

Annual Emissions Inventory Frequently Asked Questions March 2024

### General

#### When are the training workshops?

ADEQ will post workshop details in the **Workshops** section of our EI reporting home page each March - <u>www.azdeq.gov/emissions-inventories</u>. Slide decks and recordings of previous workshops are also available there. You can also find instructions to subscribe for text or email notifications whenever we post workshop details, so you'll never miss an update.

#### When is my inventory report due?

June 1st, 2024

#### I am not going to make the submittal deadline. What should I do?

As soon as you anticipate the need to submit later than June 1st, please email EmissionInventory@AZDEQ.gov to request an extension. Extensions are not guaranteed; however, permit holders with a history of consistently submitting their reports prior to June 1 in previous years may be granted a 30-day extension.

#### How do I confirm ADEQ received my submittal?

If you submit your inventory report via email, ADEQ's emission inventory team will write you back to confirm receipt. If you use any other submittal method, you may write to EmissionInventory@AZDEQ.gov to request a status update.

### What Operations Must Report?

#### Do I need to submit an inventory report for my ADEQ air permit every year?

Not necessarily. You can learn more and consult this year's required reporters list by downloading this guide: <u>https://static.azdeq.gov/aqd/ei/reporting\_guide.pdf</u>

#### I am not a Title V facility. Do I need to submit an inventory report?

The inventory reporting program currently covers all Class I and Class II ADEQ air permit holders, including all ADEQ Air General Permits. Registration holders typically do not have to report unless located in an ozone planning area. If you are

unsure, then consult this year's list: https://static.azdeq.gov/aqd/ei/reporting\_guide.pdf

#### My permit status changed (issued/terminated) recently. Do I need to report?

If your permit was open for any portion of 2023, or if you operated in any portion of 2023, then you may be required to submit an emission inventory report. this is especially likely, of a permit that was newly issued in 2023. If you are unsure, then consult this year's list: <u>https://static.azdeq.gov/aqd/ei/reporting\_guide.pdf</u>

#### What should I do if my facility was shut down?

If you are not required to report your 2023 emissions, even if you had operated, then no action is needed. If you are required to report 2023 emissions, but either you did not operate at all in 2023 or your total emissions were under all applicable reporting thresholds, then you may instead submit a *Facility Status* form: https://static.azdeq.gov/forms/nonoperational.pdf

#### Do I need to provide evidence that my facility was under the threshold?

Please use the Facility Status form to briefly describe why facility emissions were under the threshold. If ADEQ needs additional information, we will contact you.

#### Why didn't I receive my notification letter?

If you did not receive a letter from ADEQ in February or March, your contact information may be out of date. Note that ADEQ sends all notification letters by email, not by postal mail. If you were expecting to receive a notification letter but did not, or if the letter(s) you received did not list all of your permits, then please write to EmissionInventory@AZDEQ.gov for clarification. Failure to receive a notification letter does not waive the reporting requirement.

#### Should I use my new permit number or the one from my notification letter?

If your permit number has recently changed, then please use the number in your notification letter when you report this year. If you are unsure, then please include both.

#### I have two operations under one permit, Should I submit two inventories?

No. Please submit one emission inventory report per permit.

#### I have a portable unit that operated in multiple locations. Do I need to submit an inventory for each location?

Only if you have multiple permits to cover the operation. Please submit one emission inventory report per permit.

### **Reporting Methods**

#### Do I report to SLEIS, IMPACT, or CAERS?

If you have a Class I air permit issued by ADEQ, or if you reported using SLEIS or CAERS in 2023, then your facility must use CAERS in 2024.

If your permit was issued by Pima County, then you must also use CAERS if it is a Class I permit.

If your permit was issued by Maricopa County, then you may need to submit a report using IMPACT. If you to have a Maricopa County permit but you are not sure whether or not you must report for 2023 in particular, then please contact EmissionsInventory@maricopa.gov. If your permit was issued by some other entity, then please contact them for reporting details.

#### Should I report using a web portal or by emailing in an Excel form?

Major sources, as defined in R18-2-101(75), are required to submit their annual emission inventories through the State and Local Emission Inventory System (SLEIS) at sleis.azdeq.gov, or, starting in 2024, through the Combined Air Emissions Reporting System (CAERS). Minor sources such as Class II air permit holders are encouraged to use the *preferred reporting form* in a spreadsheet application (for example, Excel) and then email the completed, signed form to EmissionInventory@azdeq.gov instead of reporting via the SLEIS or CAERS web systems. However, if your facility has previously reported using SLEIS or CAERS, then you should continue to report using CAERS starting in 2024.

If you hold an air general permit for crushing and screening; concrete batch plants, or hot mix asphalt plants, then you should instead report via the myDEQ web portal.

