

Emission Inventory System (EIS) Reporting- Frequently Asked Questions (FAQs)

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Requirements

What are the required reporting programs?

There are multiple types of inventories which the District conducts under the applicability of [District Rule 19.3](#). Each program is based on different criterion, applicability, and reporting frequency, please see below:

- **Criteria Emissions Inventory (CEI) –**
 - **District Criteria Pollutants:** Facilities with 5 tons/year or more of NOx and/or VOC. **Reporting Frequency:** Annual reporting ([District Rule 19.3](#)).
 - **EPA Criteria Pollutants:** Facilities with 25 tons/year or more of NOx and/or VOC. **Reporting Frequency:** Annual reporting ([US CODE-2013-title42-chap85-subchapl-part D-subpart2-sec7511b](#)).
- **Toxics Emissions Inventory (TEI)–**
 - **CARB AB2588 Hot Spots Program** (Toxic Pollutants): The Core TEI facilities report (Toxic Emissions of Materials listed in Appendix A of the California Air Resources Board's (CARB's) Emission Inventory Criteria and Guidelines (EICG), Prioritization Scores are calculated, may trigger Health Risk Assessment (HRA) requirements, If applicable). **Reporting Frequency:** While the District processes these inventories every year, each facility is only included once every 4 years ([AB2588 "Hot Spots" Program \(H&SC 44300 et. Seq.\)](#)).
 - **Toxic Pollutants for Industry-wide sources:** For Industry-wide sources as defined in [District Rule 19.3](#). **Reporting Frequency:** Once every 4 years inventory ([AB2588 "Hot Spots" Program \(H&SC 44300 et. Seq.\)](#) and Emissions Inventory Criteria and Guidelines Regulation (17CCR 93300.5).
- **Criteria Air Pollutants and Toxic Air Contaminants (CTR) –**
 - **CARB Criteria and Toxic Pollutants:** For facilities subject to the Criteria and Toxic Reporting (Mandatory Reporting Regulation Greenhouse Gas Facilities, Facilities with criteria pollutant > 250 tons per year, facilities with elevated prioritization risk, and facilities required due to CTR amendments). **Reporting Frequency:** Annual reporting; (CTR, 17CCR 93400 et. Seq.)
- **Community Air Protection Program (CAPP) -Assembly Bill (AB) 617**
 - **Community Air Protection Program:** for facilities within a designated community, per the Community Monitoring Plan or the Community Emission Reduction Plan. **Reporting Frequency:** as needed (Community Air Protection Program (AB 617)).

More details are found on the District Rule 19.3 Emissions Information page.

How do I know if my facility is subject to reporting?

Applicability determination is the responsibility of the facility and should perform their own applicability analysis pursuant to [Rule 19.3](#).

District staff has made its best efforts to identify potential facilities, although District staff is not able to accurately identify all applicable facilities. Every year District staff will identify and attempt to notify

facilities that are potentially subject to reporting. The District will send a notification detailing the reporting period and requirements and post the list of sites subject to reporting on the District website: <https://www.sdapcd.org/content/sdapcd/permits/toxics-emissions/eis.html>

If the facility thinks that it is subject to reporting, in any year, but didn't get notified and or is not on the annual list, please contact the District at: APCDInventory@sdapcd.org, please use the subject line: (Setup needed to report Emission Inventory Requirements).

Is my facility subject to Reporting under CARB's Regulations and/or Hot Spots - AB2588?

CARB's Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR) can be found at <https://ww2.arb.ca.gov/our-work/programs/criteria-and-toxics-reporting/ctr-regulation>. The initial regulation was adopted in 2018. Amendments were adopted on November 19, 2020.

While the District staff will identify and notify the facilities which are potentially subject to CTR reporting, it is the responsibility of each facility to report emissions according to CARB's CTR Regulation.

My facility was never asked by the District to report emissions. Why now?

There are multiple reasons why a facility may be required to report, including applicability to CARB regulations or an increase in the facility's potential to emit.

The California Air Resources Board (CARB) has recently amended its Reporting of the Criteria Air Pollutants and Toxic Air Contaminants (CTR) Regulation and the AB2588 "Hot Spots" Program, to include expanded applicability so some facilities which were never required to report will may now be subject to reporting.

What If my facility is subject to reporting, but it is not listed for this year. What should I do?

The responsibility of compliance with the emission inventory programs, including applicability determination, is on the facility.

First the facility should contact the District at APCDInventory@sdapcd.org to request a Data Request Letter, then contact EIS.support@weblakes.com to set up an EIS account for reporting. Please use the Subject line: (Setup needed to report Emission Inventory Requirements).

What if my facility is listed by the District to report emissions, but I believe it is not subject to reporting in that year. What should I do?

The facility needs to contact the District at: APCDInventory@sdapcd.org and cite justification for non-applicability – cite regulatory requirements if applicable. Use the Subject line: Not Applicable to Emission Inventory Requirements).

Are facilities allowed to complete Abbreviated Reporting for Part of its Processes and/or Equipment?

The District has not prequalified any facilities with abbreviated reporting in the data year 2022. If a facility qualifies for abbreviated reporting per CTR's 93421(a) or (b), and/or it is exclusively engaged in the qualifying activities, it can request abbreviated reporting by sending an email to:

APCDInventory@sdapcd.org. If approved, then EIS facility setup will be adjusted so only the required activity level data is needed to submit the report.

Is this Reporting program or its due date affecting my Permit(s) renewal or processing?

No. The emission inventory reporting program doesn't generally interfere with the Permit processing or permit renewals, unless the District has informed you accordingly.

Can the information collected by the District's compliance inspectors be used in lieu of reporting?

No. The emission inventory reporting information is designed to be used in calculating emissions of a wide range of Criteria and Toxic Air Pollutants, to fulfil different Local, State and Federal mandates. The information collected by inspectors serves to ensure that regulated sources operate in compliance with permit conditions and all applicable regulations, but the emissions data reporting requirements are the facility's responsibilities to directly report to the District.

Will this EIS reporting replace onsite Inspectors visits or Audits?

