Transition to the Combined Air Emissions Reporting System (CAERS)

NACAA 2023 Spring Meeting May 9, 2023





Transition to CAERS



- Annual Point Source El Reporting
- E-enterprise for the Environment
- CAERS Overview
- El Reporting Improvements
- Onboarding Timelines
- ADEQ CAER Pilot
- Resources and Contact Information

Annual point source El reporting



Calendar year ends

- Facilities compile data depicting emissive activity
- •State/local agencies release updated El reporting forms and training resources

Data sharing/use

- •State/local agency shares some reports (after obfuscating confidential portions) with U.S. EPA per AERR. EPA compiles data into the National EI which is widely used in regulatory and other research
- •State/local agency may use reports to directly inform regulatory decisions or to bill certain facilities
- Public may request reports or summaries

Report preparation

- Facilities describe equipment or operational changes if applicable
- Facilities estimate emissions, potentially of many pollutants from many activities
- May require substantial research to develop accurate emissions estimates
- •State/local agencies may train or assist
- May employ private consultants

Quality assurance

- State/local agency recommends revisions to correct errors, fill gaps, depict facility or emissions more realistically, clarify estimation methods, etc. in each report.
- Edits may be made by either facility or state/local agency, but must be approved by the responsible official.

Report submission

- •Typically due between March and June
- •Authorized responsible official for facility must certify the accuracy of the report
- Facility must securely transmit certified forms to state/local agency

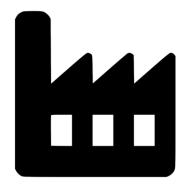
Mandatory, recurring air emissions reporting



Compliance & Emissions Data (CEDRI), Greenhouse Gas emissions (GHGRP), Toxics Release Inventory (TRI),

etc.





Air Emissions Reporting Requirements (AERR)

Annual Point Source El Reporting Programs



E-Enterprise CAER Team Background



The Combined Air Emissions
 Reporting Team (CAER) is part
 of the E-Enterprise for the
 Environment Initiative.



Modernizing the business of environmental protection

- E-Enterprise for the Environment
 - supports a collaborative approach among co-regulators
 - to provide opportunities for early engagement with EPA
 - in order to deliver environmental programs and services with greater efficiency and effectiveness by streamlining and simplifying processes.

E-Enterprise CAER Product Design Team (PDT)



- The CAER project seeks to streamline the way industry reports air emissions to meet EPA, state, local, tribal, and territorial program requirements.
- Current PDT SLTT membership: AZ, Pima AZ, DC, GA, FL, LA, ME, MI, MN, MS, MT, NC, OK, OR, RI, SC, TN, TX, WI, WY.

- The CAER PDT is responsible for:
 - prioritizing CAER implementation work and research,
 - setting up Research and Development (R&D) teams, and
 - integrating work outcomes into future research and the CAER system.
- CAER PDT Members impact the focus of the team and the resulting CAER system.

Combined Air Emissions Reporting System



What is CAERS?

