



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

2/5/2016

**Re: Requirement to Submit Emissions Reports for 2015
by April 15, 2016 for:**

[Facility ID]
[Facility Name]
[Address, City, State Zip]
[County]

Dear [Primary Contact]:

April 15, 2016, is the deadline for all owners/operators of Synthetic Minor Title V facilities to submit their calendar year 2015 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.**
- **Be aware of software changes for 2015 reporting year.**
- **Submit reports successfully by the Authorized Representative.**

Know the regulatory basis for the emissions reporting requirements

Failure to submit these emissions reports by the April 15, 2016, 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 2015. "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 2015 is available on the emissions reporting information page given.

Emissions Inventory Summary - Ohio EPA has the authority under OAC rule 3745-15-03 to request and receive information from regulated entities. Emissions information through emissions inventory reporting is provided to U.S. EPA to develop an annual criteria and toxic pollutant inventory. All Title V and Synthetic Minor Title V facilities are required to file a complete EIS annually.

Helpful Links

eBusiness Center

<https://ebiz.epa.ohio.gov>

Ohio EPA Customer Support Center FAQs

<http://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

Emissions Statement - The county the facility is located in was designated as nonattainment for the 8-hour ozone National Ambient Air Quality Standard in 2015. 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.

Be aware of software changes for 2015 reporting year

There are new data validation warnings for pollutant data associated with air pollution control equipment. These warning messages will NOT prevent the report from being submitted if the information is not updated. 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 require from facilities for control equipment doesn't meet the minimum requirements of the National Emissions Inventory (NEI) and won't pass that data validation. We have data indicating that control equipment is present, but the pollutant controlled, capture efficiency, and operating control efficiency are not always provided. This software change is the first step to come into compliance with the Federal rule. Ohio EPA will be looking at this information in greater detail and may require it in future reporting years. Therefore, these warnings have been implemented in order to notify the user that the data for the pollutant associated with air pollution control equipment is deficient. If the user has this information it should be provided with the 2015 emissions report or in a future Facility Profile submission.

This change is explained in detail in the Customer Support Center FAQ on Ohio EPAs web page. To view this, visit the page given in *Helpful Links* at top of this letter and search "2015 Emissions Report".

Submit reports successfully by the Authorized Representative

The Authorized Representative, (see Ohio Revised Code 3745.11.1,) must sign off on the submission of the FER/EIS. 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.

You can get assistance with Air Services from the following sources:

- **Context Specific Help** - click the word "Help" in the top right corner of any Air Services screen.
- **Searchable topics, training videos and fast responses to new questions** - The Agency "Customer Support Center" has many topics, training videos, and links to guidance on emissions reporting and Air Services. If you can't find an answer, post a new question and get a response within 1 business day!
- **Phone assistance** - We are ready to assist you!

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| Synthetic Minor applicability | District Office/Local Air Agency |
| 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