

# Annual Operating Report (AOR) Frequently Asked Questions

## December 29, 2011

### I. AOR Submittal Deadline

**1. What is the 2011 AOR deadline?**

The 2011 AOR due date is April 1, 2012. If you are submitting using a hardcopy, the postmark date must be no later than April 1, 2012. If you are submitting electronically, the submission should be received by DEP by April 1, 2012.

**2. Why isn't the Title V fee due date the same as the AOR deadline?**

While there is some overlap between the two reports regarding actual operating conditions (e.g. documented hours of operation, documented fuel usage, etc.), the Title V fees are based on permitted allowable emission rates, while the AOR calculations are based on actual emission rates. Therefore, it is best to calculate the annual emissions fees first to avoid the possible error of paying fees based on actual emissions and ending up with a balance due notice that includes penalties for underpayment.

### II. Reportable Pollutants

**3. Do I still need to report PM, or just PM<sub>10</sub>, PM<sub>2.5</sub>, and CPM?**

You do not need to report PM, provided you do not have a PM emission limiting standard in your permit.

**4. What if I don't know my condensable particulate matter (CPM) emissions?**

CPM emissions must be reported if the emissions unit is subject to a numerical emission limit for CPM. Otherwise, CPM should be reported if information is available to estimate emissions, and such emissions are equal to or greater than 5.0 tons per year per SCC. Do not add the pollutant CPM in EAOR if you do not have emissions data to report.

**5. When using AP-42 or the EPA FIRE system, how do I report PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions using the primary, filterable, and condensable emission factors?**

Depending on the SCC and control equipment configuration, you may find emission factors for primary PM, primary PM<sub>10</sub>, primary PM<sub>2.5</sub>, filterable PM, filterable PM<sub>10</sub>, filterable PM<sub>2.5</sub> and condensable PM. In general, the emission factors listed as primary include both the filterable and condensable components. All condensable PM is in the PM<sub>2.5</sub> size fraction. Report emissions as follows:

- If you find an emission factor for condensable PM, report that as CPM on your AOR. Then report only the filterable part for PM, PM<sub>10</sub> and PM<sub>2.5</sub> respectively.
- If the emission factor for condensable PM does not exist, then use the emission factor for filterable PM. Same principle applies for PM<sub>10</sub> and PM<sub>2.5</sub>.
- You should never add the emission factors for primary and filterable since primary already includes the filterable.

**6. Should TBAC (t-butyl acetate) be included in my VOC emissions?**

TBAC emissions should not be included in VOC emissions, but must be reported separately on an annual basis, if TBAC emissions exceed the reporting threshold (5 tons per year per SCC).

### III. Reporting Hazardous Air Pollutant (HAP) Emissions

**7. Which HAP emissions should I report on my AOR?**

- If your facility has a numerical emission limit for a specific HAP, then you must report that HAP, regardless of the quantity. If the permit contains a numerical emission limit for "any" HAP, without specifying a particular HAP, then you must report, for each SCC, each HAP with emissions equal to or greater than 1000 pounds per year at that SCC.

- If your facility emits or has the potential to emit 25 tons per year or more of combined (total) HAPs, then for each SCC, report each individual HAP that is emitted at an actual level of 1000 pounds per year or more at that SCC.
- If your facility emit or has the potential to emit 10 tons per year or more of one or more individual HAPs, then for each SCC, report each such HAP that is emitted at an actual level of 1000 pounds per year or more at that SCC.

**8. Do I need to report HAPs if my facility is not a major source for HAPs?**

Yes, if the HAPs are subject to numerical emission limits as set forth above. Facilities are encouraged to report any available HAPs data on a voluntary basis, even if it is not required.

**9. How often must I report HAPs?**

If your facility has a numerical emission limit for a given HAP, or for “any” HAP without specifying a particular HAP, you must report annually. Otherwise, you should report HAPs every three years starting with the report for calendar year 2008 and continuing with the reports for calendar years 2011, 2014, etc.

**NOTE:** While reporting of HAPs is required only every three years, DEP encourages facilities to report HAPs every year if data are available.

## IV. Emissions Method Codes

**10. What are the emissions method codes?**

The Emissions Method Codes are:

- 1A: CEMS – This entry indicates that the emissions were determined based on emissions measurement using a continuous emissions monitoring system (CEMS).
- 2: Material balance – This entry indicates that the emissions were calculated by the use of materials balance and knowledge of the process.
- 3A: Emissions factor – This entry indicates that the emissions were calculated using an emission factor based on site-specific data such as stack test data.
- 3B: Emissions factor – This entry indicates that the emissions were calculated using a directly applicable emission factor from AP-42, the EPA FIRE system or other published emissions calculation source.
- 4: Emissions factor – This entry indicates that the emissions were determined based on a similar, but different, process in AP-42, the FIRE system or other published emissions calculation source. Code 4 should only be used when no directly applicable emission factor is included in these documents.
- 5: Emissions factor – This entry indicates that the emissions were calculated using an emission factor other than one listed above.

