



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

2/1/2017

**Re: Requirement to Submit Emissions Reports for 2016
by April 17, 2017 for:**

Helpful Links

eBusiness Center

ebiz.epa.ohio.gov

Ohio EPA Customer Support Center FAQs

ohioepa.custhelp.com

Search keywords to find answers and tutorials on emissions reporting and Air Services!

Air Services Web Page

epa.ohio.gov/dapc/airservices.aspx

Emissions Reporting Info

epa.ohio.gov/dapc/es.aspx

Dear PRIMARY CONTACT:

April 17, 2017, is the deadline for all owners/operators of Synthetic Minor Title V facilities to submit their calendar year 2016 Fee Emissions Report (FER), Emissions Inventory Summary (EIS) and Emissions Statement (ES) reports. The FER, EIS, and ES must be submitted via the eBusiness Center: Air Services. The information in this letter is designed to help you:

- **Know the regulatory basis for emissions reporting requirements.**
- **Submit reports successfully by the Authorized Representative.**
- **Be aware of software changes for 2016 reporting year.**
- **Need assistance? We can help!**

Know the regulatory basis for the emissions reporting requirements

Failure to submit these emissions reports by the April 17, 2017, deadline is considered a violation of Ohio EPA rules and may result in enforcement action being taken against the facility.

Fee Emissions Report - Your company has been identified as owning or operating a facility subject to the Synthetic Minor Title V emissions reporting requirements of Ohio Administrative Code (OAC) 3745-78-02(F) for calendar year 2016. "Synthetic Minor Title V" (SMTV) facility means a facility for which one or more permits have been issued for the air contaminant sources at the facility that include terms and conditions that lower the facility's potential to emit air contaminants below the major source thresholds established in rules adopted under Section 3704.036 of the Ohio Revised Code. It is a requirement of your permits and Ohio law to submit these reports annually. Once filed, the reports undergo review by the appropriate District Office or Local Air Agency. Data from these reports is used to assess a fee on the actual amount of emissions of particulate matter, sulfur dioxide, nitrogen oxides, organic compounds and lead. More information and the fee schedule for 2016 is available on the emissions reporting information page given. An invoice will be sent in July to the billing contact you specify.

Emissions Inventory Summary - Ohio EPA is required by U.S. EPA to report annual criteria and toxic pollutants. This combined report eliminates the need for duplicative reporting for the air program. All Title V and Synthetic Minor Title V facilities are required to file a complete EIS annually.

Emissions Statement - The county the facility is located in was designated as nonattainment for the 8-hour ozone National Ambient Air Quality Standard in 2016. Pursuant to OAC Chapter 3745-24 and the Clean Air Act section 182(a)(3)(B), facilities located in ozone nonattainment counties are subject to the requirement if the actual emissions of the facility are greater than or equal to 25 tons per year of volatile organic compounds (VOC) or NO_x during the reporting year. In general, facilities subject to this requirement must submit actual emissions for NO_x and VOC.

Submit reports successfully by the Authorized Representative

The Authorized Representative, (see Ohio Revised Code 3745.11.1,) must sign off on these submissions. Signature can be accomplished by actually entering his/her PIN during the submit process or by signing an attestation form that is uploaded during the submit process. If the latter option is chosen, the person performing the submit process and entering his/her PIN must be an employee of the company; consultants should not submit.

Be aware of software changes for 2016 reporting year

There are two issues that you may encounter when completing this report.

1. Source Classification Code (SCC) Changes: The U.S. EPA made hundreds of new SCCs available and deactivated many existing SCCs. The deactivated SCCs were used by many Ohio facilities. If your facility is one of them, you will want to follow the specific instructions we have made available to select a new valid SCC when preparing your report. We recommend you review the list of affected facilities and the instructions prior to preparing the report in Air Services. See the "Need Assistance?" section below.
2. Controlled Pollutant Information Required: For the 2015 reporting year there were new data validation "warnings" for pollutant data associated with air pollution control equipment. Those warnings are now errors and will prevent the report from being submitted if the information is not provided. To date, Ohio EPA has not sent control equipment data as a part of our emissions inventory to U.S. EPA. That data is required by federal rule. The data we have required from facilities for control equipment in past years doesn't meet the minimum requirements of the National Emissions Inventory (NEI) and won't pass that data validation. In many cases we have data showing control equipment is present, but the pollutant controlled, capture efficiency, and operating control efficiency are needed. This software change is needed to come into compliance with the new federal EIS standard.

Need assistance? We can help!

- **Customer Support Center FAQ** on Ohio EPAs web page. To view this, visit the page <http://ohioepa.custhelp.com> and search "2016 Emissions Report". You will find:
 - New complete list of SCCs;
 - List of facilities using deactivated SCCs;
 - Instructions on best practices for changing an SCC in Air Services;
 - Dates and times for upcoming Webinars;
 - Links to training videos;
 - Can't find an answer, post a new question and get a quick response!
- **Context Specific Help** - click the word "Help" in the top right corner of any Air Services screen.

eBusiness Center account or PIN	eBusiness Center Helpdesk, 1-877-EPA-BIZZ
Air Services Access	Linda Lazich, (614) 644-3626 or linda.lazich@epa.ohio.gov
Emissions Reporting	Safaa El-Oraby (614) 644-3571 or safaa.eloraby@epa.ohio.gov

Please contact us with any questions you may have.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC