goal is to complete the review and upload of all facilities no later than July 14, 2009.
3. Marking facilities Ready for Review - The following is a list of facilities with a status of Verified or Not Verified where the Status Username is identified as a district/local user. Since the teleconference, we have not received an update from these offices on the status of these facilities. If you are done reviewing the data, please mark it “Ready for Review” by the end of today so DARM staff will know that you are done. If you are not done, please let me know the status (i.e. you’re waiting for corrections from the facility, you’re not done entering the data for a paper AOR, etc.).

Office	Facility ID	Facility Owner/Company Name	Media
CDOR	'0950159	CUBIC SIMULATION SYSTEMS, INC.	Web
CDOR	'0950169	STERICYCLE INC	Paper
CDOR	'0951315	FLORIDA HOSPITAL	Web
SEBR	'0112156	C & C MARBLE, INC.	Paper
SEDA	'0250991	FINE ART LAMPS	Paper

4. Schedule, activities, due dates for AOR edit check - District and local offices are to complete their edit checks by September 30, 2009. As in the past, the date done should not be entered in ARMS until after the edit check and compliance determination is complete. In the past, most offices have waited until all of the data for facilities in their office are uploaded into ARMS before addressing their edit checks.
5. Other topics/questions - A facility really should get its permit modified if they want to report emissions for multiple emission units in a grouped format. There are many examples of permits which have a single emission unit that represents a bank of multiple engines or combustion turbines. Permits that are set up with one emission unit for each individual engine or turbine are usually done for a reason; there may be individual emission limits or even different rules that apply to the different pieces of equipment.
Regarding the aggregation of emissions without regard to fuel type, this seems clearly contrary to the AOR instructions, which require reporting of fuel use and emissions by SCC (which indicates that the reporting should be by fuel type). For facilities with combined stacks, where multiple emission units are routed to a single emission point, if the facility only has a CEMS on the combined emission point, they should make some attempt to distribute those emissions to the contributing emission units. This is consistent with the AOR requirements to report by emission unit (and by SCC/process/fuel type) and with the provisions of, for example, the acid rain program.

Thanks.

Cadedra Parmer Hodge
Environmental Specialist

August 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: CD, NED, SWSA
2. 2008 AOR Review Status – The following offices are not finished: CD, NEDV, NWD, SD, SEPB, and SWHI.
3. As of August 6, 2009, DARM has confirmed that the following offices have finished their 2008 AOR edit check and review: SWSA .
If you think your office has finished the 2008 AOR edit check and review, please send me an email so I can confirm your status. The deadline to complete the 2008 AOR edit check and review is September 30, 2009.
4. Offices present addressed those facilities on hold. The following facilities are still on hold:

OFFICE	FACILITY ID	FACILITY OWNER/COMPANY NAME
CD	0950111	WALT DISNEY WORLD COMPANY
NWD	0330042	INTERNATIONAL PAPER COMPANY
SD	0210031	BREITBURN FLORIDA, LLC
SEPB	0990021	UNITED TECHNOLOGIES CORPORATION
SWHI	0570005	CF INDUSTRIES, INC., PLANT CITY PHOS

Feel free to contact me if you have questions or need assistance. Thanks.

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September 2009 AOR Teleconference

The regularly scheduled AOR Teleconference scheduled for September is cancelled. The deadline to complete the 2008 AOR Edit Check & Review process is September 30, 2009.

1. As of today (August 28), DARM has confirmed that the following offices have completed the 2008 AOR Edit Checks and Review: NEDV, SED, SWPN, SWSA

If you think your office has finished the AOR Edit Check and Review, please send me an email so I can review and confirm your status.

2. The following facilities are still on hold:

Office	Facility ID	Facility Owner/Company Name
SEPB	'0990021	UNITED TECHNOLOGIES CORPORATION
SWHI	'0570039	TAMPA ELECTRIC COMPANY
SWHI	'0571274	VULCAN MATERIALS COMPANY, FLORIDA ROCK D

If you have questions or need assistance, please feel free to contact me directly. Thanks.

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October 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: CDOR
2. 2008 AOR Edit Check & Review Status – SWHI is the only offices that is not complete.
3. The next step in the AOR process is preparation for the 2009 AOR; the 2008 AOR Data Cleanup Reports are tentatively scheduled to be sent out no later than November 15th to all offices.
4. EPSAP Change - The SIC code is on a separate page now; it is now a menu option on the Facility page (it used to be located on the facility page).

Thanks.

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November 2009 AOR Teleconference

The regularly scheduled AOR Teleconference scheduled for November is cancelled.

