

January 9, 2019

Bureau of Air Management: 2018 Annual Reporting Notice

Dear Owner/Operator of a Title V Source:

In accordance with section 182(a)(3)(B) of the Clean Air Act and section 22a-174-4(d)(1) of the Regulations of Connecticut State Agencies (RCSA), the Department of Energy and Environmental Protection (DEEP) is requiring the submission of emissions statements and compliance reports. These are required for each facility that operated pursuant to a Title V permit at any time during calendar year 2018. Emissions statements are also required from each new Title V source that has yet to obtain a Title V permit or from facilities requested by DEEP to submit emission statements for other reasons. For the 2018 reporting period, the web-based Emissions Inventory Tracking System, called EMIT Online, is DEEP's designated method to create and submit an official record of emissions to satisfy RCSA section 22a-174-4(d)(1) consistent with the Connecticut Uniform Electronic Transactions Act. EMIT Online allows online access to emissions-related data, as well as the ability to edit, save and submit your emissions data electronically to the DEEP.

For calendar year 2018, each reporting facility must quantify and report actual emissions of the following pollutants from each source at the facility: oxides of nitrogen, volatile organic compounds, sulfur dioxide, particulate matter, carbon monoxide, lead, ammonia, and hazardous air pollutants (HAP). With respect to particulate matter, each facility shall quantify and report PM10 primary emissions, PM2.5 primary and ammonia emissions. To facilitate HAP emissions reporting, EMIT contains the U.S. Environmental Protection Agency's (EPA's) default HAP emissions factors. Attached to this letter is additional guidance on emissions reporting. In addition, DEEP staff will be available to answer your questions and assist you with any issues related to your emissions data reporting.

The annual emissions statements for Title V facilities will provide the basis for assessing emissions fees pursuant to RCSA section 22a-174-26(d). All Title V emissions statements must present the actual calendar year 2018 emissions and typical summer ozone season daily emissions of specified pollutants. The emissions estimates must also include emissions from startups, shutdowns and malfunctions.

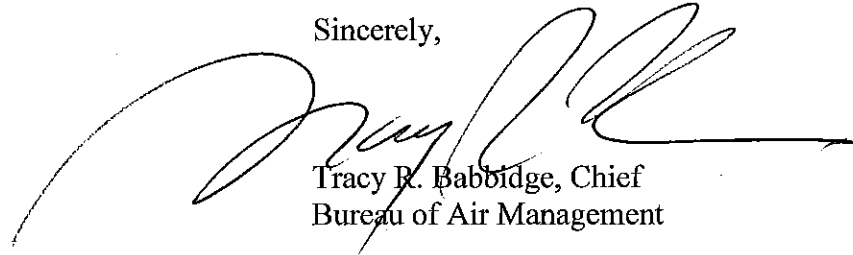
The EMIT system has been updated to improve data validation for users, track emissions for hazardous air pollutants, and has been populated with current EPA emission factors. As always, please pay particular attention to the emissions data, emissions factors, and source list presented in your emissions statements.

Emissions statements and compliance reports must be filed with DEEP by March 1, 2019.

Title V emissions statement compliance reports are accessible at <https://filings.deep.ct.gov/DEEPPortal/>. When accessing the new version of EMIT, **please use the Google Chrome browser**, not Internet Explorer. If you have not yet created an ezFile account, or you are a first-time EMIT user, you must provide your ezFile information to DEEP, to allow an EMIT administrator to map the ezFile account to your EMIT account(s). Please review the attached EMIT guidance document for assistance with new account creation, difficulties with logging in, or other EMIT questions.

If you need additional assistance or have questions about emissions statement reporting, please contact the DEEP eGov Helpdesk between 8:30 am and 4:30 pm Monday through Friday at (860) 424-3882. You can also contact the EMIT Online helpdesk at deep.bam.ts@ct.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tracy R. Babbidge', with a long horizontal flourish extending to the right.