No. The EIS reporting information is designed to be used in calculating emissions of a wide range of Criteria and Toxic Air Pollutants, to fulfil different Local, State and Federal mandates (including CTR reporting). The information collected by inspectors serves to ensure that regulated sources operate in compliance with permit conditions and all applicable regulations, but the emissions data reporting requirements are the facility's responsibilities to directly report to the District.

Deadlines and Extensions

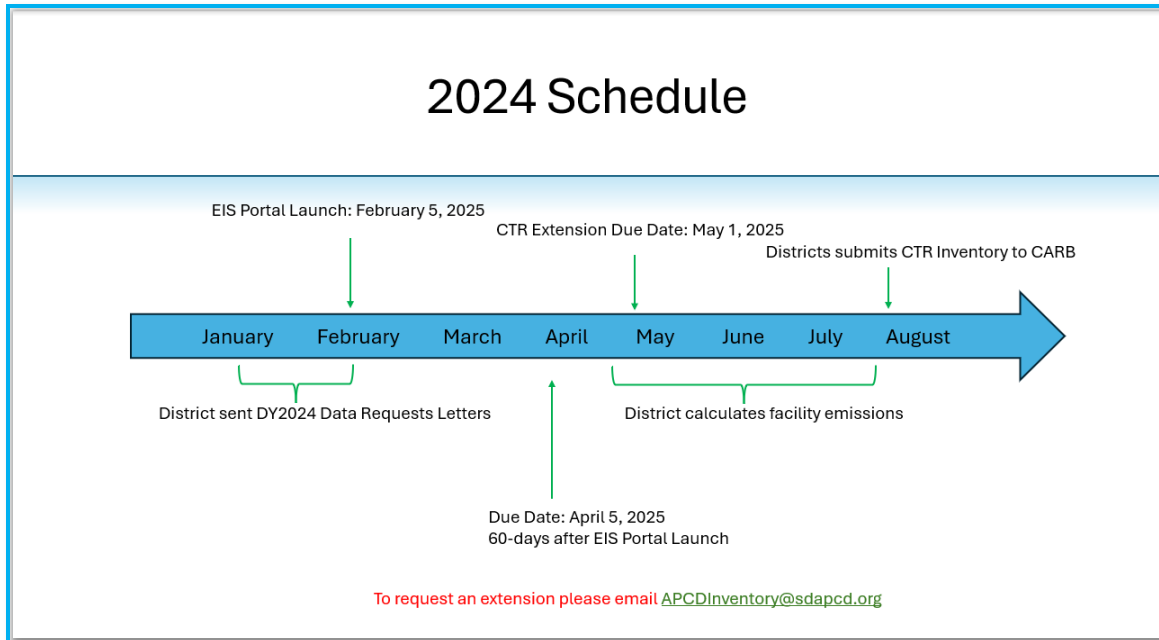
What is the deadline to report my data?

The data must be submitted to the District's [Emissions Inventory System \(EIS\)](#) no later than 60 days from the date listed on a Data Request Letter or May 1st of the reporting year, whichever is sooner.

If the [Emission Inventory System \(EIS\)](#) is not available to the public till after the date listed on the Data Request Letter, then the deadline is 60 days from when EIS is available to the public. Refer to the District EIS Webpage for more information.

What is the 2024 CTR reporting timeline and deadline for submitting my data?

The 2024 data year reported in 2025 shall follow the following timeline:



How can I request an extension? And, if approved, what would the extended due date be?

Per District [Rule 19.3](#), extensions may be granted on a case-by-case basis and is dependent on the inventory type reported.

To request an extension, the facility must contact the District at APCDInventory@sdapcd.org (Use the subject line: Data Submittal Extension Request). In your request, identify your facility using the Emissions Inventory Facility ID (EIF ID) or Site Record ID, which is listed in the top portion of the facility's Permit to Operate (PTO). Extensions can be granted based on the inventory type reported. Typical extensions are summarized below:

Type of Inventory	Initial Deadline to Submit	Maximum Extension Allowed
Criteria Pollutants (District Rule 19.3)	60 days after District request	60 days (For a total of 120 days after District request)
Toxic Pollutants AB2588 (including Industry-wide)	60 days after District request	120 days (for a total of 180 days after District request)
The Criteria and Toxic Reporting Regulation (CTR, 17CCR 93400 et. Seq.)	60 days after District request	Maximum Extension granted deadline is May 1
Community Air Protection Program (CAPP)	60 days after District request	As determined by the District

What should I do if I missed my deadline or/and my extended deadline?

If the facility missed the initial deadline, they could request an extension by contacting the District at APCDInventory@sdapcd.org.

If the facility missed the extended deadline, the facility maybe subject to enforcement action and they need to work on a corrective action with the District, by contacting APCDInventory@sdapcd.org to explore what options the facility has. In both situations, please use the Subject line: (Missed my reporting deadline), in your email to the District.

The facility shall make all efforts to meet its deadline or extended deadline to avoid any potential enforcement actions, such as Notices of Violations (NOV) and potential penalties.

Access and Setup

I do not know my facility EIF ID. How can I request that?

You can request this information by contacting the District at: APCDInventory@sdapcd.org. Please use the Subject line: (Need to know my Facility EIF ID).

In your request, please identify your facility name, address and Site Record ID as being listed in the Top Portion of the Facility's Permit to Operate (PTO), see below for example:

San Diego County Air Pollution Control District
10124 Old Grove Road, San Diego, CA 92131
Phone (858) 586-2600 Fax (858) 586-2601
www.sdapcd.org

Sectors: 2, F
Site Record: APCD1993-SITE-00000

Permit Record: APCD2020-PTO-00####

Supervisor: Earham St, SAN DIEGO, CA 92101

Equipment Address: Earham St, SAN DIEGO, CA 92101

PERMIT TO OPERATE
EXPIRES: November 30, 2023

This permit is not valid until required fees have been paid.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

What is the Emission Inventory System (EIS) Portal Responsible Official (RO) designation? and how does it differ from the agent/user one?

There are two user types for the EIS Portal:

- Agent – User access to EIS for input/upload
- Responsible Official (RO) – User access to EIS for data input/upload, control agent access, and responsibility for submitting the electronic report.