1. The deadline to complete the 2008 AOR Edit Check & Review process has passed. SWHI is the only office that is not complete.
2. The next step in the AOR process is preparation for the 2009 AOR; the 2008 AOR Data Cleanup Reports are tentatively scheduled to be sent out no later than November 15th to all offices.
3. We are planning to send out letters to the facilities that are required to submit an AOR. These letters will be sent out December 2009. We will provide more details at a later time.
4. As a means to address some inventory-related issues as well as to provide some face-to-face communication with the district and local staff, we are currently considering incorporating an inventory-related session into the Compliance & Enforcement Workshop in February 2010. We were wondering your thoughts on this and your preference as to the timing of this session (before, during, or after the Compliance & Enforcement Workshop)? Your feedback is appreciated.

Thanks.

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December 2009 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. The following offices were absent: SEPB and SWHI.
2. The 2008 AOR Review and Edit Checks are complete. Thanks to all the offices on working with us to complete this.
3. The next step in the AOR process is preparation for the 2009 AOR.
 - Please complete the data cleaning by 12/15. If you have any problems, please let me know. Also, please let me know any data that should be done by Tallahassee.
 - We will send a one page letter to facilities on the 2009 AOR later this month. All the information they need will be available on the website.

The AOR Required field in ARMS will be used to generate the mailing list for these letters. The following facilities with an AOR Required = Y in ARMS are included on the list: (a) facilities with an “Active” or “Construction” status and (b) facilities with an “Inactive” status and a final shutdown date of this year. With this in mind, if there is a facility that has an “Inactive” status and operated during 2009 and you would like for it to report a 2009 AOR, please be sure to enter a final shutdown date of this year in ARMS.

- The updated EAOR Facility Version will be available early January 2010. The updated EAOR Reviewer Version will be available early 2010.
4. An “Inventory-related” session is tentatively being planned for the Compliance & Enforcement training in February 2010. Please keep in mind that this training is still awaiting final approval from management and further details will be provided upon approval. However, if you have any suggestions for topics to be covered for the “inventory-related” session, please let me know.

Thanks.

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January 2010 AOR Teleconference

We will not have a teleconference this month. The next meeting will be on February 2.

1. 2009 AOR Status

- In December 2009, AOR letters were mailed to all facilities that are required to submit an AOR for the 2009 reporting year. I emailed you a copy of the letter. If anyone still needs a copy, please let me know.
- Our website has been updated to reflect important details and information relative to the AOR for the 2009 reporting year:
<http://www.dep.state.fl.us/air/emission/eaor/default.htm>.
- A new version of EAOR Facility is also available at the website. Please note that facilities must install and use this version to submit their AORs for the 2009 reporting year. Keep in mind that this is the EAOR for facility use and not for us to look at the data. Revisions to the EAOR Reviewer are forthcoming to incorporate changes that are consistent with EAOR Facility; we will notify you when this new version is available. However, you may still use the current version of EAOR Reviewer to look at the data that is being submitted by facilities.
- Remember the deadline to submit the 2009 AOR is April 1, 2010, according to Rule 62-210.370, F.A.C.

2. Training to Industry - In the past, we held a workshop for industries and consultants around the end of January to provide guidance on AOR and training on the use of EAOR program. Due to the budget problems, we will not hold the workshop this year. However, we plan to provide training using a web-based setting in February 2010. More details will be provided on the website at a later time.

3. Statewide Compliance & Enforcement Training – An “Inventory-related” session will be held during this training on February 16 -18, 2010 in Tampa, FL. Please see attached emails from Cindy Phillips for details on registering, hotel reservations, and other information. If you have any specific questions that you would like addressed at this workshop, please let me know.

Please let me know if you have any questions or concerns. Thank you.

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February 2010 AOR Teleconference - Cancelled

We will not have a teleconference for the month of February. The next meeting will be on March 3rd.

- ☐ A new version of EAOR Facility is available at our website:
<http://www.dep.state.fl.us/air/eproducts/eaor/default.htm>. Please note that facilities must install and use this version to submit their AORs for the 2008 reporting year. Keep in mind that this is the EAOR for facility use and not for us to look at the data. Revisions to the EAOR Reviewer are forthcoming to incorporate changes that are consistent with EAOR Facility; we will notify you when this new version is available. However, you may still use the current version of EAOR Reviewer to look at the data that is being submitted by facilities.
- ☐ Handouts and presentations from the AOR workshop that was held in Tampa, FL on January 13, 2009 are also available at our website.
- ☐ Broward County office will host an additional AOR workshop in Hollywood, FL on March 11, 2009. Tallahassee staff will be in attendance for EAOR training. Registration information and details are available on our website:
<http://www.dep.state.fl.us/air/eproducts/eaor/default.htm> or contact Paul Shelton at (954) 519-1444 or PSHELTON@broward.org. Additionally, if any other offices are interested in hosting a workshop, please let me know.
- ☐ We are currently considering providing EAOR Reviewer NetMeeting-based training sessions to district and local users. Please let me know how many of you would be interested in trainings such as these.

