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MCTA Air Conference

Online Permitting and Reporting – Tips and Tricks and What You Need to Know

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November 29, 2018
Boston, MA

Introduction

- Agenda
  - Discussion of which website to use
  - Tips for SR/GHG Reporting
  - Tips for online permitting system
  - Common mistakes

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MassDEP – Two Systems

- eDEP
  - Source Registration and GHG Reporting
  - Asbestos Removal
  - Construction/Demolition
  - Environmental Results Program Annual Certifications
  - Toxic Use Reduction
- ePlace Portal
  - Apply for Online Permit/License/Authorization
  - Make Payments Online

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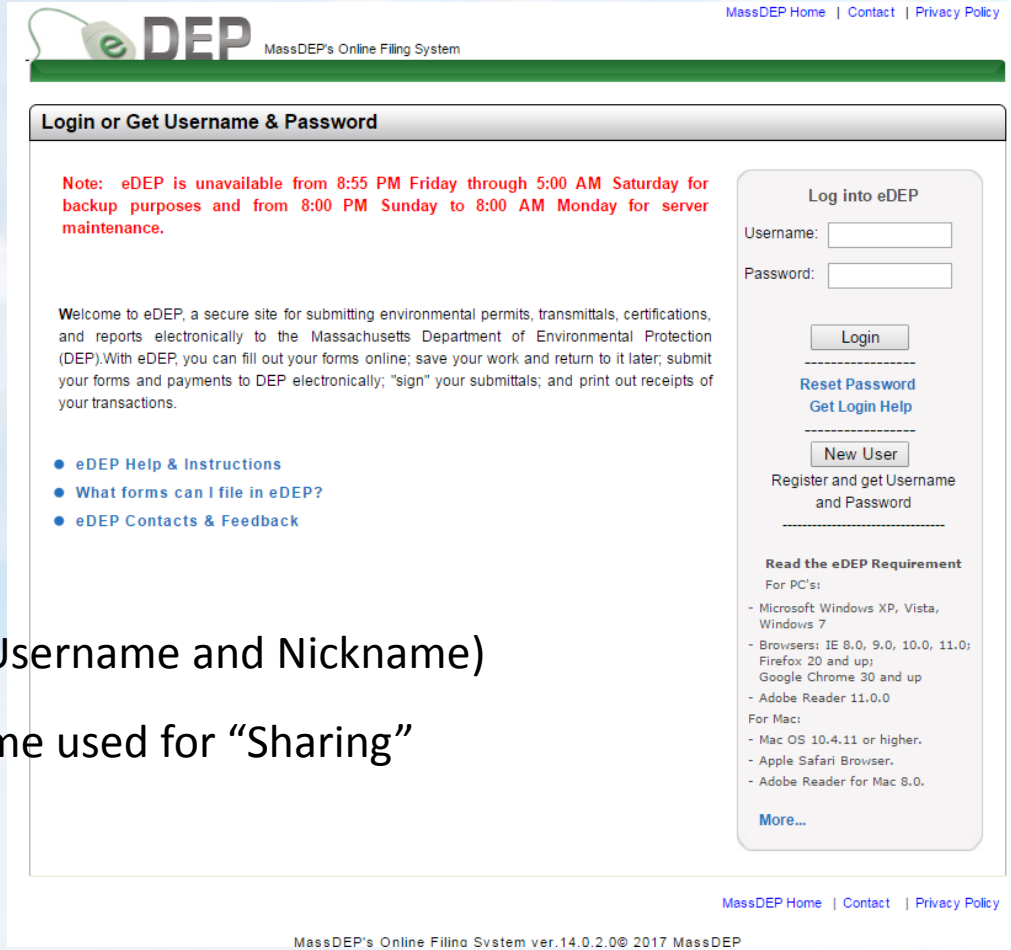
eDEP edep.dep.mass.gov/edep/



Login (Username and Nickname)

Nickname used for “Sharing”

See also:
https://www.mass.gov/edep-online-filing-for-massdep-environmental-permits-reports

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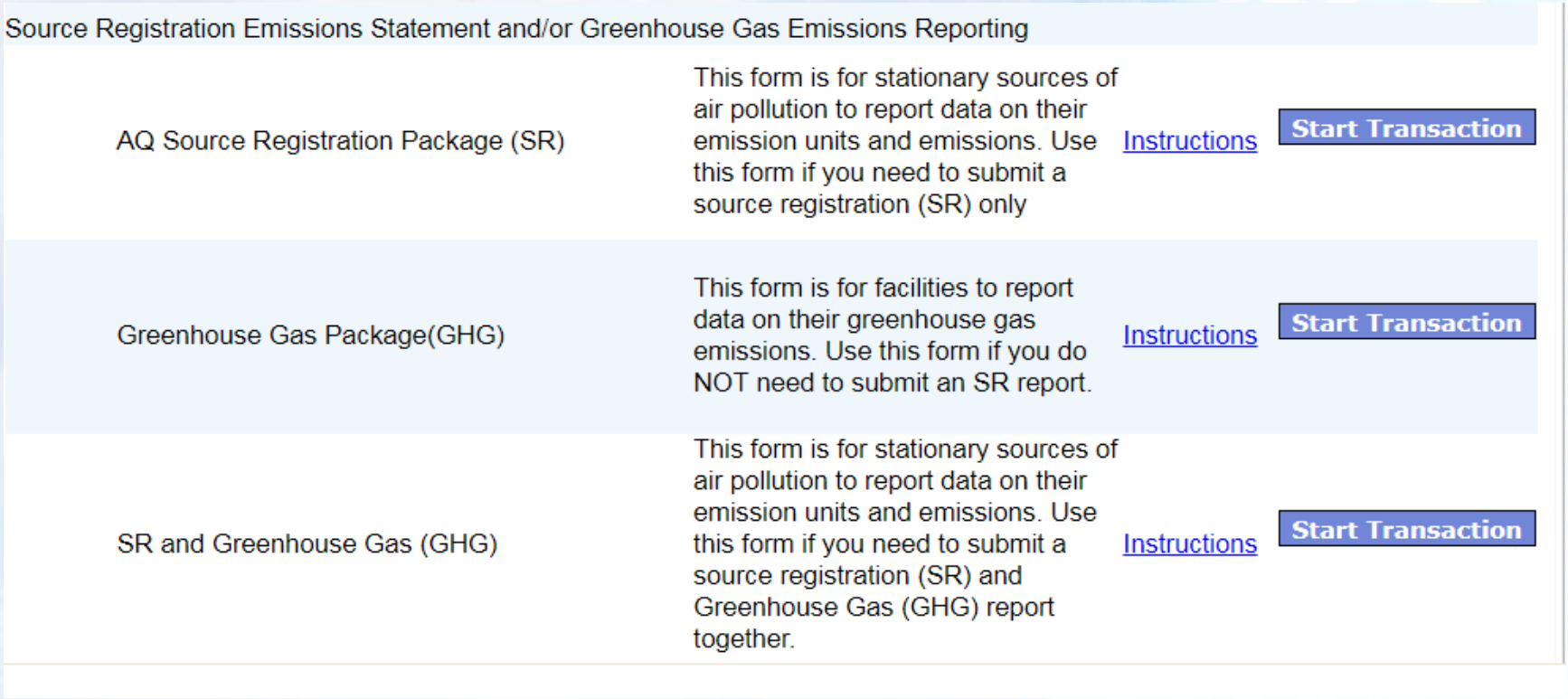
New Packages

- Forms→ Air & Climate



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SR/GHG – Reporting Dates

- CY2016
  - Due October 19, 2018

- CY2017
  - Expected to re-open eDEP before Christmas
  - Due approximately 2 months later

- Small Sources Deferred to CY2018
  - < 40 MMBTU/hr facility-wide
  - Expected to be removed from SR reporting list

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SR/GHG - When to File (Normally)

- Annual-GHG
  - All GHG Reporters – April 15
- Annual-SR
  - SR Title V Operating Sources - May 1
  - Restricted Emission Status & Others - June 1
- Triennial-SR
  - Every three years - April 1

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What You Need to Get Started

- Facility Tax Identification Number (TIN)
- Facility AQ/SEISS identifier

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Getting Started Tips

- If your facility name has changed or if newly reporting, notify MassDEP before you start
- Add new sources at the beginning – can delete later if not needed