The role of Responsible Official (RO) has been added for each facility within EIS. The assigned RO will be able to view, grant, and remove user access to the facility account. To expedite reporting, current facility contacts in the District's data bases have been assigned to the RO role.

The current RO designation for facilities is published in the District Website, please refer to [List of Facilities Required to Report 2024 Data](#).

Please note that: all users will need to register with the EIS portal. If you previously had an account for the EIS Portal, an activation email will be issued to you confirming your access for data year 2022. If you are a Responsible Official (RO) for a facility but did not previously have an account on EIS, a registration email will be sent to your email address, The registration email will contain a link to complete the registration process.

How can I change the facility's Responsible Official (RO)?

The current RO designation for facilities is published in the District Website, please refer to [List of Facilities Required to Report 2024 Data](#). The District will send an EIS registration email to the designated RO of the list and if they fail to register for any reason (changed roles, retired etc.), the facility can assign new personnel to become the RO by contacting: EIS.support@weblakes.com. Make sure to have your Facility's EIF ID and an active email address.

Can I have multiple Responsible Officials (RO)s for my facility?

Yes, however the Emissions inventory correspondences will be directed to only one RO, therefore inactive RO's should be removed from the account to ensure proper communication in the future.

Can a single user be an RO for multiple Facilities in EIS?

Yes, however, registration for EIS should be initiated with only one facility (EIF ID) and then other EIF IDs can be added to the account after registration. Contact EIS Technical Support at EIS.support@weblakes.com, to request adding the other EIDs to your account.

Can I use the same RO log-in (email/password) that I used to submit data in previous years?

All users will need to register with EIS Technical Support at EIS.support@weblakes.com to be able to use the EIS portal. If you previously had an account for the EIS Portal, an activation email will be issued to you confirming your access for the data year.

If you are a Responsible Official (RO) for a facility but did not previously have an account on EIS, a registration email will be sent to your email address. The registration email will contain a link to complete the registration process. If you are an agent, registering to assist in the reporting process, an email will be issued to the facility RO(s) notifying them of your pending request.

I forgot my email/password. What should I do next?

You can retrieve a password from the login page of the EIS Portal, by clicking 'Forgot Password?'

For additional support related to access, contact EIS Technical Support at EIS.support@weblakes.com. Be ready to provide the EIF ID of your facility and the email address you have used previously.

I contacted EIS Support but did not receive a setup confirmation email. What should I do?

1. Make sure you emailed the correct email address for EIS support (EIS.support@weblakes.com).
2. Follow-up by forwarding the original email to EIS.support@weblakes.com and copying the District at: APCDInventory@sdapcd.org.
3. You should receive a response in 2-3 Business days.

What if I want multiple users to have access to the EIS Portal for my facility?

It is possible for multiple users to be granted access to EIS. However, all users must register by contacting EIS support (EIS.support@weblakes.com). The role of Responsible Official (RO) has been added for each facility within EIS. The assigned RO will be able to view registered users, and grant and remove registered user access to the facility account.

How do I report a status change for my facility (Non- Operation, Change of Ownership, Sale of Business, etc.)?

If your facility has had a status change, updating your District permits is required.

Keeping up to date records with the District is important to receiving accurate information. The District's permit system is used for multiple purposes, including permits processing and renewals, compliance, and emissions inventory.

For emissions inventory reporting purposes, the facility needs to contact the District at APCDInventory@sdapcd.org (Please use the Subject line: Status Change of my Facility). In your request you need to identify your facility using EIF ID or Site Record ID (listed in the Top Portion of the Facility's Permit to Operate (PTO)).

To update Permitting and Compliance Facility records and contacts, you need to contact Permit Processing at: apcdpermits@sdapcd.org, or call (858) 586-2600 and request to speak to the Permit Processing Aide on duty.

How does a facility status change affect my reporting requirements?

It depends on when the change took effect during the reporting year.

If the facility was sold during the reporting year, both old and new owners are responsible to provide data, each for their respective ownership period, or if agreed, a single owner may report all the data.

If the facility retired or switched to non-operational status mid-year during the reporting year, the facility must still provide data for the part of the year they operated.

Using the Emissions Inventory Portal (EIS)

How do I use the EIS Portal?

The Emissions Inventory System (EIS) is a web-based program that can be accessed at [Emission Inventory System \(EIS\) Portal \(http://eis.sandiegocounty.gov/Portal\)](http://eis.sandiegocounty.gov/Portal).

Users must log-in with their registered email and password. New users must complete registration with a valid email address. Anyone interested in creating an EIS account should contact EIS Technical Support (EIS.support@weblakes.com). An active email account will be required for the EIS account setup. Account users should expect to receive an email from EIS Technical Support (Lakes Environmental), detailing current user status and login instructions.

For instructions on how to input and submit data, please see the ([Emission Inventory System \(EIS\) Portal User's Guide](#)) posted on the District website on [Emission Inventory System Webpage](#).

The District has recorded previous EIS Training Webinars for reference and can be found on the District website on [Emission Inventory System Webpage](#).

How do I access my facility Information?

The Emissions Inventory System Portal (EIS) users must log-in with their registered email and password to access the facility information. Users interested in creating an EIS account must identify their EIF ID and/or Site Record ID, as listed in the District website ([List of Facilities Required to Report 2024 Data](#)), and contact EIS Technical Support at (EIS.support@weblakes.com) to register and obtain login information.

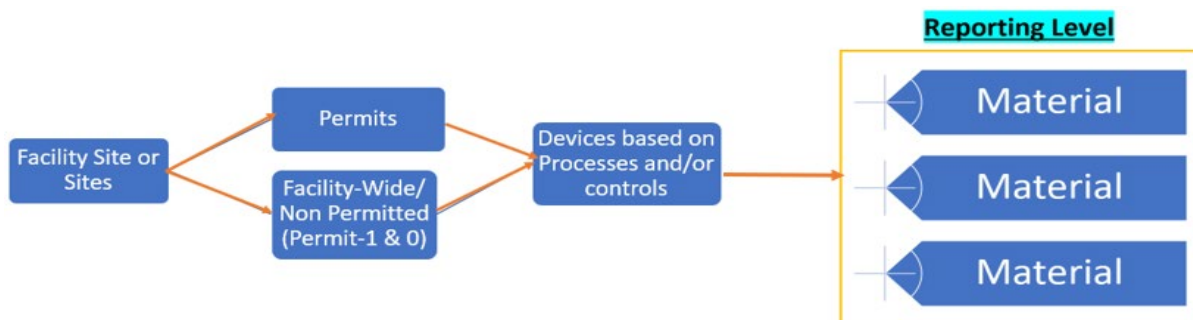
How are my equipment set up in EIS for reporting?

Every facility is presented in EIS, according to the following:

The system is built to include air emissions from all sources at the facility, whether it is a permitted equipment or non-permitted operation.

The system divides each permitted or non-permitted operation into devices, based on processes and/or controls, and asks for reporting throughputs of materials used by these devices.

Most processes ask for a few mandatory information (such as material annual usages, material maximum hourly usages), required activity data, some optional information, and any control methods applied to the equipment and/or process.



- **Permitted Devices:** the District has set up at least one device and one material for reporting. Some facilities can have more devices/materials listed based on historical reporting(s). The facility can add more materials, replace old materials, and/or delete materials that are no longer used in the device. Please note that a deleted material will not be visible to the facility in EIS in future reporting(s) and the facility would need to add it again. If future use is expected, rather than permanently delete the material, the facility should enter zeros in the mandatory fields or use the Zero Emissions function in EIS for that material.
- **Non-Permitted Devices:** Data and equipment/process/operation emissions that are not directly related to a specific permit are listed under Permit (0)- Non-Permitted Devices. Some examples include non-permitted portable diesel engines less than 50 brake horsepower (BHP) on site, welding operations not subject to permit requirements used to repair some equipment onsite, and solvents used to clean several equipment onsite.
 - o If the facility would like to report control methods, it must either be verifiable by the permit documents or by supporting documents provided by the facility.

- If the facility is reporting non-permitted operations usage under Permit 0 in EIS and claiming Capture and Control efficiency, they must provide supportive documentation to justify this information (e.g. Capture equipment specs, setup/layout narrative and photos, Control efficiency specs).

The facility can add additional materials if the materials are different substances, used at different locations, or have different capture/controls.

Which Calculation Method should I use?

Select the calculation method that best represents the permit/device/equipment/operation for the material data based on the equipment description, if the equipment is permitted then the calculation method selected must comply with the permit and permit conditions.

The devices/materials set up in EIS doesn't match the operations at my facility. What should I do?

The facility can modify the set-up of its operations at the device level and material level. Changes in the device level must be reflected at the material level also. The facility can add, delete, or modify materials as needed. For instructions on how to change Device/Material setup of the facility, please see the [\(Emission Inventory System \(EIS\) Portal User's Guide\)](#) posted on the District website on [Emission Inventory System Webpage](#).

Can I add a missing Device?

Yes, the facility can add, delete, or modify Devices as needed. For instructions on how to complete that, please see the [\(Emission Inventory System \(EIS\) Portal User's Guide\)](#) posted on the District's website on [Emission Inventory System Webpage](#).

Can I add more materials or delete existing materials?

Yes, the facility can add, delete, or modify materials as needed. For instructions on how to complete that, please see the [\(Emission Inventory System \(EIS\) Portal User's Guide\)](#) posted on the District website on [Emission Inventory System Webpage](#).

How do I start entering emission data?

To enter your data in EIS, you can use one of two main routes:

1. Input data directly in EIS, using either one of the two modules: Data Entry Direct, or EI Questionnaire. To enter data with Data Entry Direct, please click the specific Permit, then Device, and finally the Material (Permit→Device→Material). With EI Questionnaire, all the materials are listed in the table and each material is listed in a single row of that table, so please click on the specific material row to enter data. The user must save after inputting data for each material.
2. Download the Emissions Inventory Questionnaire ((EIQ) workbook from EIS, complete the spreadsheet, and then upload it to EIS using the EIS Import functions.

Please note the following:

- When using the first option, reporting data will be grouped under specific permits. On the other hand, when using the second option, the EIQ workbooks groups similar sources from across the facility in one type of workbooks. For example, if you downloaded EIQ workbook F01, it would reflect all the Coating operations on the site, regardless of which permit this operation is attached to. Each sheet will be identified by its Permit/Device to facilitate reporting accurate data.
- *PLEASE NOTE: If the facility used EIS to directly input partial data and then uploaded EIQ workbooks to update part of the data, the EIQ upload will **overwrite** the data that was input initially, **and it will be lost**.

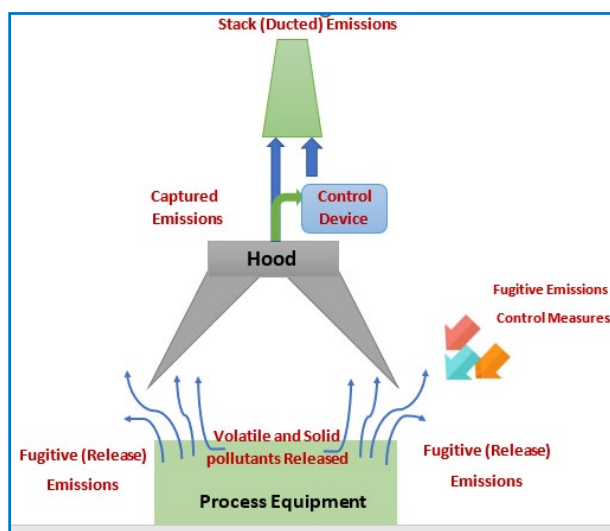
For step-by-step guide for using EIS, please visit the ([Emission Inventory System \(EIS\) Portal User's Guide](#))

What does Stack (Ducted) and Release (Fugitive) mean in EIS reporting?

Stack (Ducted) Emissions are captured and collected and either emitted from a stack or vented through a control device and then emitted from a stack.

Release (Fugitive) emissions are emissions that are not captured by a collection system. They are emissions from sources other than stacks or ducts.