Please let me know if you have any questions or concerns. Thank you.

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March 2010 AOR Teleconference

SUMMARY OF AOR TELECONFERENCE

1. Attendance—Palm Beach County is the only office that did not attend.
2. New version of EAOR reviewer—We will get a release to test either 3/6 or 3/9. The target date for production is 4/1. Districts and locals can view the 2008 data with the current version of EAOR reviewer. But the current version is lacking some of the new data and new edit checks. Better to wait to verify the data, since districts and locals will need to re-verify the data using the new version of EAOR reviewer, once it is available.
3. Review timeline—Upload all data by 6/30, finish edit checks by 9/30. DARM will add additional staff to review and upload the data in the shortened time period.
4. Expectations for districts and locals—If any office wants to review the data from their facilities before DARM reviews and uploads the submissions, the district or local needs to contact DARM to set up a schedule. The schedule must allow time for DARM to review and upload the data before 6/30 (i.e., the district or local should make continual progress on the reviews, and not wait until the middle or end of June before reviewing). Contact DARM by Friday, March 6 if your office wants to review the submittals prior to DARM review and upload.
5. Post-upload changes—After DARM uploads the data, districts and locals can still review their facilities' submissions. If the district or local finds a problem and needs to make changes to a facility, request DARM to release that particular facility. This is the only case that DARM will release the data to avoid unnecessary repeat of the upload process. In other words, DARM will not release all of an office's facilities after DARM has already reviewed and uploaded—but DARM will release individual facilities upon request.
6. AOR/EAOR FAQ—DARM has been working on creating a FAQ to be posted on the EAOR website. DARM welcomes comments from districts and locals. DARM will e-mail a copy of the FAQ when it is ready; be sure to ask additional questions so that DARM can add new questions to the list as the review process continues.
7. March 11 Workshop—DARM will not physically be at the meeting because of DEP travel restrictions. DARM has been working with Broward County to resolve technical issues with Netmeeting; the plan is to use teleconferencing and Netmeeting to cover the EAOR training (including the new reporting requirements for the 2008 AOR). Districts and locals are encouraged to suggest any other training options for the future since travel will likely be very limited.
8. Submittals to Date—DARM has received 330 AOR submittals as of today.
 - 324 EAOR submittals
 - 5 e-mails
 - 1 floppy disk
 - 135 signature pages (which will be forward to districts and locals next week)

April 2010 AOR Teleconference

We will not have a teleconference this month. The next meeting will be on May 4.

1. The deadline to submit 2009 AORs has passed. DARM has received 1017 EAOR submittals to date:
 - 953 web submittals
 - 39 emails
 - 4 disk
 - 21 paper submittals processed in EAOR
2. DARM will refer all questions and requests to the district/local offices in reference to the following issues:
 - Facilities requesting an extension for the submission of their AORs
 - Facilities inquiring as to whether or not to submit an AOR if they shutdown during the reporting year. (A facility that shuts down during the reporting year is still required to submit an AOR covering the period of time that it was operating. It is at your discretion whether to pursue enforcement if the facility does not submit the AOR).
3. 2008 AOR Review
 - Please use the EAOR Review Status Report to see who has submitted AOR thus far. You may want to start contacting facilities if an AOR has not been received.
 - We have processed all disk and email submittals we have received here, thus far. If you receive a disk or email submission, please email it to Cadedra Parmer Hodge at Cadedra.Parmer@dep.state.fl.us so that it can be imported into EAOR.
 - DARM will be reviewing and uploading the AORs for all facilities except those facilities within offices that have informed us that they want to review their data first. These offices are: CDOR, NEDV, SEBR, SED, SWPN, and SWSA. We have begun reviewing the data here in Tallahassee. I will provide you the status report next week.
 - If your EAOR Reviewer performance, especially for the local programs, at any point in time appears to be slower than normal or if you encounter problems, please let me know.
4. Signature Pages – We are continuously forwarding signature pages onto you as we receive them. As mentioned during a previous teleconference, starting this year we will also scan and attach signature pages as well as additional attachments in EAOR

Remember the AOR is not complete until it is signed. We currently do not have electronic signature availability but we plan to in the future. For now, hardcopy is the only option. DARM will not pursue missing signature pages because we feel that this is a compliance issue not an

inventory issue. As far as requiring signature pages for revisions, we are leaving this up to the district and local offices.