#### How do I complete my inventory through myDEQ?

If you hold a rock product air general permit, then you are already required to submit a year-end compliance certification each January via myDEQ (<u>https://is.azdeq.gov/</u>). When you complete that certification, myDEQ will present you with an inventory report that includes estimates based on your compliance certification data for the entirety of 2023. If you agree that the auto-generated report is representative of your emissions, then you may certify it as-is. Otherwise you must provide your estimates *and* email <u>EmissionInventory@azdeq.gov</u> to justify the new estimates.

#### Where do I find the preferred reporting forms?

#### https://static.azdeq.gov/forms/ei minor sources reporting.xlsx

#### I don't have Excel. What should I do?

If you can't use another application such as Google Sheets or LibreOffice Calc to edit the worksheets, then please download the PDF version of the form instead. You can find it at <u>https://static.azdeq.gov/forms/ei\_single\_form.pdf</u>.

#### Do I have to use the forms or can I report using a different methodology?

If your emissions-generating operations are difficult to describe using the preferred reporting forms, then you may submit a custom estimate to ADEQ for consideration. However, ADEQ may ask for additional information or even reject the report.

#### Where do I submit my report(s)?

CAERS reports must be submitted via CAERS itself, and similarly for myDEQ. For all other methods, please email the completed, signed reports to EmissionInventory@AZDEQ.gov.

#### Is a scanned signature acceptable?

Yes. For emailed submission methods, ADEQ will accept either a valid digital signature or a scanned signature.

### **Using CAERS**

#### How do I create a new user account?

Due to the transition from SLEIS to CAERS, this process is currently in flux. Please email <u>EmissionInventory@azdeq.gov</u> for assistance.

#### How do I become a submitter for my CAERS facility?

The only people who may certify and submit a report for your facility in CAERS are the responsible official(s) on record with ADEQ for your facility's air permit, responsible officers for the facility's controlling enterprise as listed in myDEQ, or the explicit designees of those persons. Please keep responsible official information up to date both in myDEQ and with the ADEQ air permits team.

#### How do I change my air permit's primary responsible official?

If you manage your permit through myDEQ, then as a first step, you should follow myDEQ's application process for changing the responsible officer for the facility's controlling enterprise. Please also notify the permits team directly at AirPermits@azdeq.gov in order to update the responsible official(s) listed for the air permit itself. Once those two steps are complete, the new official can certify/submit CAERS reports or formally delegate that authority to someone else.

#### I got locked out of CAERS, how do I reset my password?

For technical issues related to CAERS or CDX, please email <u>nodehelpdesk@epacdx.net</u>

#### **Do I have access to CAERS?**

If you are unsure whether you have a CAERS account or which of your email addresses is associated with your current account, please email EmissionInventory@AZDEQ.gov and provide your first and last name (including any prior names that you might have used when signing up for an account); any facilities or permits with which your account may be associated; and then indicate that you would like to know if you have a CAERS account and its associated username.

#### **Do I report HAPs individually or collectively?**

We strongly encourage you to report individual HAP emissions estimates. If this is difficult or impossible, then please report total HAPs instead. In either case, make sure to include HAPs in your inventory if they exceed the reporting thresholds.

#### What are the reporting thresholds for HAPs?

In general, the reporting thresholds for HAPs are the same as for all regulated air pollutants in Arizona. Any individual pollutant emitted in excess of 1 ton per year or any collection of pollutants emitted in excess of 2.5 tons per year must be included in your report. There is an exception for lead (Pb), for which the individual threshold is 0.6 tons per year.

## **Using Preferred Reporting Forms**

# I don't know the place ID for my facility. Do I need to include this ID with my submittal?

If you know your permit number but not your place ID, please don't guess. Fill in the permit number and leave the place ID blank. If you don't know either, please email EmissionInventory@AZDEQ.gov to ask for the place ID and permit number. Please provide as much identifying information about your operation as possible.

#### What goes in the ATO space for generators?

If ADEQ issued an Authorization to Operate (ATO) the equipment as an accessory to your permit, then please use the number shown at the top of the ATO issuance letter. If the equipment is not the subject of an ATO, or if you are not sure, then please leave it blank.

## Should all engines (including hydraulic systems) be included in the "generators" section?

Any internal combustion engines other than those used to propel a vehicle should be included, whether they are stationary, on skids, or mobile.

#### Should nonroad engines not in my permit be reported?

Yes. They should be treated as described above. Any emissions-generating equipment or activities that you can easily provide accurate data for should be included in your report, whether explicitly included in your permit or not.

#### Should I include storage piles in my inventory?

Rock products storage piles or piles with comparable wind erosion properties should be included. If you are unsure, then email EmissionInventory@AZDEQ.gov.

#### Why is the minor source inventory form asking for a password?

You may be inadvertently trying to modify structural protections of the Excel form. If the problem persists, then consider using the PDF version of the form instead, or email EmissionInventory@AZDEQ.gov for technical assistance.