See figure below for an example (for illustration purpose only)



What does Capture and Controls refer to?

The way air emissions are released vary depending on the processes and equipment. Listed below are some ways emissions can be released:

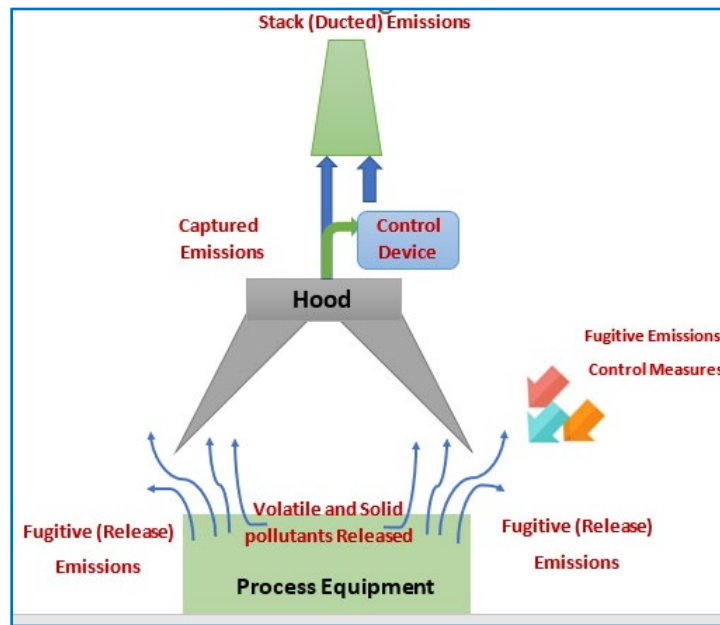
- Collected and vented through a stack,
- Collected, controlled, then vented through a stack.
- Released as uncontrolled fugitives.

- Fugitive that has some control method applied (for example: watering of haul Roads to control dust fugitive pollutants)
- Combination of any of the options above.

Please note that while some control methods/devices can reduce or control gaseous and/or both volatile and non-volatile (such as solid particulates) components, others are only capable of reducing one or the other. The District uses the following definitions for the terms below:

- **Capture efficiency** is defined as the percentage of emissions captured and vented through a specific route.
- **Control Efficiency** (solids, gaseous or volatile, non-volatile) is a measure of how much a given control method/device is contributing to the reduction of the (solids, gaseous or volatile, non-volatile) emissions resulting from the device/process operation. Control efficiency is the ratio of the emissions released by a control device to the emissions introduced to the control device, expressed as a percentage.

See figure below for an example (for illustration purpose only)



Please Note:

- A control efficiency can never be greater than 100%.
- The sum of the capture efficiency fields for both Stack (Ducted) and Release (Fugitive) must equal 100%.

Where can I find my Permitted equipment Controls?

Please review the equipment description and Permit conditions, of the inventory year Permit renewal document (PTO), for controls of the equipment or its operation.

If controls are not part of the PTO equipment description and/or PTO condition, the facility needs to submit supportive documentation to validate reported controls, subject to District approval.

What is overall control efficiency?

Overall control efficiency means the efficiency of the total system, calculated as the product of the capture and control device efficiencies, expressed as a percentage. For example, if only 50% of the process air emissions are captured by the control device and this control device is only capable of removing 90% of the pollutants in the air stream received, the overall control efficiency = $0.50 \times 0.90 = 0.45$ (i.e., 45%).

What if I have a control method not listed in the permit description or the equipment controls list?

If the equipment has a control device not listed in the permit description or reflected in EIS calculation method options, the facility can notify the District by submitting a note listing permit/device/material ID explaining any pertinent details and submitting along any supporting documents. All these documents can be uploaded in the Supporting Documents section of EIS.

If the facility is reporting non-permitted operations usage under Permit 0 in EIS and claiming Capture and Control efficiency, they must provide supportive documentation to justify this information (e.g. Capture equipment specs, setup/layout narrative and photos, Control efficiency specs, etc.).

What if I have multiple controls methodologies?

If the equipment has more than one control method/device and not all are reflected in the EIS calculation method options, the facility can notify the District by submitting a note listing permit/device/material ID explaining any pertinent details and submitting along any supporting documents. All these documents can be uploaded in the Supporting Documents section of EIS.

What if my Equipment has no stack, can I fill zero in EIS for all the stack information?

This answer will cover avoiding reporting issues when filling the stack information in EIS. For technical information on the type of information required, please visit [CARB's Criteria and Emissions Inventory Guideline Regulations](#)

Stack technical information	If the equipment has a stack	If the equipment has no stack
Height Above Ground (ft):	Fill per CARB requirements	EIS will accept zero input value
Diameter (ft):	Fill per CARB requirements	EIS will accept zero input value
Exhaust gas flowrate (cfm):	Fill per CARB requirements	EIS will accept zero input value
Exhaust gas temperature (f):	Fill per CARB requirements	EIS will accept zero input value
Stack location		
Longitude (decimal degrees)	Must enter a value based on stack location or per CARB requirement	EIS will accept any value between -180.0 and + 180.0. May use the facility location in google map for approximate value.
Latitude (decimal degrees)	Must enter a value based on stack location or per CARB requirement	EIS will accept any value between -90.0 and + 90.0. May use the facility location in google map for approximate value.
Datum	Choose between nad 83 or nad 27	Pre-populated by the district as nad 83
Is this location confidential?	Choose between nad 83 or nad 27	Pre-populated by the district as no

I downloaded and filled the EIQ workbook(s) but am having issues uploading it to EIS.

How can I fix it?

If the facility has technical issues with the use of the database, including downloading and uploading EIQ workbooks, please contact EIS Technical Support at (EIS.support@weblakes.com) for assistance.

Please thoroughly review the EIQ workbook(s) prior to EIS upload to confirm all the required data is included. If any required data is missing, the upload will fail. Fix the upload errors, correct them and re-upload as needed.

How do I save the data that I have just entered?