5. EAOR Reviewer Training – If you are still interested in this training, please let me know. It is possible for us to arrange a webinar training before mid-April.

Thanks.

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May 4, 2010 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. The following offices were absent: NEDV, SD
2. Status of 2009 AOR Review - As of May 7, approximately 38% of the facilities in EAOR have been uploaded into ARMS. Please see the detailed review status below. Our goal to complete the review and upload of all data is June 30. If you plan to process paper AORs in EAOR, please do so by June 30 (keeping in mind that we will still need time to review and upload the data into ARMS).

The next phase will be the edit checks. The edit check process is normally done once all of the data for your office is uploaded into ARMS. The deadline to complete edit checks is September 30.

3. EAOR Reviewer – Useful features of the software were demonstrated (i.e. reviewing revisions, replacing facility/EU, EAOR review status reports, etc.). Instructions and details on these features can be found in the EAOR Reviewer Supplemental Manual located here:
http://approd.dep.state.fl.us/arms_reports/eaor/Software/Download.asp
- 4a. If a non-Title V, non-synthetic minor facility has its permit modified to remove the requirement to submit an AOR, then that facility no longer needs to submit an AOR. It does not need to submit "one last" AOR to report emissions for the portion of the year prior to the permit revision.
- 4b. When entering facility data into ARMS for a new minor facility, you should not enter a limit of 100 tons per year unless the permit actually has a limit of 100 tons per year. There are other reports and checks that can be done to search for minor facilities that emit over 100 tons; you should not enter a "fake" emission limit so as to catch the facility during the AOR edit check process.

Thanks.

Office	Total	Paper	Reviewed by DARM	Reviewed by D/L	Uploaded	% Uploaded
CD	122	3	26	42	21	17%
CDOR	67	6	25	43	14	21%
NED	76		36		34	45%
NEDV	64		18	38	17	27%
NWD	45	1	40	10	32	71%
NWDP	30	2		27	0	0%
NWDT	22	1		21	0	0%
SD	44		24		19	43%
SEBR	61	2	26	34	13	21%
SED	43	1	37	40	28	65%

SEDA	79	5	55	41	51	65%
SEPB	44		20		19	43%
SWD	182	16	89	16	79	43%
SWHI	117	1	73	1	62	53%
SWPN	69	5	16	61	13	19%
SWSA	11	3	11	11	11	100%
Total	1076	46	496	385	413	38%

Paper = accounts for only paper submissions that have been processed in EAOR

Reviewed by DARM = reviewed by Inventory group in Tallahassee (many with prior review by D/L)

Reviewed by D/L = reviewed by D/L, subsequent review by DARM unnecessary (if uploaded) or pending (if not uploaded)

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June 1, 2010 AOR Teleconference – Cancelled

The regularly scheduled AOR Teleconference scheduled for June is cancelled.

1. AOR Review Status. As of today, approximately 60% of the facilities have been reviewed and uploaded into ARMS. Please see the status report below for additional details. Remember our goal to complete the review and upload of all facilities is June 30.
2. Paper AORs. Please process all paper AORs in EAOR or ARMS by June 30. However, please keep in mind that if processed in EAOR, we will need time to review and upload the data into ARMS.
3. Edit Checks. The next step after all of your facilities have been uploaded into ARMS is the Edit Check process. The deadline to complete the 2009 AOR Edit Check & Review process is September 30. As in the past, the date done should not be entered in ARMS until after the edit check and compliance determination is complete

Thanks.

Office	Total	Paper	Reviewed by DARM	Reviewed by D/L	Uploaded	% Uploaded
CD	125	5	54	89	50	40%
CDOR	69	8	57	63	47	68%
NED	82	5	47		39	48%
NEDV	65		44	45	42	65%
NWD	46	1	40	10	35	76%
NWDP	30	2	26	28	9	30%
NWDT	22	1	21	21	10	45%
SD	43		35		32	74%
SEBR	61	2	54	53	31	51%
SED	43	1	43	40	36	84%
SEDA	86	12	70	55	64	74%
SEPB	44		20		20	45%
SWD	182	16	129	16	118	65%
SWHI	119	2	93	2	81	68%
SWPN	69	5	32	67	31	45%
SWSA	11	3	11	11	11	100%
Total	1097	63	776	500	656	60%

Paper = accounts for only paper submissions that have been processed in EAOR

Reviewed by DARM = reviewed by Inventory group in Tallahassee (many with prior review by D/L)

Reviewed by D/L = reviewed by D/L, subsequent review by DARM unnecessary (if uploaded) or pending (if not uploaded)

Cadedra Parmer Hodge

July 2010 AOR Teleconference

Hello all,

The regularly scheduled AOR Teleconference scheduled for July (July 6) is cancelled.