**NOTE:** There is no 1B emissions method code. The previous emissions method codes 1 and 3 have been retired. They have been replaced with 1A, 3A and 3B.

**11. Is there a ranking order with the methodology?**

Yes. It is ranked as method code 1A, 2, 3A, 3B, 4, and 5. The methods are listed in rank order of required use per Rule 62-210.370, F.A.C. In other words, if you have a qualifying CEMS, you must use data from the CEMS to determine your annual emissions, unless you demonstrate that one of the other methods is more accurate.

**12. Which stack tests should I use to calculate the average value?**

Use all the valid, representative tests during at least a five-year period. Please refer to this link: [http://www.dep.state.fl.us/air/rules/forms/aor/dep62\\_210\\_900\(5\).pdf](http://www.dep.state.fl.us/air/rules/forms/aor/dep62_210_900(5).pdf), Appendix B, for the regulatory language.

## V. Reporting Other Emissions

### 13. When should I report fugitive emissions?

You should report fugitive emissions when:

- a. Associated with a permitted emissions unit and SCC for which all emissions are fugitive and are quantifiable (e.g., landfill, cooling pond, etc.); or
- b. Associated with a permitted facility for which an emissions unit has been established by the permitting authority to represent facility-wide fugitive emissions (e.g., equipment leaks, maintenance painting, etc.)

**NOTE:** Fugitive PM emissions from vehicular movement or wind erosion need not be reported unless it is required by permit.

### 14. Do I have to report a summer season daily process rate or daily fuel usage rate? Do I have to report summer season daily emissions?

Yes. The summer season reporting requirement applies to all facilities statewide for units emitting NO<sub>x</sub> or VOC. And, you only have to report daily emissions (lbs/day) for NO<sub>x</sub> and VOC. You can report an average value or a typical work day value of the summer season. The summer season runs from June 1 to August 31.

## VI. Electronic Annual Operating Report Version 2010-1c

### 15. What is EAOR and where can I obtain a copy for my facility?

EAOR is the Electronic Annual Operating Report. It is a software product that allows you to submit your Annual Operating Report to Florida DEP electronically. You can download the software using this link: <http://www.dep.state.fl.us/air/emission/eaor/>.

### 16. What is the latest version of EAOR?

The latest version of EAOR is 2010-1c. You must have this version in order to complete your 2011 AOR.

### 17. What operating system must I have on my computer in order to use EAOR?

This application requires one of the following operating systems: Windows XP or Windows 7. The Division of Air Resource Management has not tested this application on the Windows Vista operating system.

### 18. Where do I get my AOR data?

You can download your facility's data by importing it from DEP using the Import from Web option on the EAOR Easy Start Menu. Once EAOR is successfully installed on your computer, the EASY Start Menu will appear upon opening the program. Click on the import from web option and the import window will appear. Then enter your facility ID # and 2011 as the Reporting Year.

### 19. What should I do if I cannot import my facility data?

You should check to make sure the EAOR version is 2010-1c. If not, you should install the new version. If you still cannot import, please call or e-mail the Division of Air Resource Management at (850) 717-9000 or [EAOR@dep.state.fl.us](mailto:EAOR@dep.state.fl.us).

### 20. Can I still submit my 2011 AOR data using the hardcopy form?

Yes. You can download a partially pre-filled copy of your facility's hardcopy form using this link: [http://appprod.dep.state.fl.us/air/emission/eaor/aor\\_hardcopy.asp](http://appprod.dep.state.fl.us/air/emission/eaor/aor_hardcopy.asp).

**21. Do I still need to send in the signature page?**

For report years 2010 and later, if the AOR is submitted electronically via the web, disk, or email, you can sign the AOR electronically. The AOR is not complete until it is signed. In order to sign electronically, you will need a user account and PIN. Information on how to sign electronically, register a user account, and downloading a PIN request form can be found here: <http://www.dep.state.fl.us/air/emission/eaor/>.

If you are submitting the first two pages, with the signature page signed, please send to DEP using regular mail to the following address:

Florida Department of Environmental Protection  
Division of Air Resource Management, MS 5500  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Don't see your question? Send one to [EAOR@dep.state.fl.us](mailto:EAOR@dep.state.fl.us)**