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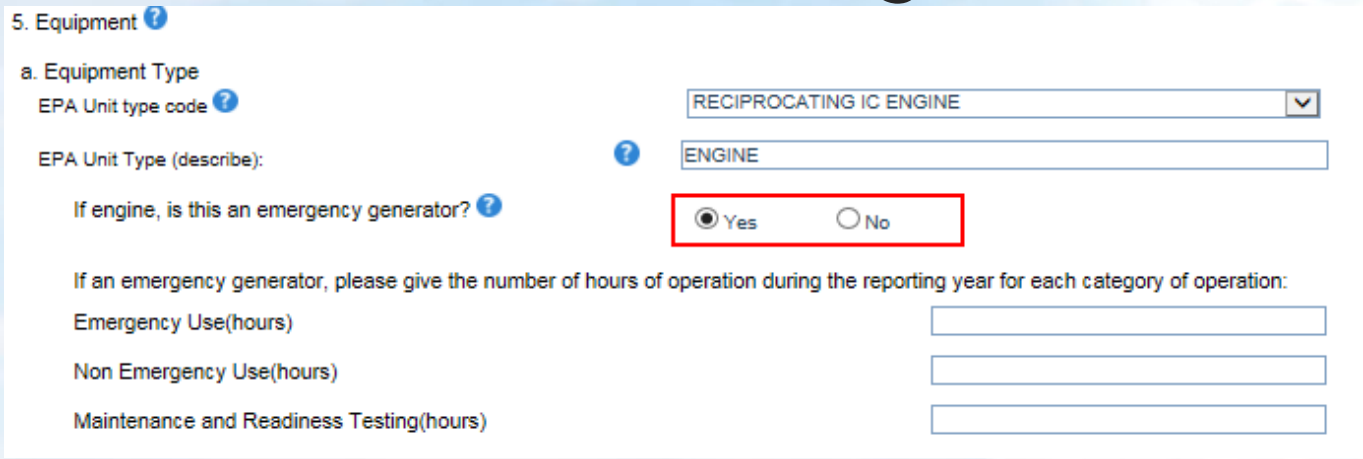
Changes to Emergency Engines

- Remove 300 hour restriction, can use 500 hours for potential
- Specify that engine is emergency
- Need to enter emergency, non-emergency and maintenance/testing hours



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Tips on Reporting Pollution Control

- Pollution Control Devices
  - Selective catalytic reduction (SCR)
  - Fabric filters/baghouse
  - Oxidation catalyst
- Things that are NOT control devices
  - Low NOx burners
  - Flue gas recirculation
  - Flares at landfills

Note: While the above are not reported as control devices, their effect on emissions/emission factors can be taken into account when reporting emissions.

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Organic Material Storage Reporting

- Organic material: Any organic chemical compound (OCC) or mixture that contains an OCC
- Applies to above or below ground storage containers ≥ 500 gal
- File an AP-2 form for tanks > 40,000 gal
- Does not include:
  - Waste tanks
  - Lube oil tanks
- Units can be combined if:
  - They store the same material
  - The containers are of the same construction
  - The combined storage volume does not exceed 50,000 gal

Source Registration – Common Mistakes

- Wrong Source Classification Code (SCC)
- Units must match SCC
- Height of stack is from ground
- Report all EUs including idle units
- Report temporary units onsite >120 days
- Report thermal oxidizer fuel usage as 2nd fuel in process forms
- Don't forget to submit!

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New for GHG Reporting

- MassDEP to align with USEPA GHG Reporting
- No longer have to report
  - Mobile sources
  - Refrigerant leaks
  - Small Miscellaneous GHG Sources
- No written guidance on this yet (only verbal)
  - Jordan Garfinkle, MassDEP

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MassDEP Resources

- How to File: Tips, Factsheets, Instructions, Training, SC Code, Emission Factors
  - https://www.mass.gov/guides/massdep-source-registration-greenhouse-gas-reporting
- Help with eDEP
  - https://www.mass.gov/service-details/edep-help-contacts
  - BAW.eDEP@state.ma.us

