

# San Diego County Air Pollution Control District



**Virtual Training Webinar  
Data for Calendar Year 2022 Emission Inventory  
February 15, 2023**



# Webinars

- **Today's Webinar - Wednesday, February 15, 2023, at 9:00 AM (co-hosted w/ CARB Staff)** – Webinar will include introduction to the use of EIS and focus on CTR reporting and amendments.
- **Tuesday, March 7, 2023, at 2:00 PM** – Webinar will include detailed instructions for the use of the EIS Portal.
  - Registration link can be found on our website

## EIS Training Webinar

### Future Trainings:

- **Wednesday, February 15, 2023, at 9:00 AM (co-hosted w/ CARB Staff)** – Webinar will include introduction to the use of EIS and focus on CTR reporting and amendments.
  - [Register for Webinar \(Microsoft Teams\)](#)
- **Tuesday, March 7, 2023, at 2:00 PM** – Webinar will include detailed instructions for the use of EIS.
  - [Register for Webinar \(Microsoft Teams\)](#)

### Past Trainings:

- **February 16, 2022:** Recording ([YouTube link](#)) | Slide deck ([PDF](#))



# Agenda

- **Rule 19.3 Applicability**
- **Data Request &**
  - Timeline
- **EIS Portal**
  - Login & Registration
  - RO Designation
  - Uploading & Submitting 2022 Data
  - EIQ Forms
- **Resources**
  - Calculation Methods
  - Contacts & FAQ



# Rule 19.3 Applicability

## CARB AB2588 Hot Spots Program (Toxic)

- **Every 4 years**
  - Toxic Emissions, Appendix A of the EICG
  - Prioritization Scores
  - HRA Requirements if applicable

<https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots>

## CARB Criteria & Toxics Reporting (CTR)

- **Annual**
  - Mandatory Reporting Regulation Greenhouse Gas Facilities
  - Criteria > 250 tpy
  - Elevated Risk
  - **NEW APPLICABILITY – Facility with District Permits to Operate (PTO)**

<https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting>

## EPA Criteria

- **Annual**
  - 25 ton per year or more of NOx or VOC

<https://www.govinfo.gov/content/pkg/USCODE-2013-title42/html/USCODE-2013-title42-chap85-subchapl-partD-subpart2-sec7511b.htm>

## District Criteria

- **Annual**
  - 5 ton per year of more of NOx or VOC

<https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-19.3.pdf>

## Community Emission Reduction Program (CERP)


- AB617 Communities
- As Requested

<https://www.sdapcd.org/content/sdapcd/community/community-air-protection-program/portside-cerp.html>

# 2022 Data Request

- District staff have made best efforts to help identify facilities that are subject to reporting for CTR
- [List of Facilities Required to Report 2022 Data](#)
- District has sent about 2,300 Data Request Letters for DY 2022

**Please note that this list is not encompassing of all facilities required to report and if a facility is not listed, that does not mean it is exempt from reporting.**