The facility must save the data entered for each material in EIS before moving to the next material or clicking on any other material, Device, or Permit. The saved data, whether it is partial or complete, will be available in EIS before the facility finalizes the reporting by completing the Emission Submittal step. For more details, please see the ([Emission Inventory System \(EIS\) Portal User's Guide](#)) posted on the District website on [Emission Inventory System Webpage](#).

Can I save partial data and exit the EIS Portal, or I will lose it?

Yes, you can. The facility can save partial data and exit EIS. Before clicking on any other material, Device, or Permit, please click "Save," or else the data entered under that material will be lost.

The saved data, whether it is partial or complete, will be available in EIS the next time you log-in.

Can I download my data in a PDF or Spreadsheet Format (Excel)? (edited)

While the download is not available in EIS currently, the facility can contact the district to request a copy of its data submitted in EIS in either PDF or spreadsheet formats. For more details, please see the ([Emission Inventory System \(EIS\) Portal User's Guide](#)) posted on the District's [Emission Inventory System Webpage](#)

What kind of supporting documents are required for different process/equipment usage reporting?

While the District is not mandating supporting documents for general reporting, the facility should provide supporting documents in certain situations. The District can only give general examples of supporting documents that can help in verifying information, material or site-specific emission factors, and any emissions controls not enforceable by the permits.

Each data set is unique and may require additional District approval by the District's Monitoring & Technical Services Division (MTS) to be accepted for calculating the facility's emission inventory. The facility should visit the [District's Emission Calculation Procedures](#) and review each relevant Emissions Inventory Instructions. Some examples of supporting documents include, but are not limited to the following:

Process type	Information type	Example of Supporting documents	Limitations
Coatings	VOC, Density, % Solids by weight, Pollutant Concentrations	Coating's Product Data Sheets (PDS), Environmental Data Sheets (EDS), Material Safety Data Sheets (MSDS) or Safety Data Sheets (SDS)	No limitations if the reported values match those in the documents
Mineral industry/ Landfills	Site specific Emission Factors, Moisture content, Silt content	Site specific Grab sample analysis, Lab analysis, Soil test analysis, Silt content	Bulk sample/soil samples – accepted if sampling location and preferably testing protocol are pre-approved by the District. Results should be approved by MTS. Moisture Content Samples – accepted if test results cite method used, preferably align with permit conditions for regular testing and moisture content levels.
Energy facilities	Equipment Specific Emissions Factors	CEMS Data, Source Test	Source Tests – accepted if the protocol was approved or created by the District MTS. ST results must be approved by MTS.
Power Equipment	Equipment Specific Emissions Factors	Source Test data	Source Tests – accepted if the protocol was approved or created by the District MTS. ST results must be approved by MTS. Gas Samples – accepted if test results are from a laboratory and the test method used is cited. Preferable to have Chain of Custody (COC,) although not required
Polyester Resin	VOC, Density, Pollutant Concentrations	Material PDS, EDS, MSDS, SDS	No limitations if the reported values match those in the documents
Printing	VOC, Density, Pollutant Concentrations	Material PDS, EDS, MSDS, SDS	No limitations if the reported values match those in the documents
Degreasing and Solvent Cleaning	Density, Pollutant Concentrations	Material PDS, EDS, MSDS, SDS	No limitations if the reported values match those in the documents
Welding/ Soldering	Pollutants	Welding Rod Material PDS, EDS, MSDS, SDS	No limitations if the reported values match those in the documents
Processing Tanks	Pollutant concentrations in Mixed materials	Mix recipes and its components Material PDS, EDS, MSDS, SDS	No limitations if the reported values match those in the documents
Metal Deposition/ Thermal Spray	Pollutant concentrations in Deposited materials	Deposited material recipes and its components Material PDS, EDS, MSDS, SDS	No limitations if the reported values match those in the documents

How can I upload supporting documents to EIS?

The facility can upload supporting documents in EIS using the “Upload Documents” function. For more details, please see the ([Emission Inventory System \(EIS\) Portal User’s Guide](#)) posted on the District website on [Emission Inventory System Webpage](#).

How do I submit my report?

After the facility has input all the necessary data in EIS, it must be finalized by submitting the report. District [Rule 19.3](#) mandates that: a person subject to this rule shall Submit, with the completed report, a statement by the person, or a responsible official, certifying that the information contained in the form is accurate to the best knowledge of that person or official.

The facility can fulfil the submit part in EIS by using the (Emissions Submittal) function. For more details, please see the ([Emission Inventory System \(EIS\) Portal User’s Guide](#)) posted on the District website on [Emission Inventory System Webpage](#).

What to Report

Which emissions do I report?

If a facility is subject to reporting, then all emissions from facility operations must be reported regardless of whether emissions are from permitted sources or not.

The emissions included in an inventory are typically from stationary emitting devices required to have District permits, which are located or operated at a stationary source, but are not necessarily limited to these source types. Emitting devices that are exempt from permit requirements may also be included in these emission inventories if they emit substances that are required to be quantified. Emissions from mobile sources, natural sources and accidental releases are not required to be reported or included in these emission inventories.

Emissions should include criteria pollutants and toxic air contaminants (TACs), including TACs defined as exempt compounds in District Rule 2, but included in [Appendix A \(A-1\) of EICG Regulation](#). Criteria pollutants are Volatile Organic Compounds (VOC), Carbon monoxide (CO), Nitrogen oxides (NOx), Sulfur oxides (SOx), Carbon monoxide (CO), and Particulate Matter (PM). Toxic air contaminants (TACs) are identified in Tables I through III of [District Rule 1200](#).

Note that usage and emissions from the following facilities/categories are NOT subject to reporting requirements under the CTR reporting requirement:

- Facility/entities that are subject to reporting greenhouse gas emissions pursuant to Title 17, CCR 95101:
 - o Suppliers of Transportation Fuels
 - o Electric Power Entities
 - o Natural Gas Distribution Facilities
- Emissions associated with the following sources:
 - o Emissions from internal combustion engines used for irrigation pumps
 - o Emissions from open burning – fields, agricultural waste, prescribed forest burns or permitted open burning
 - o Emissions from tactical support equipment

What If I have multiple locations?