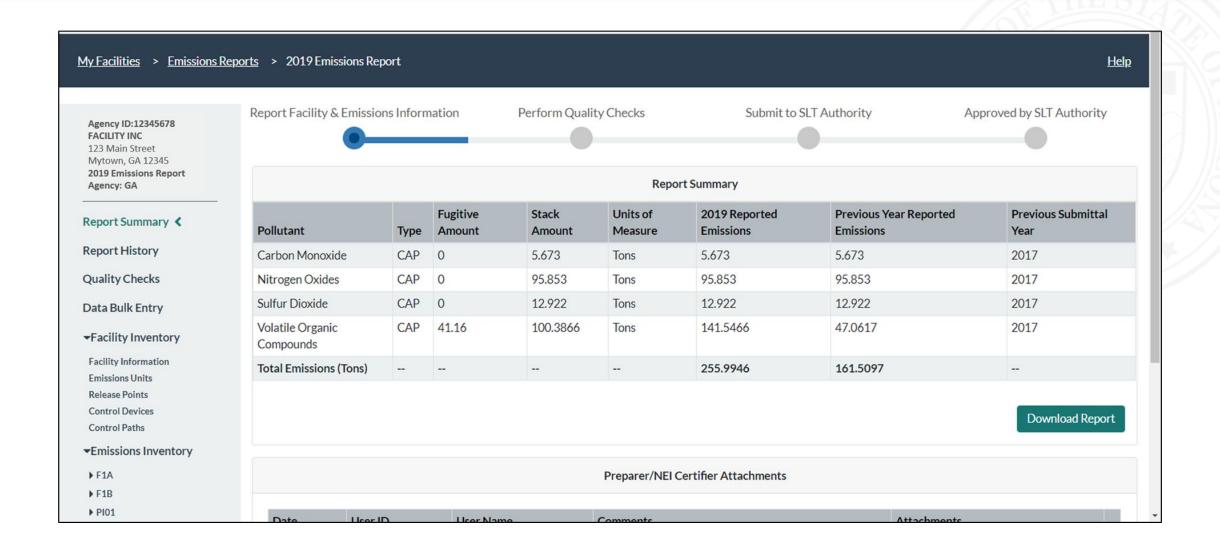
Combined Air Emissions Reporting System (CAERS): an application that allows industry from subscribed State, Local, or Tribal authorities (or SLTs) to report their air emissions so you can:

- Meet SLT-specific air emissions reporting requirements
- Report annually or triennially to Air Emissions Reporting Rule (AERR per 40 Code of Federal Regulations or CFR, Part 51) via your SLT.
- Optionally, get a head start on Toxics Release Inventory (TRI) air toxics emissions (per 40 CFR, Part 372), to be finished in TRI-MEweb

You should check with your SLT to determine if you meet the criteria.

Combined Air Emissions Reporting System





Combined Air Emissions Reporting System



Web-based reporting application

• Current users: GA, DC, RI, ME, ID, and Pima County, AZ.

• Future users: MT, AZ, MS, others?

- Eventually facilities will report shared data, via a single data submission, to the
 - National Emissions Inventory (NEI),
 - Toxics Release Inventory (TRI),
 - Compliance & Emissions Data Reporting Interface (CEDRI), and
 - Greenhouse Gas Reporting Program (GHGRP).

^{*}E-Enterprise Bulletin, Vol. 1 No. 15; September 1, 2022. See https://mailchi.mp/ecos.org/z8kmzmq2kc-13669476

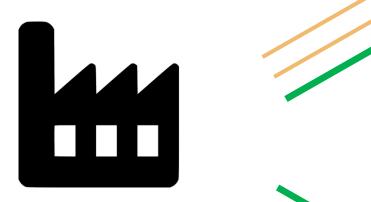
Dataflow consolidation



Compliance & Emissions Data (CEDRI), Greenhouse Gas emissions (GHGRP), Toxics Release Inventory (TRI),

etc.





Air Emissions Reporting Requirements (AERR)

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Quality of life improvements



Permitted Facilities

- Common emission factor (EF) research need not be repeated
- Simple year-over-year updates
- Specific, instructive, real-time feedback
- Retired object cleanup
- Expanded functionality of bulk upload template

Government Agencies

- Emissions inventory data quality assurance and quality checks (QA/QC) built into CAERS.
- Reduced redundancy in reporting air emissions data.
- Shorten review time required for data quality assurance and reconciliation.
- Reduce staff time and agency funds spent on IT related needs such as
 - customer support,
 - database hosting and updating, and
 - identity proofing.