San Diego County  
Air Pollution  
Control District

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January 18, 2023

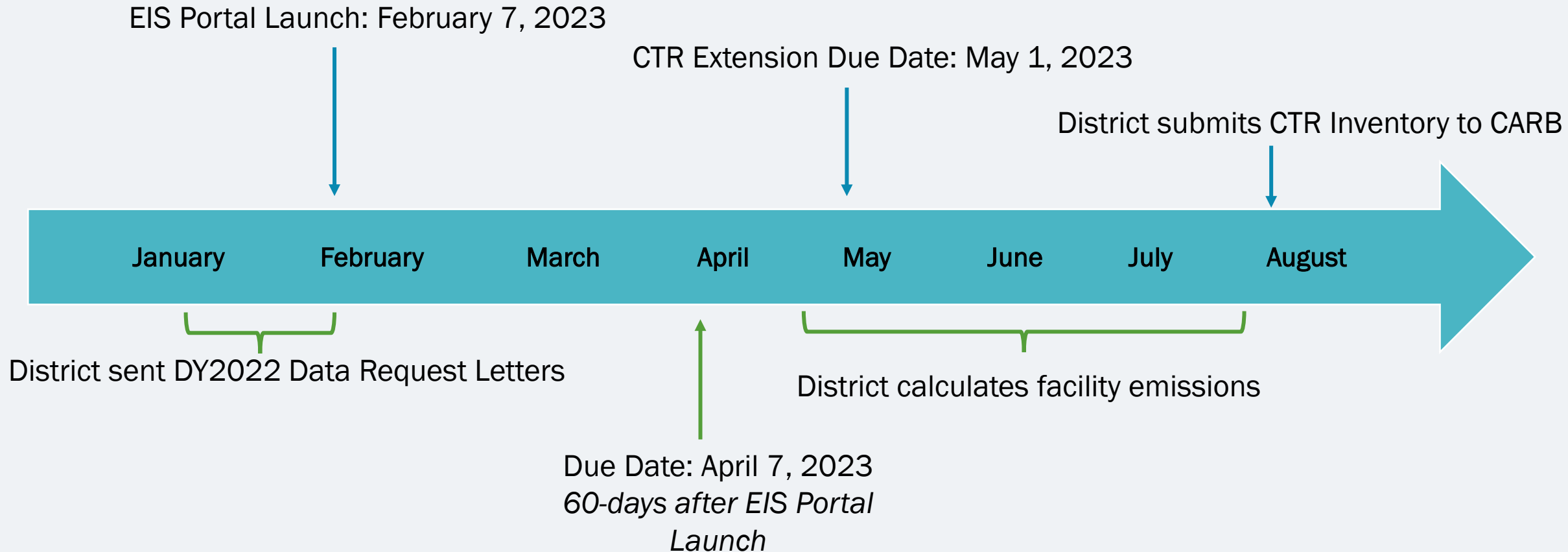
EMISSIONS INVENTORY FACILITY ID: 12345

Company ABC  
Joe Smith  
6789 Street  
San Deigo, CA 91942

**CALENDAR YEAR 2022 CTR EMISSION INVENTORY DATA REQUEST**

Local, State and Federal mandates require the San Diego County Air Pollution Control District (District) to conduct an air pollutant emission inventory for your facility. The California Air Resources Board

# 2022 Schedule



To request an extension please email [APCDInventory@sdapcd.org](mailto:APCDInventory@sdapcd.org).



# EIS Portal

<https://www.sdapcd.org/eis.html>

The screenshot shows the website header for the San Diego County Air Pollution Control District. The logo is on the left, and the text "San Diego County Air Pollution Control District" is next to it. On the right, it says "Air Quality". Below the header is a navigation bar with social media icons for Twitter, Facebook, YouTube, and LinkedIn. A large banner image shows a city skyline at dusk. Below the banner is a breadcrumb trail: "PERMITS > TOXICS AND EMISSIONS > EMISSIONS INVENTORY SYSTEM". The main heading is "Emissions Inventory System". Below this is a paragraph of text: "Starting with the reporting of emissions for Calendar Year 2021, the District's Emission Inventory System (EIS) must be used to enter emission inventory data as described in Rule 19.3. EIS allows facilities to upload Emission Inventory Request Forms, review data requests, input data for each calendar year and view the resulting inventory online after District approval." Below this is another paragraph: "EIS can be accessed at the link below." At the bottom, there is a red-bordered box containing the text "Emission Inventory System (EIS) Portal".

San Diego County  
Air Pollution  
Control District

Air Quality

PERMITS > TOXICS AND EMISSIONS > EMISSIONS INVENTORY SYSTEM

## Emissions Inventory System

Starting with the reporting of emissions for Calendar Year 2021, the District's Emission Inventory System (EIS) must be used to enter emission inventory data as described in Rule 19.3. EIS allows facilities to upload Emission Inventory Request Forms, review data requests, input data for each calendar year and view the resulting inventory online after District approval.