1. AOR Review Status. As of today, approximately 86% of the facilities have been reviewed and uploaded into ARMS. Please see the status report below for additional details. Our goal was to complete the review and upload of all facilities by June 30, but with some key personnel out of the office, we still have some facilities to review and upload. See below for a list of facilities for which we (DARM) are waiting on input from you (district or local) before we can proceed. Please respond to our requests for information as soon as possible so we can keep the review and upload process moving forward.
2. Edit Checks. The next step after all of your facilities have been uploaded into ARMS is the Edit Check process. The deadline to complete the 2009 AOR Edit Check & Review process is still September 30. (You may want to wait until the upload is complete for your office before you start your edit checks.) As in the past, the date done should not be entered in ARMS until after the edit check and compliance determination is complete.
3. Copy Me (Greg) on Correspondence. Cadedra will most likely be returning to the office sometime in August. In the meantime, please copy me on any e-mail correspondence you are sending her way so that I can follow up on the issue or route it to someone who can.

Thanks.

~ Greg DeAngelo

AOR REVIEW STATUS REPORT

Office	Total	Paper	Uploaded	Pending	Uploaded
CD	132	12	111	21	84%
CDOR	71	10	69	2	97%
NED	83	6	75	8	90%
NEDV	65	0	63	2	97%
NWD	46	1	40	6	87%
NWDP	30	2	23	7	77%
NWDT	22	1	19	3	86%
SD	43	0	41	2	95%
SEBR	63	3	52	11	83%
SED	43	1	41	2	95%
SEDA	89	14	73	16	82%
SEP	44	0	32	12	73%
SWD	184	17	160	24	87%
SWHI	120	3	111	9	93%
SWPN	69	5	42	27	61%

SWSA	11	3	11	0	100%
Total	1115	78	963	152	86%

Legend:

Total : Number of facilities submitted AOR

Paper : Number of paper submittals

Uploaded : Number of facilities that have been reviewed and uploaded to ARMS database

Pending : Number of facilities that are being process either by Tallahassee Office or District and Local Offices

Uploaded : Percentage of facilities that have been uploaded to ARMS database

FACILITIES NEEDING DISTRICT/LOCAL ACTION

FACILITY OFFICE	FACILITY ID NO	OWNER NAME	SITE NAME	DARM CONTACT PERSON
NED	0890428	NASSAU CO. BOARD OF COUNTY COMMISSIONERS	WEST NASSAU LANDFILL	Kelly Stevens
NED	0010041	N. FLA/SOUTH GA VETERANS HEALTH SYSTEM	GAINESVILLE	Kelly Stevens
SWD	0810215	GULFSTREAM NATURAL GAS SYSTEM	GULFSTREAM NG COMPRESSOR STA 420	Will Sexton
SWD	1050076	INTERNATIONAL PAPER	AUBERNDALE	Will Sexton
SWD	1050250	AMERICAN ENVIRONMENTAL CONTAINER	AMERICAN ENVIRONMENTAL CONTAINER	Will Sexton
SWHI	0570262	Chromalloy Casting Tampa Corporation		Kris Lanh
SWHI	0570454	Lear Corporation		Kris Lanh
SWHI	0571274	Vulcan Material Company		Kris Lanh
SWHI	0570141	US Air Force	Mac Dill AFB	Kris Lanh
SWHI	0571151	International Paper Company		Kris Lanh
SWHI	0570005	CF Industry	Plant City Phosphate	Kris Lanh
NEDV	0310556	Omega Partners	Jacksonville Terminal	Kris Lanh
CDOR	0950059	Conrad Yelvington	Conrad Yelvington	Lisa Fulton

August 3, 2010 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Status of 2009 AOR Review - As of Aug 3, almost all facilities have been uploaded. The group discussed the few remaining facilities.
2. The next step after all of your facilities have been uploaded into ARMS is the Edit Check process. The deadline to complete the 2009 AOR Edit Check & Review process is still September 30. (You may want to wait until the upload is complete for your office before you start your edit checks.) As in the past, the date done should not be entered in ARMS until after the edit check and compliance determination is complete.
3. Sarasota County is the only office that has completed the edit check process. As a reminder, after you have completed your edit checks and you believe your office is "done," send Cadedra an e-mail and she will confirm that you have completed the edit check process.
(Cadedra.Parmer@dep.state.fl.us)

Thanks!

September 2010 AOR Teleconference

The regularly scheduled AOR Teleconference for September is cancelled. The deadline to complete the 2009 AOR Edit Check & Review process is September 30, 2010.

1. As of today (September 3), DARM has confirmed that the following offices have completed the 2009 AOR Edit Checks and Review: NEDV, SWPN, and SWSA

If you think your office has finished the AOR Edit Check and Review, please send me an email so I can review and confirm your status.

2. The following facilities are still on hold (awaiting further action from the district/local office):

CD	'0950113	ORANGE COUNTY SOLID WASTE MGT. FACILITY	Web	3/11/2010	Ready for Review	7/7/2010	MIESEL_T
SEPB	'0990646	FP&L / WEST COUNTY ENERGY CENTER	Web	3/31/2010	Ready for Review	8/31/2010	PARMER_C
SWD	'1050233	POLK POWER STATION	Web	3/5/2010	Not Verified	8/27/2010	SCHROEDE R_B
SWHI	'0570262	CHROMALL OY CASTINGS TAMPA, CORPORATI ON	Web	3/30/2010	Not Verified	6/7/2010	LANH_K

October 2010 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. Offices that were absent: NEDV, SD, SED, SWPN, and SWSA

2. The deadline to complete the 2009 AOR Edit Check & Review process has passed. NED and NWD are the only offices that have not been confirmed as complete. If you think you are complete, please email me so I can confirm.

3. The next step in the AOR process is preparation for the 2010 AOR.

Data Cleanup Reports - are tentatively scheduled to be sent out no later than November 1st to all offices. I will run the reports again on December 1st to ensure that nothing has been missed. Additional details will be provided when I send the reports.

Enhancements for EAOR for the 2010 Reporting Year – These enhancements include Windows 7 compatibility and the incorporation of electronic signature. Testing for both enhancements are still underway and the new version including these updates should be available for industry to download and install later this year.

Electronic Signature – Although users will only be able to electronically sign an AOR for reporting year 2010 and after, they could sign up for an account if they do not have one and get a pin now. A user account and PIN are required to electronically sign an AOR. If a user already has an EPSAP account and PIN, he does not need a new one. User accounts can be registered and a pin request form can be downloaded from here: <http://www.dep.state.fl.us/air/emission/eaor/default.htm>. Details and additional information about the new EAOR electronic signature can be found here: <http://www.dep.state.fl.us/air/emission/security/NewUser.asp?app=3> (click on the Help button located in the top right corner of the page).

AOR Letters - We are planning to send out letters to the facilities that are required to submit an AOR. These letters will be sent out December 2010. We will provide more details at a later time.

4. AOR Edit Reports – I just want to remind everyone that these reports are intended for internal use to serve as prompts to further investigate the AOR data reported and determine whether a compliance issue actually exists. If, in fact, you need to contact the facility about an issue on these reports, I highly recommend that you do not provide them with copies of these reports (they are not definitive and are not as easy for them to interpret). I suggest you show them the limits defined in their permit and show them what they reported on their AOR.

If you have any questions, please feel free to contact me if you have questions. Thanks.

Cadedra Parmer Hodge
Environmental Specialist
Florida Department of Environmental Protection
Division of Air Resource Management
Phone: (850) 921-9590

November 2010 AOR Teleconference

The regularly scheduled AOR Teleconference scheduled for November is cancelled.

1. 2009 AOR Edit Check & Review Process - The deadline to complete this has passed. All offices have been confirmed as complete. Thanks to each of you for getting this done in a timely manner.

2. Data Cleanup Reports - The next step in the AOR process is preparation for the 2010 AOR. I will e-mail the data cleanup reports later today.

3. EAOR Facility Version Training - We are planning to provide EAOR training to industry next year, prior to the 2010 AOR deadline. We are looking into whether or not we can hold this training in Orlando or Tampa but due to budget constraints, it will likely be a web-based training.

If you have questions or comments, please feel free to contact me directly.

Thanks.

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Environmental Specialist

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December 2010 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. The following offices were absent: CDOR, NEDV, SEBR, SED, and SWSA.