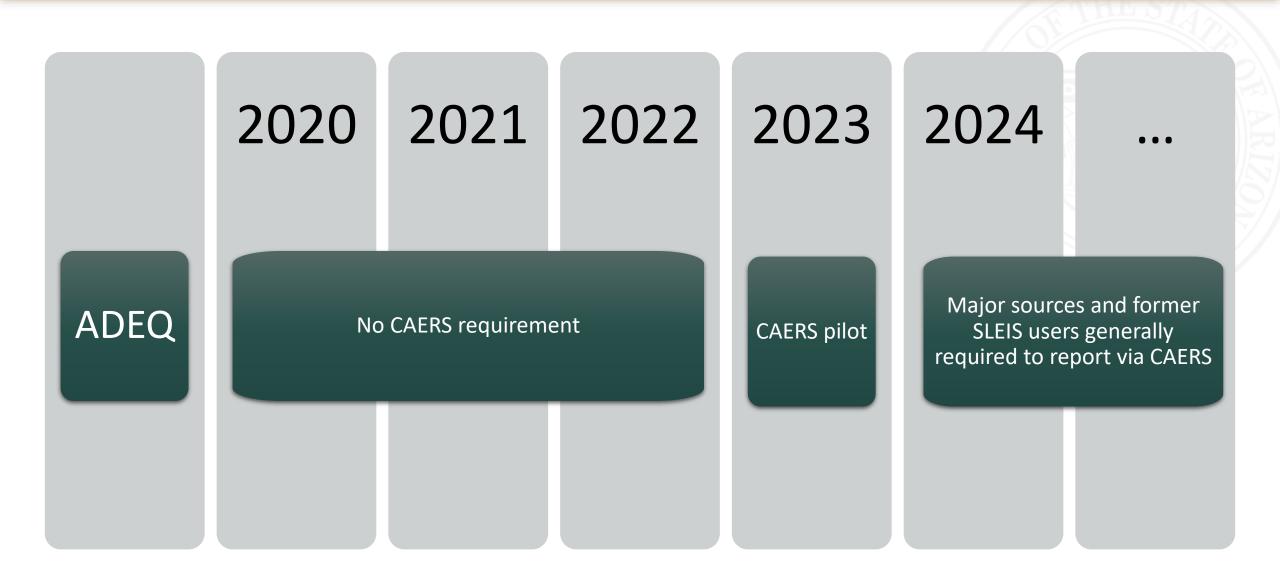
Data quality improvement opportunities



- Up-to-date Emissions Inventory System (EIS) data validations
- Improved calculation transparency and comparability
- Custom validation checks and QA/QC best practices shared between states and localities

ADEQ Onboarding timelines





ADEQ 2023 pilot



- Voluntary participation; others continue using prior reporting methods
- Most participants will start from a basis of last year's SLEIS report
- Participants were able to experiment in a sandbox environment to identify major concerns and see if they wish to proceed
- Live reporting began in March 2023.
 - Attendance of workshops and 1-on-1s was encouraged
- Goals of pilot (similar to beta testing):
 - Test out options for controls, fuel, and shutdowns
 - Working out serious kinks before 2024
 - Identifying remaining process shortcomings
 - Prioritizing fixes and workarounds
 - Brainstorming future improvements/features



ADEQ 2024+



• If the pilot goes well, current SLEIS users and current/future Class I permit holders (other than air curtains) must use CAERS when operating

- Account creation and setup for 50+ facilities will be time consuming
 - ADEQ will likely begin working with some facilities in late 2023 to get a head start
 - Enrollment for some highly complex facilities may be delayed until 2025 if needed
 - CAERS may subsequently be opened up to additional Class II permit holders (especially synthetic minors other than general permits) at ADEQ's discretion
- Facilities that want ADEQ to hold some of the records in their report as confidential (rather than public) will need to submit an all-public version via CAERS and a more detailed confidential version separately, via email

Resources





epa.gov/combined-air-emissions-reporting/
combined-air-emissions-reporting-system-caers



azdeq.gov/emissions-inventories



http://e-enterprisefortheenvironment.net/ourprojects/combined-air-emissions-reporting-caer/

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Contact Information



ADEQ Contacts

- Kelly Poole
- Adam Ross and Hilary Moore <u>EmissionInventory@azdeq.gov</u>

Thank you!

CAER Project Key Contacts

- Julia Gamas of EPA,
- Tammy Manning of the North Carolina Department of Environmental Quality, or
- <u>Stacy Knapp</u> of the Maine Department of Environmental Protection.

General Information for States:

 Kurt Rakouskas of the Environmental Council of the States (ECOS)