Tracy R. Babbidge, Chief
Bureau of Air Management

TRB:RGR

Attachment

EMIT Online Guidance for Annual Emissions Submitters Reporting Year 2018

The Air Quality Modeling and Emissions Inventory group is leading the annual emissions reporting effort, please help us by attending to a few housekeeping items going forward:

- All parties required to submit shall submit emissions statements electronically for the 2018 reporting season and thereafter. The EMIT portal and its web pages are, in effect, the “forms provided by the Commissioner”. If you need help, we will schedule and provide training as needed for individuals or groups.
- Please review your editor and submitter authorizations for accessing EMIT and make sure that users have created a DEEP ezFile account and provided the account information to DEEP. Also please send updated authorizations for EMIT users to the technical services group of the Bureau of Air Management as needed:
 - Link to: electronic signature authorization forms
 - Please be sure the authorized representative has signed the forms granting his or her approval.
 - Please be sure that you provide ezFile account information to DEEP.
 - Please be clear about any of the following:
 - account deactivations, (submitters and editors),
 - e-mail address updates,
 - site contact updates or any other updates that you would like DEEP to address.
 - Additional information is provided at the end of this attachment to assist in understanding and navigating the DEEP ezFile as it applies to EMIT.
- All reporting for the 2018 reporting season must be completed by **March 1, 2019**. This will allow DEEP sufficient time to process and approve emissions data, and provide billing information to affected sources. This constrained reporting period will allow timely payments by facilities to avoid late charges and penalties required by regulation.
- Please exercise appropriate care when editing emissions data in EMIT, taking care to respond with an accurate, reliable, and defensible submission. Those tasked with editing and submitting responses in EMIT need to know this information is required by their Title V Permits and GPLPE registrations.

The following guidance for reporting Criteria and Section 112 pollutants is provided for sources required to submit an annual report in EMIT:

- 1) Sources at your site that meet the following requirements, should be reported on your annual emission statement:
 - a) Sources in Table II.A of your title V permit with source specific requirements
 - b) Sources operating under a permit-by-rule limit, (i.e. 3b or 3c)
 - c) Any new source that has been added to your site since your Title V permit was issued, that has source specific requirements (i.e. is subject to a New Source Review Permit (NSR), or section 3b or 3c of our regulations, NOx RACT, VOC RACT, etc.)
 - d) Sources already identified at your site in the DEEP inventory

e) Each source or group of similar sources not covered in a) through d), for which the Permittee is subject to State or Federal air regulations requiring periodic recordkeeping of fuel or material consumption and, that emit greater than or equal to 0.5 tons/yr. of actual annual emissions of any one of the following pollutants: NO_x, SO₂, CO, PM₁₀ primary, VOC or lead during the reporting period,

- **This does not include equipment and activities that would be categorized as Trivial Activities in accordance with White Papers 1 and 2, which can be found here: EPA White papers, or a source listed and defined as an Insignificant Emissions Unit in section VI of the Title V application.**

- For example, if you have 3 boilers that collectively emit greater than or equal to 0.5 tons/yr. of actual annual emissions of any one of the pollutants listed above, then these three sources should be reported as a group. Here is a more detailed example; a group of similar sources would not meet this specific reporting criteria if, on an annual basis, they collectively emitted 0.4 tons of NO_x, 0.2 tons of SO₂, 0.1 tons of CO, 0.1 tons VOC, 0 tons PM₁₀ primary, and 0 tons Lead. Similar sources can be reported as a group if they are not subject to source specific requirements listed in Table II.A of your Title V permit. When reporting emissions from a group of similar sources, please maintain a record of how and for which sources these emissions were calculated.

NOTE: When reporting VOC emissions for small unpermitted, unregistered sources, remember it is our primary intent to have an accurate estimation of total VOCs reported for each source or group of sources meeting the reporting criteria. A corresponding representation of HAP emissions should be included if the HAP emissions reporting does not represent a significant burden to the Permittee.

- For Major Sources of HAPs you may report the emissions of just the highest HAP constituent(s) from that source or grouping of sources as the equivalent of Total VOC from that source or grouping of sources.
- For Minor sources of HAPS, that are close to a Major HAP source threshold, and have been avoiding MACT requirements by claiming that potential emissions are below an applicable threshold, there should be a rigorous accounting of HAPs, even from these small sources. To reduce burden, you may report emissions for just the highest HAP constituent(s) in the VOC emissions from that source or grouping of sources as the equivalent of Total VOC from that source or grouping of sources. If there are multiple HAPS that are emitted in quantities close to a Major HAP threshold, then you should demonstrate that each of these individual HAPs aren't triggering any applicable requirements.

f) You need not report emissions for any source or group of sources that satisfy d.) above, and have not emitted at least 0.5 tons/yr. of actual annual emissions of any one of the following pollutants: NO_x, SO₂, CO, PM₁₀ primary, VOC or lead during each of the last 3 calendar years.