Each separate, non-contiguous location is considered a different Stationary Source, as defined by District Rule 2(b)(47)- Adopted & Effective 6/30/99, is assigned a Site record ID by the District. Each stationary source is required to submit data separately whenever the site is required to report.

What if I have Multiple Sites in the same location?

The district usually requires reporting of multiple sites at the same location as one Stationary Source if each site is under common ownership or control. Per District Rule 2(b)(47), a Stationary Source is defined as:

"Stationary Source" or "Source" means an emission unit or aggregation of emission units that are located on the same or contiguous properties and which units are under common ownership or entitlement to use. Stationary sources also include those emission units or aggregation of emission units located in the California Coastal Waters.

The District follows the definition of a "facility" from Sec. 44304 of the Sec. 44304 of the California Health and Safety Code.

If you received separate data requests for multiple sites that meet the single "Stationary Source" criteria, please contact the District at APCDInventory@sdapcd.org. Please use the Subject line: Consolidating Emissions Reporting for Multiple SITES).

All sources at a Stationary Source must be reported, regardless of if the reporting sites shares common ownership.

What Is the difference between permitted and non-permitted equipment?

Permitted Equipment is equipment the District has issued a Permit to Operate (PTO), according to District Rule 10. In EIS the permitted equipment is labeled by its Permit To Operate (PTO) ID and linked to a device(s) and material(s) records for reporting.

In addition, equipment/processes/operation emissions that are directly related to permitted equipment or processes that are considered permitted, even though they themselves may not require a specific permit need to be reported. For example, emissions from materials used in preparing surfaces before being sprayed in a permitted spray booth or solvents used for clean-up in the spray booth are considered permitted emissions and should also be reported under the "permitted" emission sources.

Equipment or processes that are not required to have a PTO are identified by District Rule 11 and considered non-permitted equipment. Emissions from non-permitted equipment need to be reported to the District if they emit substances that are required to be quantified. In EIS the facility can report non-permitted equipment data under Permit (0)- Non-Permitted Devices, for example non-permitted portable diesel engines less than 50 brake horsepower (BHP) on site.

In addition, equipment/processes/operation emissions that are not directly related to a specific permitted equipment or processes but used in different or parts of the facility need to be reported under Permit (0)- Non-Permitted Devices. For example, welding operations not subject to permit requirements used to repair some equipment onsite, solvents used to clean several equipment onsite.

Why do I need to provide information for both permitted and non-permitted equipment?

Facilities are required to report all emissions from all facility equipment and operations, both permitted and non-permitted, if they emit substances that are required to be quantified. Emissions data from the facility's equipment and processes, is required by state and federal air quality management programs and is used to compile the emission inventory for the District.

It is the facility's responsibility to report all applicable sources and substances. More details are found on the District Rule 19.3 Emissions Information page

How do I report no usage for a piece of equipment?

For no usage of device/material, the facility must input zero in all the mandatory fields in EIS to avoid QA/QC errors or use the Zero Emissions function. If the facility wishes to submit more information regarding this reporting, they can submit a note with permit/device/material ID explaining any pertinent details. Notes can be uploaded in the Supporting Documents section of EIS.

What is mandatory information? Is reporting mandatory information sufficient?

The mandatory information is the minimum information required to fulfill the reporting requirements or mandate. It is the basic information needed to calculate air emissions resulting from the Process and/or materials reported.

The mandatory information fields are highlighted in **green** in EIS, except for emission factors. If the Mandatory information is incomplete the facility will not be able to submit their electronic emissions inventory report, as the database will reject it.

Once you have reported only mandatory information, EIS will allow you to finalize the reporting and the District will consider it complete.

What are the benefits of reporting non-mandatory information?

Most of the non-mandatory data is associated with specifying controls or providing more details about a process. Reporting non-mandatory information can help the District create a more accurate evaluation of the facility's emissions.

Non-mandatory information are fields available in EIS for reporting data which are not highlighted in any color.

What if the facility wishes to use a different calculation method than the District's standard methodologies?

If the facility would like to propose calculation methods that differ from the District's standard methodologies, adequate supporting documentation must be provided to the District by May 1. Proposed calculation methods are subject to District's approval. Please contact the District at APCDInventory@sdapcd.org (Please use the Subject line: Proposed use of a calculation methods that differ from the District's).

What if the facility wishes to use emission factors that are equipment or site-specific (such as Source Tests, Sample analysis, Engine Certification Information, etc.)?

If the facility would like to propose using Emission Factors that differ from the District's default factors, then adequate supporting documentation must be provided to the District, and it will be subject to District approval. The facility can input the proposed Emissions Factors in EIS (if possible), upload supporting documents to EIS and submit a note with permit/device/material ID explaining any pertinent details. Notes can be uploaded in the Supporting Documents section of EIS.

Do I report data for contractor's equipment used at my site?

Yes. It is the facility's responsibility to collect and report the data, from the calendar year of interest, for contractor equipment used onsite. Contractor's data can be reported under Permit-0.

Off-road portable equipment such as bulldozers, excavators, backhoes, and other off-highway construction trucks are not required to report under CTR reporting, however if the facility is being inventoried under a different reporting program, it must be included.

Do I report emissions from portable equipment?

Yes. CARB's regulatory programs require reporting emissions and activity data from portable diesel engines, rated at a maximum brake horsepower (BHP) of 50 or more, that are operated onsite. Other portable equipment shall only be reported if the District requires it.

Can we aggregate reporting for portable equipment?

Yes. CARB's regulatory programs allows aggregation for portable diesel-fired equipment, however, if the facility wishes to use engines specific controls or Emission factors, each equipment shall be reported separately under EIS.

Documents and Reports

How do I view previous years EI submittals?

If a facility has been inventoried by the District in the past, you can find past submittal documents through the following steps:

Search for Air Toxics Inventory Documents in the District's (Public Documents Library) at <https://www.sdapcd.org/content/sdapcd/doclibrary.html>

If the data is not saved in the library, please contact the District at APCDInventory@sdapcd.org to request the document. Please identify the EIF ID and use the Subject line: (Need a Copy of Previous years Submittal), in your email to the District.