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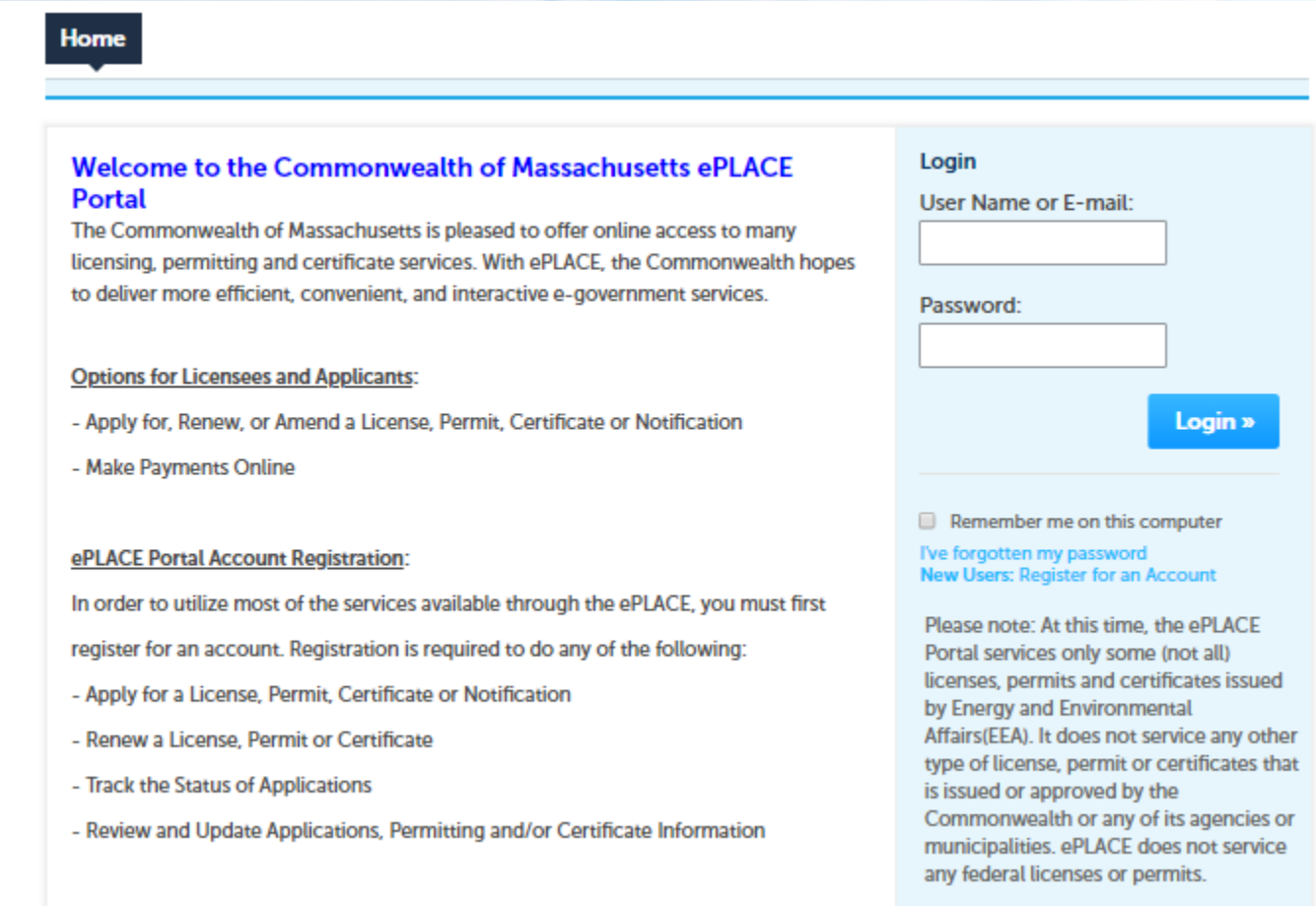
ePlace