EIS can be accessed at the link below.

[Emission Inventory System \(EIS\) Portal](#)

# EIS Access & Registration



<http://eis.sandiegocounty.gov/Portal>

San Diego APCD - Emissions Inventory System (EIS)

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**EIS Login Page**  
EIS is Only Available from Monday to Friday, 7:00am to 7:00pm, Pacific Time



San Diego County  
Air Pollution  
Control District

Remember me

[Log In](#)

[Forgot Password?](#)

[Request Access](#)  
[Request RO Status](#)

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EIS Version 3.1.787 en-US - 13-Feb-2023  
© 2012-2023 Lakes Environmental Software






# EIS Responsible Official (RO)


- EIS Responsible Official (RO) Designation
  - One RO assigned per facility (EIF ID)
  - RO can view, grant and remove user access
  - To update RO, email both the District and Lakes
    - This can also be done with the “Request RO Status” link on the front page
  - Submittal must be completed by RO


# Uploading & Submitting 2022 Data

- Data Entry Direct


 **EI Questionnaire**  
Enter Emission Inventory Data

- EIQ Forms Download/Upload

 **EIQ Forms**  
Download and submit EIQ forms in Excel Format

 **Supporting Documents**  
Upload supporting documents for your submittal

- Submit

 **Emission Submittal**  
Submit Completed Emission Inventory



**IMPORTANT** – The inventory will be deemed complete only after it has been submitted

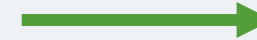
# EIQ Forms

- Current Capabilities

- Pre-rendered EIQ forms for download by each facility

- Limitations

- Cannot add/remove devices in EIQ Forms
- Cannot change calculation methods in EIQ Forms



These options are only available in Data Entry Direct/ EI Questionnaire

- Coming Soon

- Mass download/upload of forms into zip files
- Regeneration of forms to reflect updates to devices and calculation methods

# QA/QC & Submission

## QA/QC

It is recommended to run a QA/QC check on the submitted data before final submission. The QA/QC will confirm if all required data has been reported. Choose 'Run QA/QC' to run a QA/QC check. Multiple QA/QC checks can be completed and a history of the QA/QC checks can be found under 'QA/QC Files'.

Run QA/QC

QA/QC Files

## Submit


Electronic submission can only be completed after all required data has been entered, refer to 'QA/QC' above to confirm all required data has been reported. Click 'Submit' to continue to report submission.

Submit

Only an RO can submit the final report

# What's New for Data Year 2022

- Required electronic reporting through the EIS Portal
- CTR Amendments
  - Additional applicability – new reporting requirements for almost all facilities with a District PTO
  - Added Toxic Air Contaminants (TACs) to phase in, ~ 700 new TACs
    - Including PFAS related substances
  - Point Source Stack & Location Data
    - Stack/point source activity data (height, diameter, flow rate, and temperature) and location
  - Reporting Portable Equipment Diesel Engines (> 50 hP)

#	Air Permit Number	Site Record ID	Permit Description	Device ID	Device Description	Material ID	Material Description	Method Name
	All <input type="text"/>	0 <input type="text"/>		All <input type="text"/>		All <input type="text"/>		All <input type="text"/>
1	0	0	PFAS : Fluorotelomer-Related Compounds	099	Add PFAS : Fluorotelomer-Related Compounds as seen in EICG Appendix A-1. Each material should repres <a href="#">see more &gt;</a>	1	Fluorotelomer-Related Compound	PF1-001
2	1	0	Additional Substances Subject to Quantification and Reporting	099	Add any additional pollutants found in CTR Table B-2 and EICG Appendix A-1 and not quantified elsewh <a href="#">see more &gt;</a>	1	Additional Substance	S17-G01

# New for Data Year 2022

Calculator Parameters & Requests ? ^

**Calculator Name:** S07-G01      **Description:** S07-G01-Mass Balance Procedure-Based on Liquid Material Usage-After Controls      **Version:** 1