2. 2010 AOR Preparation

Data Cleaning Reports. A second set of data cleaning reports were sent December 6 to address any items that were missed in the first set of reports that were sent out early November. Please try to complete this set of data cleaning reports no later than December 15, 2010. Thanks to each of you for your cooperation!

We will send a one page letter to facilities required to submit a 2010 AOR later this month. All the information they need will be available on the EAOR website (<http://www.dep.state.fl.us/air/emission/eaor/>).

The AOR Required field in ARMS will be used to generate the mailing list for these letters. The following facilities with an AOR Required = Y in ARMS are included on the list: (a) facilities with an "Active" or "Construction" status and (b) facilities with an "Inactive" status and a final shutdown date of this year. With this in mind, if there is a facility that has an "Inactive" status and operated during 2010 and you would like for it to report a 2010 AOR, please be sure to enter a final shutdown date of this year in ARMS.

As a reminder, a facility that shuts down during the reporting year is still required to submit an AOR covering the period of time that it was operating. If a facility calls DARM inquiring as to whether or not it has to submit a 2010 AOR if it shutdown during the reporting year, we will remind the facility of their obligation and forward the call to the appropriate district or local program office for follow-up. It is at your discretion whether to pursue enforcement if the facility does not submit the AOR.

The updated EAOR Facility Version will be available early January 2011. The updated EAOR Reviewer Version will be available early 2011.

3. EAOR Facility Version Training. We will host an EAOR Training in Tallahassee, FL on February 23, 2011 from 1 PM – 5 PM. This is the version of EAOR software used by regulated industry and consultants, but district/local staff are welcome to attend. In addition, the training will simultaneously be broadcast via a webinar. Registration details and more information will be available on our EAOR website by the end of month.

4. AOR Calendar. AORs are a year-round process. It is important that each party involved does its part in order to make the review process a success. Attached is an AOR Calendar which outlines what needs to be done and by when. Please try and keep these tasks and dates in mind as you plan your workload throughout the year. Please review it and feel free to contact me directly if you have any questions or comments/suggestions.

Thanks.

Cadedra Parmer Hodge

January 2011 AOR Teleconference

We will not have a teleconference this month. The next meeting will be on February 1.

1. 2010 AOR Status

In December 2010, AOR letters were mailed to all facilities that are required to submit an AOR for the 2010 reporting year. I emailed you a copy of the letter. If anyone still needs a copy, please let me know. Our website will be updated after January 4, 2011 to reflect important details and information relative to the AOR for the 2010 reporting year: <http://www.dep.state.fl.us/air/emission/eaor/default.htm>.

A new version of EAOR Facility will also be available at the website at that time. Please note that facilities must install and use this version to submit their AORs for the 2010 reporting year. This version incorporates the electronic signature and is compatible with Windows 7. Keep in mind that this is the EAOR for facility use and not for us to look at the data. Revisions to the EAOR Reviewer are forthcoming to incorporate changes that are consistent with EAOR Facility; we will notify you when this new version is available. However, you may still use the current version of EAOR Reviewer to look at the data that is being submitted by facilities.

Remember the deadline to submit the 2010 AOR is April 1, 2011, according to Rule 62-210.370, F.A.C.

2. Training to Industry. We will provide an EAOR training to regulated industries and consultants. The training will take place on Wednesday, February 23, 2011 from 1:00 PM to 5:00 PM (EST). There are two options available to attend: in person or via webinar. Details on registration will be available on the website after January 4, 2011.

Please let me know if you have any questions or concerns. Thank you.

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February 2011 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. The following offices were absent: CD, SEPB

2. Electronic Signature. For AORs for report years 2010 and later, if the AOR is submitted electronically via the web, disk, or email, the facility is required to sign the AOR electronically. Submitting the first two pages hardcopy is not acceptable. The AOR is not complete until it is signed. In order to sign electronically, the facility will need to have an account and a PIN. If you or the facility have questions about the electronic signature process, please contact me.

If you receive any hardcopy signature pages (aside from those AORs submitted as hardcopy), please contact me.

3. EAOR Reviewer Software. The new version of the EAOR Reviewer software is now available: http://appprod.dep.state.fl.us/arms_reports/eaor/Software/Download.asp. Please have your IT staff to install it. You can still use the earlier version for now; however, after February 15th, you must have the new version installed in order to view the data. Please let us know if you encounter any problems or have questions.

We plan to provide EAOR Reviewer training to interested offices sometime in March. We will provide details at a later time.

