| From: | E&E Email List <emaillists@adeq.state.ar.us></emaillists@adeq.state.ar.us> |
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| Sent: | Tuesday, March 29, 2022 4:00 PM |
| То: | emissioninventory-emaillist |
| Subject: | [Air Policy and Planning Branch] 2021 Emission Inventory Information |
| Attachments: | 2021 Emission Inventory Letter.pdf; 2021 Emission Inventory Important Notes.pdf; |
| | Emission Inventory Flowchart.pdf; image002.png |

Type A Emission Inventory Permitted facility representatives,

The 2021 Emission Inventory report submission process started January 1, 2022 and the Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) has sent a courtesy letter to all Type A reporting facilities with correct mailing address information on file. The courtesy letters will contain information regarding the 2021 emission inventory. Please review the most recent SLEIS application for your facility to make sure that no changes need to be made regarding personnel roles in the SLEIS system. If changes are necessary, please complete a new SLEIS application form (available via the DEQ SLEIS website) and submit it to DEQ (e-mail submission to emissioninventory@adeq.state.ar.us is acceptable) by April 30, 2022. Please remember that any users currently listed for the facility will be deactivated if they are not included on the revised application. Also note that facilities should contact DEQ (and submit an updated SLEIS application) if there are facility contact information changes at any time during the reporting process as this will ensure that the DEQ Emission Inventory team can always contact the correct

facility representative(s) if needed. Facilities must complete data entry in SLEIS and notify DEQ that data entry is complete by the data entry deadline of June 30, 2022. This notification of complete data entry is made by marking the report as "Ready to Submit" in SLEIS (this box becomes an available option once an Editor validates the report and no errors are found). A preliminary review will then be completed by a DEQ Emission Inventory team member. In addition to the courtesy letters, there are also additional resources available via the SLEIS and DEQ websites (please note the items in the "News" section of the <u>DEQ SLEIS homepage</u>). The most recent version of the Emission Inventory Flowchart is attached for your convenience and serves as a guide to the complete emission inventory reporting process. A document entitled "2021 Emission Inventory Important Notes" is also attached for reference and includes additional information regarding the 2021 Emission Inventory. As always, the DEQ Emissions Inventory team is available to assist facility representatives with any questions regarding the inventory. Facility specific reporting questions are often best handled on an individual basis due to the complex nature of some issues encountered. Please feel free to contact a DEQ Emission Inventory team member if you have specific questions or need assistance during completion of the 2021 Emission inventory assistance in preparing the most complete and accurate emission inventory possible for the 2021 reporting year. Thank you,

Steve Tune | Emission Inventory CoordinatorDivision of Environmental Quality | Office of Air Quality5301 Northshore Drive | North Little Rock, AR 72118t: 501.682.0537 | e: tune@adeq.state.ar.us

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March 28, 2022

Dear Environmental Manager,

The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) herby notifies you that your facility is required to submit a 2021 Emissions Inventory (EI) report to DEQ for your facility pursuant to the Air Emissions Reporting Requirements, Part 51, Appendix A to Subpart A, Table 1 and Arkansas Pollution Control and Ecology Commissions (APC&EC) Rule 19.705. This data will be forwarded to the United States Environmental Protection Agency (EPA) in accordance with requirements under 40 CFR Part 51, Subpart A for inclusion in the National Emissions Inventory (NEI), which is used to support air quality modeling and planning.

The State and Local Emissions Inventory System (SLEIS) is the web-based emissions inventory reporting system that DEQ uses to collect required EI reports. SLEIS can be accessed at <u>https://sleis.adeq.state.ar.us/.</u> There are three types of user roles in SLEIS:

- Viewer: Users assigned this role have read-only access to the facility information;
- Editor: Users assigned this role can make changes to facility information; and
- Submitter: The user assigned this role can submit the EI report to DEQ. The submitter role may only be assigned to one user per facility. The user assigned the submitter role must be an owner, operator, or employee of the facility and must be a "Responsible Official" as defined in APC&EC Rule 19, Chapter 2.

Prior to data entry, the facility user(s) should verify that the report structure in SLEIS accurately reflects permitted emission units, controls, and processes in accordance with the permit(s) that were active during the reporting period. The "Responsible Official" assigned the **submitter** role should review the report for accuracy and completeness prior to submittal.

The deadline to submit the 2021 EI report, including all report changes, data entry, and required attachments, is June 30, 2022. Extensions may be granted for special circumstances only if a request is made in writing to the mailing address below or <u>emissioninventory@adeq.state.ar.us</u> (Attn: Steve Tune) prior to the May 15, 2022 due date and approval is granted by DEQ.

Attn: Steve Tune Division of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

Various SLEIS training resources are available via the SLEIS and DEQ websites. Additional training and assistance will be available upon request from each facility as needed throughout the submission period.

REQUIRED FORMS FOR SLEIS USERS:

All required forms are located on the DEQ SLEIS website at https://sleis.adeq.state.ar.us/.

User Application

A SLEIS Application Form is required for new SLEIS users. The "Responsible Official" to be assigned the **submitter** role should be listed as the primary user on the application for a SLEIS account. **The deadline to submit user applications is April 30, 2022.**

<u>Electronic Signature Agreement</u>

Due to EPA security requirements, an Electronic Signature Agreement signed by the "Responsible Official" to be assigned the "Submitter" role must be provided to the DEQ Emission Inventory team for identity verification prior to EI report submission. A hard-copy of the signed Electronic Signature Agreement must be mailed to:

Electronic Signature Agreement Committee Division of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

Do not include any other documents in the envelope with the signed Electronic Signature Agreement. The deadline to submit an Electronic Signature Agreement is April 30, 2022.

If you have previously submitted an Electronic Signature Agreement to the Emissions Inventory team at DEQ and the "Responsible Official" assigned the "Submitter" role has not changed, you do not need to submit a new Electronic Signature Agreement.

<u>Arkansas Point Source Inventory Facility General Information Form</u>

The Arkansas Point Source Inventory Facility General Information form must be signed and attached to the SLEIS Report for your facility or the report will be considered incomplete.

CONFIDENTIALITY:

EI reports are typically not subject to protection as confidential documents according to Arkansas law. However, if a facility wishes to claim any part of the EI report as being subject to protection as confidential, that facility must submit both a confidential copy and a redacted copy of the report along with an affidavit per DEQ policy (see APC&EC Rule 19.413 for instructions concerning these submittals).

If you have any questions about SLEIS or the Emission Inventory, please contact Steve Tune at 501-682-0537 or <u>emissioninventory@adeq.state.ar.us</u>.

Sincerely,

Bailey Tayloz

Bailey Taylor E&E Associate Environment Administrator Interim Associate Director, Office of Air Quality





2021 EMISSION INVENTORY IMPORTANT NOTES

New information for the 2021 inventory:

Facilities should submit all applicable administrative forms (updated SLEIS application forms, Electronic Signature Agreements, etc.) to the Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) by April 30, 2021.

Email address for the DEQ Emission Inventory:

SLEIS application submissions and other Emission Inventory-related business can now be sent to <u>emissioninventory@adeq.state.ar.us</u>. Please add this new email address to your contact information.

The "SLEIS Editor's Guide" is available on the DEQ SLEIS homepage at <u>https://sleis.adeq.state.ar.us/</u> (under the "News" section on the right side of the page):

The DEQ SLEIS Editor's Guide is a step-by-step instruction manual that outlines operations in the SLEIS software (such as creating different items in the report and completing the report).

The Emission Inventory Flowchart is available on the DEQ SLEIS homepage:

A flowchart is available to assist facility representatives completing emission inventory reports. The chart guides users through all of the steps that must be completed in the reporting process. Useful links to necessary forms may also be found in the flowchart. The flowchart is available via the following link: <u>http://www.adeq.state.ar.us/air/planning/pdfs/emission_inventory_flowchart.pdf.</u>

Facilities that are new to submitting or that did not report in recent years can reference previous Emission Inventory Important Notes documents:

Emission Inventory Important Notes documents for 2016, 2017, 2018, 2019, and 2020 are available on the DEQ SLEIS homepage at <u>https://sleis.adeq.state.ar.us/</u> (under the "News" section on the right side).