Can I download my data in a PDF or Spreadsheet Format (Excel)?

While the download is not available in EIS currently, the facility can contact the district to request a copy of its data submitted in EIS in either PDF or spreadsheet formats. For more details, please see the ([Emission Inventory System \(EIS\) Portal User's Guide](#)) posted on the District's [Emission Inventory System Webpage](#)

Can I download a submittal receipt from EIS?

This feature is not currently available in EIS. However, after finalizing the data submittal, the Facility can use the browser to download or print the EIS Portal Submittal page showing the status as "submitted". You can see the progress and status of your submittal in EIS dashboard, as explained in the ([Emission Inventory System \(EIS\) Portal User's Guide](#)) posted on the District website on [Emission Inventory System Webpage](#).

If the facility wished to receive an acknowledgment email by the District, please contact the District at APCDInventory@sdapcd.org . Please identify the EIF ID and use the Subject line: (Need a submittal acknowledgment), in your email to the District.

How long should I keep my emissions reporting data?

Facilities shall retain emissions reporting data and documentation on site for at least five years. The data shall be made available to the District upon request ([District Rule 19.3.\(c\).5 -Effective 12/09/21](#))

Help, Tools, and resources

Where can I find default emission factors or emission calculation procedures?

The District's calculation methods and default emission factors are posted in the [District's Emission Calculation Procedures](#) Webpage.

Where can I find coatings technical information (VOC, Density, % Solids wt., Pollutants Conc.)?

There are several types of sources that may be used to collect or calculate this type of information. Most of this information can either be downloaded from the web or requested from the manufacturer/suppliers. The following is a list of some examples; however, sources are not limited to this list:

- **Product Data Sheets (PDS)**- the best option for air emissions purposes and most should list all or most of the required information.
- **Material Safety Data Sheets (MSDS) or Safety Data Sheets (SDS)**- SDSs do not always include all the information needed for air emissions calculations. However, it may include some of the information needed, or relevant information, that can be used to determine the required data. For example, if density was not listed, but specific gravity (sg) is listed, facilities can use the sg value to calculate density. Arkansas Department of energy and the environment has a summary on How to Use an SDS or Product Data Sheet for Air Emissions.¹
- **Environmental Data Sheets (EDS)**- EDS is a document that gives information regarding environmental considerations and often will have information needed.
- **Equipment Specific Manufacturer Specifications** – Some equipment will only be operated using certain material(s) specification.
- **Manufacturer's/Supplier's Website**- Manufacturer/supplier will list some of the information needed under the product specifications in their website.

¹ https://www.adeg.state.ar.us/poa/enterprise-services/industry/pdfs/business_assistance_msd.pdf

- **Manufacturer's/Supplier's Contact**- Sometimes the facility can request technical document and information directly from the product's Manufacturer/Supplier.

Please note that for all coatings the District requires facilities to upload supporting documents that validate the values used for coatings technical information (VOC, Density, % Solids by weigh, Pollutants Concentrations).

What units should my data be reported in?

Units for reporting data are identified in the EIS Portal, next to each parameter. For example, if the field is asking for Annual usage, it may say Annual Material Usage (gallons/year).

The District also has three types of reference documents posted in the [Calculation Procedures Webpage](#) (Reference document for the type of operation, Emissions Inventory Instructions, and Emission Factor Tables). Each document explains the calculation method and identifies the units of each parameter.

Emission Factors units for each process type are listed in their respective Emission Factors Table documents.

If the facility is using Site/equipment-specific Emission Factors (EF), they must report them in the correct units, as shown in EIS. Note: Supporting documents for Site/equipment specific EFs must be submitted by the facility in EIS.

Can I use engine-specific certification emission factors?

While the District uses default Emission Factors for diesel engines, it allows the facilities to use certification, or engine specific, Emission factors for certain pollutants. The facility must fill the certification relevant fields in EIS (Engine Manufacturer, year, Family Number, Engine Tier, Engine rating, etc) and convert the Emissions factors to the correct units before inputting it in the EIS Portal.

How to convert units of the Engine's EFs?

Converting EF from certifications for certain engine families:

- Please use Diesel Particulate Matter (DPM) Emission Factor, in the correct units, to update values for both PM10 and TSP.
- If certified engine family emission factor is in g/kw-hr, then:

$$(g/kw-hr / 1.341 [bhp/kw]) * 43.16 [lbs-bhp-hr/g-1000 gal] = [Lb/1000Gals]$$
- If certified engine family emission factor is in g/hp-hr, then:

$$g/hp-hr * 43.16 [lbs-bhp-hr/g-1000 gal] = [Lb/1000Gals]$$
- If EF provided as NMHC + NOX, then assume: 95% is NOX and 5% VOC.
- If EF provided as Total Hydrocarbons (THC) or Total Organic Gases (TOG), then assume: VOC is (0.884 * THC).
- Note that, it is assumed that HC and NMHC are the same as VOC (ROG) for emissions estimation purposes.
- If the THC in the Engine's Certification, it is considered to be the same a TOG for emissions estimation purposes.
- In the case of diesel engines, DPM=TSP=PM10.

Where can I find more information?

For more details regarding particular operations, guidelines, calculation methods, and default Stack Parameters, and Default Emission Factors- Please refer to the [District's Emission Calculation Procedures](#).

For step-by-step guide for using EIS, please visit the ([Emission Inventory System \(EIS\) Portal User's Guide](#))

For live and/or recorded training workshops, please visit the District website at: [Air Toxics "Hot Spots" and Emissions Inventory Programs Webpage](#) and the [Emission Inventory System Webpage](#).

For [EIS Technical Support](#) – please contact EIS.support@weblakes.com :

- Registration/EIS Access
- Changing/Updating RO designations
- System/Upload Issues

For [District Emissions Inventory Team Support](#) - please contact the APCDInventory@sdapcd.org:

- If you have questions regarding any of the issues listed in this FAQ document
- Questions related to data requested or data to be reported
- Updates to materials/devices not possible through the current EIS setup

[San Diego APCD website](#) has detailed information regarding reporting programs, Rules and guidelines and more resources.