Zero Emissions  
 Capture Result

Data Requests   Control Requests   **Emission Factors**   Surrogate Pollutants

POLLUTANT NAME	POLLUTANT CODE	WEIGHT PERCENT	ORIGIN	ACTIONS
Particulate Matter (PM10) ...	85101	Implicit	Default	
Total Organic Gases (TOG) ...	43101	Implicit	Default	
Total Particulates (TSP) ...	11101	Implicit	Default	
Volatile Organic Compounds (VOC) ...	43104	Implicit	Default	
		<b>Checksum:</b>	<b>0</b>	

# Calculation Methods

1. Calculation methods are pre-selected for each device in EIS
2. If the District does not have a calculation method which fits the process, please use:
  - Emission Factor Procedure Based on Material Usage
  - Mass Balance Procedure

<https://www.sdapcd.org/content/sdapcd/permits/toxics-emissions/calculation-procedures.html>

## Calculation Procedures

Listed below are some of the general calculation procedures used by the District to calculate emissions that are used for each facility emission inventory. The emission factors listed are default factors and will be used to create emission inventories unless site-specific factors are requested and/or provided by the facilities. Site-specific emission factors may come from a wide range of data sources, including but not limited to Safety Data Sheets (SDS), source tests, Continuous Emissions Monitoring Systems (CEMS), lab analysis/samples, or manufacture's data. Sufficient supporting documentation for site-specific emission factors must be provided and approved by the District for incorporation into emission inventories.

The District uses a web-based program called EIS (Emissions Inventory System) to facilitate the implementation of the emissions inventory programs. EIS allows facilities to submit required inventory information and review their data online. Facilities that are subject to emissions inventory requirements and wish to utilize EIS may contact the District's Emissions Inventory Section at 858-586-2600 or [APCDEngineering@sdapcd.org](mailto:APCDEngineering@sdapcd.org) to set up an account. A guide to EIS can be found [here](#).

If you have questions on how to complete the data request forms, common equipment types are listed below and contain links to the appropriate calculation procedure for each equipment type. Instructions can also be found at the link below. Information regarding trade secrets can be found [here](#).

[Login to EIS](#)

[CTR - STACK Parameter Reporting Instructions](#)

Abrasive Blasting

Baking Processes

Chemical Processing Tanks

Combustion - Diesel Fired Engines

Combustion - Gas Fuels

Combustion - Liquid Fuels



# Support



- **EIS Technical Support** - including creating/modifying login information or designating an RO, please contact [EIS.support@weblakes.com](mailto:EIS.support@weblakes.com)
  - **District Support** - Please contact the [APCDInventory@sdapcd.org](mailto:APCDInventory@sdapcd.org)
- Guidelines**
- [EIS Frequently Ask Questions](#) - Online



# What is CTR?



- The Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR) is a statewide reporting regulation developed by the California Air Resources Board (CARB)
  - CTR applies to specified facilities that have been issued a permit to operate by the local air district
  - Requires specified facilities to provide emissions data, or the activity data needed to calculate emissions (fuel use, amount of material processed, etc.), to the local air district, on a specified schedule – as directed by the district (district then reports emissions data to CARB)
- After 7-year phase-in period, CTR will eventually require annual criteria pollutant and toxics emissions reporting for virtually all permitted facilities (few exceptions)
- During the phase-in, certain facilities will need to report data to the district using the district's online reporting system

# Why was CTR developed?

- The CTR was developed to acquire additional data on emissions from stationary sources – needed for several air quality programs
- Assembly Bill (AB) 197 requires CARB to provide information to the public regarding criteria pollutant and toxic substance emissions, from stationary sources, at the sub-county level
  - We will need more facility-specific emissions data than we currently collect
  - This makes data available to residents of heavily impacted communities, other CARB programs, air districts, and the general public, to identify, evaluate and address air quality problems
- AB 617 requires CARB and districts to select communities disproportionately impacted by air pollution and, with community representatives, develop plans to mitigate pollution, protect the public
  - Requires community-level emissions from all sources (mobile, area-wide, and stationary, including “smaller” sources)
  - Evaluate cumulative risk from sources, develop plans based on data