NOTE: For each source or group of sources in EMIT at your site, that meet the specific criteria in this section f), please enter zero for that source's activity (e.g. fuel usage), and also enter a note as described in item 2 below to simplify inspections and future reporting. If you have any questions please do not hesitate to contact the technical services group at the Bureau of Air Management.

- For example, if you reported a group of space heaters that are not covered by a) through c) and that, as a group, has not actually emitted more than 0.5 tons/yr. of any one of the listed pollutants during each of the past 3 calendar years, then the group of space heaters does not need to be reported.

- Also, if you reported a source that is not part of a group of similar sources, is not covered by a) through c), and this source has not actually emitted more than 0.5 tons/yr. of any one of the listed pollutants during each of the past 3 calendar years, then the source does not need to be reported.
- If any source or group of sources has been removed from EMIT but now needs to be reported because it satisfies criteria a) through c) or e) above, then **please contact the technical services group at the bureau of air management to restore the source to your site's list of sources in EMIT.**

2) Please apply the following note to the Source Information Tab for a source or a source group that you are reporting zero activity, because the source is below the emissions reporting threshold. This can be accomplished by clicking the Point ID label for the applicable source / source group entry. This will bring up the Notes tab and notes applicable to the Source Information tab. Check for an already existing Emission Reporting Exemption note. If the note already exists then click cancel to stop the addition of the note. If a note does not exist and is desired, then paste the subject provided below into the note subject text block and paste the description provided below into the note description block. This note has description text stating "Please copy this note forward", which DEEP intends to use for automatically populating the notes for the next reporting period. Any notes or replies stating "Please copy this note forward" will be tagged for copy forward and will be copied forward. DEEP hopes to improve the EMIT application to provide users more direct control of this copy forward capability in the future. Click Save to complete the addition of the note. Clicking the Cancel button before saving the note will eliminate the note and all entered data. Clicking the Delete button after saving the note eliminates the note.

- a) *Subject:* Emission Reporting Exemption
- b) *Description:* Emissions for PointId E000X are below the reporting threshold so the activity and emissions are reported as zero in accordance with the reporting instructions. Please copy this note forward.
- c) Termination of the note copy forward or specific challenges with note maintenance can be directed towards the DEEP helpdesk.

Emissions Calculations are to be based on the following listed in order of preference:

- d) CEMs/PEMs monitoring systems that are required by statute, regulation, or Permit or Order condition. Emission data generated by these systems shall serve as the basis for emissions reported in EMIT;
 - e) reference method emission testing that has been deemed by the DEEP to be representative of current and normal operating conditions;
 - f) a facility-specific emission factor, approved by BAM/DEEP, or by Material or Mass Balance, if supporting documentation is submitted;
 - g) EPA-published emission factors, where available; some of these will be provided automatically in EMIT from WebFire.
 - h) Emissions factors from other industry and trade groups based on sound science. These should be discussed with Technical Services prior to use.
- 3) A new Emission Factor Origin value has been introduced into EMIT. It is No Default EPA Factor. We have set the Emission Factor Origin value to No Default EPA Factor, when there is no ***EPA Emission Factor*** and no other Emission Factor Origin has been provided for the Source/Source Classification Code (SCC)/Pollutant. If the pollutant is emitted from your source/SCC then you must quantify these emissions. To do this, on the Emission Information tab in EMIT, change the Emission Factor Origin to an appropriate value. If the Emission Factor Origin is changed to "CEMS – Continuous Emission

Monitoring System” or “Tank Model” then EMIT will allow you to enter in the emissions directly. For all other Emission Factor Origin values, you must provide an emission factor and EMIT will calculate the emissions once the data is saved.