IMPORTANT THINGS TO REMEMBER

All permits active during the reporting period should be used to guide data entry:

DEQ Emission Inventory QA/QC procedures are based on review of all permits that were active during the entire reporting period of January 1, 2021, through December 31, 2021.

Permits and permit activity dates can be found at <u>https://www.adeq.state.ar.us/home/pdssql/pds.aspx</u>.

Control measure data must be entered into SLEIS:

All control measures and associated data must be entered into the SLEIS report although Post-Control emissions are the focus of the inventory. EPA requires the reporting of control measures and their associated efficiencies to the National Emissions Inventory (NEI).

PM filterable and condensable should be reported if available:

If a facility's permit notes a limit for any size of particulate matter (PM), both filterable (FIL) and condensable (CON) forms of the specified PM should be reported if that information is available. In addition to any filterable and condensable PM data, the primary (PRI) measurement for the class or classes of PM specified in the permit <u>must always be reported</u> and should equal the sum of the filterable and condensable PM components. **Please report the PRI <u>AND</u> the FIL/CON measurements for each PM class (PM, PM10, PM2.5) specified in the permit (if FIL/CON information is available).** If a smaller class of PM is reported, emissions for all larger classes should be reported and must be equal to or greater than the smaller classes of PM reported. Example: If a permit lists an emissions limit for PM10, emissions should be reported for PM10-PRI (in addition to PM10-FIL and PM-CON if they are available) and PM-PRI with PM-PRI emissions being equal to or greater than the PM10-PRI emissions being equal to no greater than the DEQ SLEIS website under the "News" section.

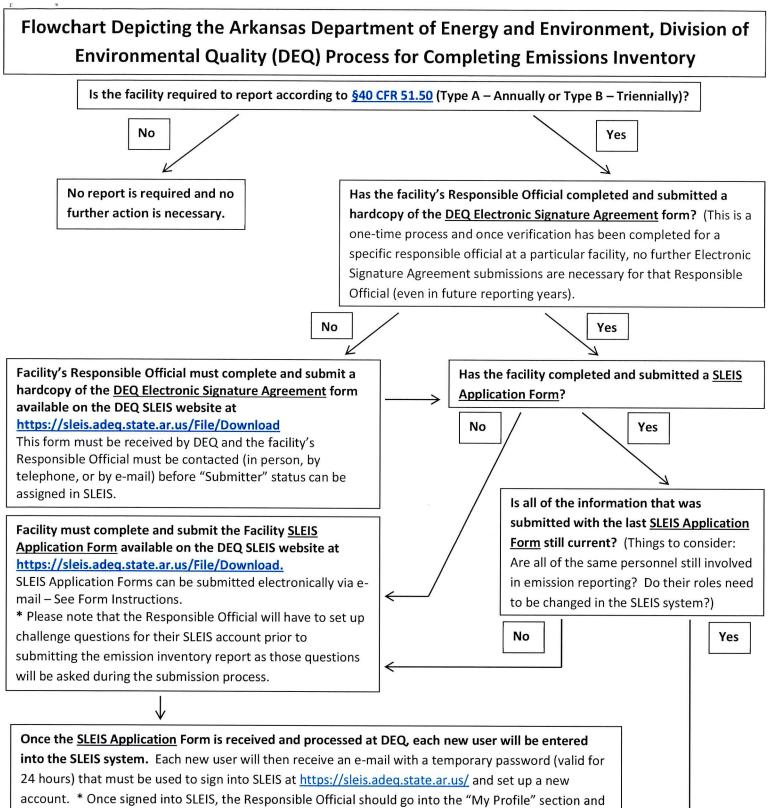
Hazardous air pollutants (HAPs) must be speciated if they are speciated in the facility's permit:

See the following scenarios for clarification:

- 1. If HAPs are individually speciated in a facility's permit, emissions for each HAP must be reported individually in SLEIS: HAPs that are listed individually in the permit should not be totaled and reported as one figure.
- 2. If HAPs are totaled in a facility's permit (ex. emissions limit is only listed for "Total HAPs" and individual HAP pollutants are not listed), then the total HAP emissions should be reported using SLEIS pollutant code THAP (Total HAPS).
- 3. If a facility's permit notes a limit for the category "Single HAP" in a particular process, the highest emissions for any single HAP within that process should be reported in SLEIS using pollutant code HAP (SPC) HAZARDOUS AIR POLLUTANTS.
- 4. If a facility's permit notes a limit for both individually speciated HAPs and a limit is given for Total HAPs in the same process, emissions for each individual HAP and a Total HAPs calculation should be reported for that process. This will not result in double counting. Instead it gives reviewers and end users of the inventory data an option of which calculation(s) to use when calculating HAPs for that particular process
- 5. In a case where there are multiple permits active during the reporting year and one of the permits lists limits for individual HAPs in a specific process while another permit lists a limit for "Total HAPs" for that same process, emissions for both speciated HAPs and Total HAPs should be reported for the process.

Please contact the DEQ Emission Inventory Team with any questions.

Steve Tune: 501.682.0537, <u>tune@adeq.state.ar.us</u> Jaret Byrd: 501.682.0627, <u>jaret.byrd@adeq.state.ar.us</u> Scot Stinson: 501.682.0538, <u>stinson@adeq.state.ar.us</u>



set up their Challenge questions that will need to be answered during the submittal process.

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Flowchart Depicting the DEQ Process for Completing Emissions Inventory (Page 2)

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Yes

Once a user account has been set up and a report has been created by DEQ in the SLEIS system, the report will be available to enter data. If the facility has reported emissions through SLEIS before, the report will already be populated with some information based on previous reporting. Users with "Editor" roles assigned to them will then enter the facility's emission data into SLEIS. Please be as accurate and detailed as possible. Please see the "Training Videos" and "Helpful Hints" documents available on the DEQ SLEIS homepage at https://sleis.adeq.state.ar.us/ for further assistance, and also remember that you can always contact the DEQ Emission Inventory team with any questions you may have.

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Once data entry is complete, a user with an "Editor" role will validate the report to make sure that no errors have occurred. This is done using the "Validate Report" button in SLEIS.

Has the Responsible Official completed the <u>Arkansas Point Source Inventory Facility General Information Form</u> and attached it to the SLEIS Emission Inventory Report using the "Report Attachments" tab? Please make sure that all contact information is updated and consistent with what has been entered into SLEIS as well as all other inventory-related forms (previously submitted SLEIS applications and Electronic Signature Agreement forms, etc.)

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No

Responsible Official must complete and submit the <u>Arkansas Point Source Inventory Facility</u> <u>General Information Form</u> available on the DEQ SLEIS website at <u>https://sleis.adeq.state.ar.us/File/Download</u> and electronically attach the completed form to the SLEIS Emission Inventory Report using the "Report Attachments" tab. (Responsible Official should review the report prior to electronically signing and attaching this form to the report)

Once all editing of the report has been completed, facilities must notify DEQ by marking the report as "**Ready to Submit**" in SLEIS. This notification must be completed **prior to the data entry deadline (due date)** and **before** final submittal so that a preliminary review can be completed by an DEQ Emission Inventory team member. Once DEQ review is complete and any issues found in the report have been addressed, the Responsible Official will be given a "Submitter" role in SLEIS and will be contacted via e-mail to advise them that the report is ready for their submittal.

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Responsible Official with "Submitter" role will <u>submit the report</u>. This is done using the "Initiate Submission" button in SLEIS. Once the **Initiate Submission** button is selected, the user will be submitted with a **View Electronic Document** button that must be selected (for review of the document). Once that step has been completed, the user will be asked to agree to various conditions (Submission Agreements). The next step in the process is to submit the electronic signature by correctly answering a selected Challenge Question from the user's profile and reentering the user's password. The user is then presented with a "**View official copy of record**" button to view the report and a unique confirmation number. Once the **Done** button is selected the status of the report will be changed to "Submitted" and the user will no longer be able to edit the report.