# Who is subject to the CTR requirements?



- 1<sup>st</sup> version of CTR approved 2018; applies to about 1,500 larger facilities in CA
  - Facilities that report GHG emissions to CARB MRR program
  - 250+ tons of criteria pollutants in a non-attainment area,
  - “High Priority” facilities, as designated by the district, under AB 2588 Hot Spots Program
- CTR amendments (aligned with amendments to AB 2588 Hot Spots EICG) were approved in November 2020 (begins with 2022 data reported in 2023)
  - The three categories above continue to report annually
  - Many other SDCAPCD permitted facilities will report on a phased in schedule
  - Report at least once during the phase-in period, as specified, and annually beginning in 2026
  - Phase 1 begins with 2022 emissions reported in 2023
  - 2023 is a “gap year” with non new reporting requirements

# Who is subject to the CTR requirements – Phase 1?



- Who is in Phase 1?
  - Any facility emitting over 4 tons of criteria pollutants and precursors (PM, VOC, NO<sub>x</sub>, CO)
    - Gas stations dispensing over 9 million gallons (otherwise, Phase 2)
    - 99% of auto body shops are below 4 tons of VOC (if below 4 T, and no other sources, Phase 2)
  - Permitted, diesel-powered fuel combustion (brings in several thousand facilities statewide)
  - Use of specified solvents as part of a permitted process
  - Dry cleaners
  - Plating using chromium or cadmium
  - Releases from fumigation of crops for market (post-harvest)
- Who is *not* subject to Phase 1? – Any facility not meeting core criteria or Phase 1 criteria. Examples:
  - Only permit is for fuel dispensing *and* less than about 9 million gallons/year
  - Only permit is for paint booth(s) *and* less than 4 T of VOC (99+% of body shops)
  - Only natural gas combustion less than 4 T
  - Crematories, sand-blasting, char broilers, etc., if less than 4 T

# How to report, what to report

- How to report?
  - Provide data to district through online reporting tool
  - Do not provide data to CARB, unless specifically instructed to
  - Access online reporting tool according to district
- What to report?
  - Some data may already be in the system for your facility
  - Data to be entered may include information on facility location, mailing address, industrial classification
  - Information on permitted processes and devices (unpermitted sources as directed by the district)
  - Emissions or activity data as directed by the reporting system and the district; may include emission factors
  - District will provide additional info

# What else is new for 2022 emissions reported in 2023?



- Only for facilities that report GHGs to MRR program and 250+ ton facilities: report estimate of emissions from portable diesel-powered engines use on-site, regardless of ownership or permit status
  - Includes contractor engines, PERP-registered engines (turn-arounds, maintenance, construction)
  - Can report emissions from individual units, or aggregated emissions from all units (as one source)
  - Use best available methods and data, including engineering estimates; if engine-specific information is not available, estimate the number of engines, fuel use or hours operated, use default emission factors
- For core facilities: report release location data (stack height, diameter, temperature, flow rate, velocity)
- New list of toxic chemicals to be reported, if emitted by a facility
- If emissions of a toxic substance cannot be quantified (no method or emission factor available), report amount present, used, or produced on site during the year
- Abbreviated reporting: for some sources (including emergency standby engines), emission factors are pre-populated; reporter only needs to report activity data as directed by district

# CARB CTR Contact information



- John Swanson, Manager
  - (916) 382-0997
  - John.Swanson@arb.ca.gov
- Longwen (Owen) Gong
  - (916) 323-2190
  - Longwen.Gong@arb.ca.gov
- Daniel Sloat
  - (916) 318-6337
  - Daniel.Sloat@arb.ca.gov
- CTR Website:
  - <https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting>
- Guidance, FAQs, and copy of the regulation:
  - <https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting/guidance-documents-ctr>