- 4) The SO₂ Emission Factor Origin has been changed for roughly a dozen fuel burning sources from CEMS to the EPA Default Factor. These sources were incorrectly reporting their SO₂ emissions as being based on CEMS when they are in fact emission estimates based upon fuel usage and an assumed percent sulfur content. The SO₂ emissions for these sources should be based upon the EPA default formula, which incorporates the percent sulfur content of the fuel. If you believe that your SO₂ Emission Factor Origin should have been left at CEMS, please call Technical Services.
- 5) Since PM_{2.5} is a subset of PM₁₀, PM₁₀ emissions cannot be less than PM_{2.5} emissions. There are some SCCs where the EPA default emission factor for PM_{2.5} exists but the PM₁₀ emission factor does not. If no reliable PM₁₀ primary emission factor exists, then use a PM₁₀ primary emission factor that results in the PM₁₀ primary emissions being equal to the PM_{2.5} primary emissions.
- 6) When reporting HAPS please double check to ensure that you have properly accounted for reductions from control equipment. For example, if you have VOC controls and your process also emits VOC HAPS, then please review to see if the control efficiency should also be applied to the VOC HAP pollutant for estimating your VOC HAP emissions.
- 7) Remember to report your control equipment even if you cannot quantify its control efficiency or the control efficiency is not used in the emission calculations. For example units with low NO_x burners should identify this control device on the Source to Stack tab and Control Banks tab even though the percent control efficiency may not be known, or the control efficiency is not used in the emission calculation because the emissions are based on CEM or an after control emission factor. Control equipment descriptions that start with “zExpired-“ should not be used. Please contact DEEP before making changes to control equipment assignments.
- 8) Please contact DEEP before you change an existing SCC assigned to one of your sources.

Information to assist in understanding and navigating the DEEP ezFile, as it applies to EMIT, follows:

EMIT is now accessed through the DEEP ezFile Portal (<https://filings.deep.ct.gov/DEEPPortal/Account/>) via the Google Chrome browser. This change allowed EMIT to be moved off an antiquated operating system to a more modern operating system that was described as providing many benefits. The use of the DEEP ezFile Portal provides new user self-management capabilities that should help reporters and a single account to access multiple EMIT accounts for users holding multiple EMIT accounts.

The DEEP ezFile Portal includes a user self-management interface that gives users the ability to create their account, find their account name, reset their passwords and change their challenge questions. The ezFile user help document (https://selfserve.deep.ct.gov/SelfService/UserHelp/User_Help_v3.0.0.4.pdf) describes these capabilities and other useful user self-management capabilities and provides links to assist in performing the desired action. You the user create and manage the DEEP ezFile account. A DEEP ezFile account that is being used for EMIT reporting needs to be exclusively controlled by the user that signed the subscriber agreement to ensure that the DEEP ezFile portal authentication remains consistent with the subscriber agreement. The DEEP ezFile portal only serves to authenticate a user and no access to EMIT with an ezFile account will be possible without the DEEP ezFile account being mapped to an EMIT account that defines security and accessibility within EMIT.

The EMIT user account is created by DEEP EMIT administrators based on the applicable subscriber agreement(s). The EMIT account(s) function the same way that they did in the past, except authentication (i.e. verifying the user is the owner of an account via password and or challenge questions) is provided via

DEEP ezFile using the DEEP ezFile that is mapped to the EMIT account. Mapping the EMIT account to the DEEP ezFile account is performed by DEEP EMIT administrators, who need to know information needed to map the accounts like the DEEP ezFile user name and email address for a particular EMIT user. EMIT users that have not provided DEEP ezFile information needed to provide this mapping will not have access to their EMIT account, until they provide DEEP ezFile account information to align their EMIT account to their DEEP ezFile account. The DEEP ezFile account must be created and managed by the user as DEEP cannot account for you. The EMIT account and the mapping of the EMIT to the ezFile account are controlled and managed by DEEP.

Internet Explorer does not work properly with EMIT and Microsoft Edge does not provide needed support for PDF documents. Other browsers were not tested. Testing and limited user experience has revealed that even Google Chrome does not work perfectly and there may be occasion where a user may needed to log out then log back in on first use or after a significant change to EMIT.

2018 EMIT reporting will be using a Phase I solution implementation of this DEEP ezFile authentication. The notification of external users on submission of an emissions statement or compliance report as well as the acceptance of an emissions statement after emission statement submittal was lost in this Phase I release. We regret that these features could not be included in the Phase I release. Users wanting to check to see if a report was submitted will need to use the dated report filings under the Documents tab for the specific report type (Emission Statement, Title V Compliance Certification, GPLPE Annual Compliance Certification, etc.), to determine if a report was filed or recently amended.

This Phase I solution implementation was tested and there are known issues that do not impact the ability to report. One issue is that extra records appear on a landing page when a client change happened in a year that a user has access rights.