4. Expectations for District and Local Programs (Review Process). Please refer to AOR Calendar (attached) for key dates and tasks to keep in mind.

5. Submittals to Date – DARM has received 93 submittals, 40 of which have been electronically signed
92 Web submittals

1 Paper

6. EAOR Facility Version Training. We will host an EAOR Training in Tallahassee, FL on February 23, 2011 from 1 PM – 5 PM. This is the version of EAOR software used by regulated industry and consultants, but district/local staff are welcome to attend. In addition, the training will simultaneously be broadcast via a webinar. Registration details and more information are available on our EAOR website: <http://www.dep.state.fl.us/air/emission/eaor/default.htm>.

Thanks.

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March 2011 AOR Teleconference

Thank you for participating in the meeting. Here is a brief summary.

1. SEDA was the only office that was absent.

2. AOR Electronic Signature. For the 2010 report year, if for some reason a facility is not able to electronically sign its AOR (web, e-mail, and disk submissions), we will not enforce the electronic signature. However, we strongly emphasize that the owner/authorized representative should register for an account and request a PIN sometime during the year. We do not expect to accept hardcopy signature pages for electronic submissions for the 2011 report year.

DARM has received some hardcopy signature pages. We have begun processing them and will forward them onto you. We are scanning and attaching the signature pages in EAOR Reviewer as well. With the implementation of the electronic signature, the capability to record a signature page date in EAOR Reviewer was removed. So you will not be able to maintain a record of hardcopy signed AORs within the EAOR software.

Please take into consideration that the implementation of electronic signature for AORs is new, and that it can take several days for the facility to set up a PIN so they can sign electronically. We expect that many facilities will end up submitting their AOR on time but may experience difficulty as the deadline approaches with getting their electronic signature in on time. Given that this is the first year for the electronic signature, we are encouraging compliance offices to take an enforcement discretion/compliance assistance approach towards any late submittals for AOR that are submitted on time but the signature is received late.

3. EAOR Reviewer Training. DARM is hosting an EAOR Reviewer training via webinar on Tuesday, March 22, 2011 from 9 AM to 11:30 AM. The following offices have expressed an interest in the training: CDOR, NED, NEDV, NWD, SD, SEBR, SED, SEPB, SWD, and SWHI. If your office is interested in attending but is not listed, please let me know.

4. Expectations for districts and locals. The following offices have informed DARM that they will review their AOR submittals prior to DARM review and upload: CD, CDOR, SEBR, SEPB, SWHI, SWPN, and SWSA. A review schedule (percent completion by certain dates) will be sent to each of these offices by the end of next week. Please adhere to these milestones in order to maintain continual progress and attain our goal to have all of the data uploaded by 6/30.

Remember that you are not required to review the EAOR submittals prior to the DARM review and upload. You can review the submittals when your time, resources, and schedule allow. But, if a facility's submittal has been uploaded into ARMS and you need to make some changes, you will need to notify DARM to request that it is released.

5. Submittals to Date – DARM has received 268 submittals thus far.

259 web

1 email

1 disk

7 paper copies have been processed in EAOR

6. DARM will refer all questions and requests to the district/local offices in reference to the following issues:

Facilities requesting an extension for the submission of their AORs

Facilities inquiring as to whether or not to submit an AOR if they shutdown during the reporting year

7. AOR Required Field (ARMS). DARM is proposing changing the current AOR required field in ARMS to reflect numerical values that indicate why the AOR is required instead of yes or no (i.e., 0 = not required, 1 = required because Title V, 2 = required because synthetic minor, 3 = required because of VOC or NOX emissions, 4 = required by district office or local program permit, etc.). The details and specifics have not been worked out but this change will likely affect EAOR, EPSAP and some of the ARMS reports.

Thanks.

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April 2011 AOR Teleconference

We will not have a teleconference this month. The next meeting will be on May 3.

1. The following offices have informed DARM that they will review their AOR submittals prior to DARM review and upload: CD, CDOR, SEBR, SEPB, SWHI and SWPN. A review schedule (percent completion by certain dates) has been sent to each of these offices. If you have not agreed to the suggested schedule, please do so by the end of the day or provide recommendations for an alternative schedule.

Please adhere to these deadlines in order to maintain continual progress and attain our goal to have all of the data uploaded by 6/30.

2. Submittals to Date – DARM has received 912 electronic submittals as of today, 486 have been signed electronically.
 - 887 EAOR submittals
 - 24 emails
 - 1 floppy disk

If you have any questions, please feel free to contact me directly. Thanks.

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