https://permitting.state.ma.us/CitizenAccess/



Quick start guide
https://www.mass.gov/files/2017-06/eplace-user-manual.pdf

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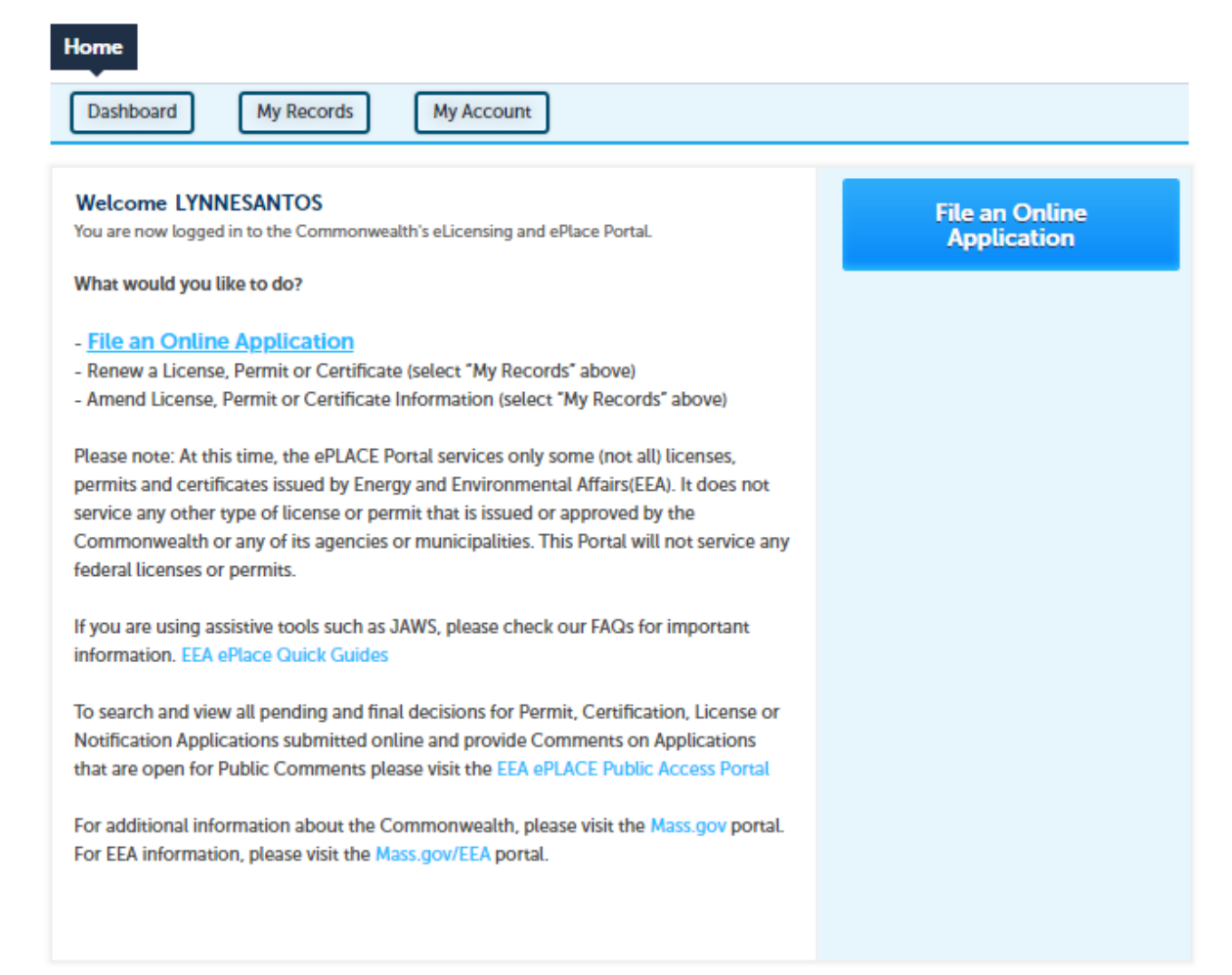
Filing An Online Application

- Home Button→ File an Online Application



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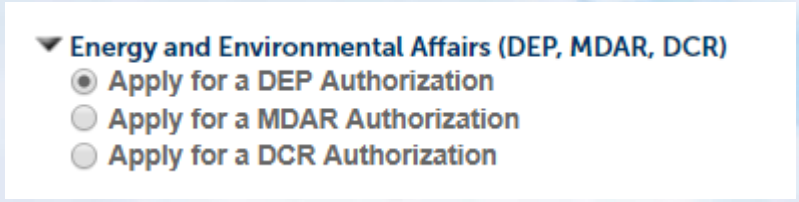
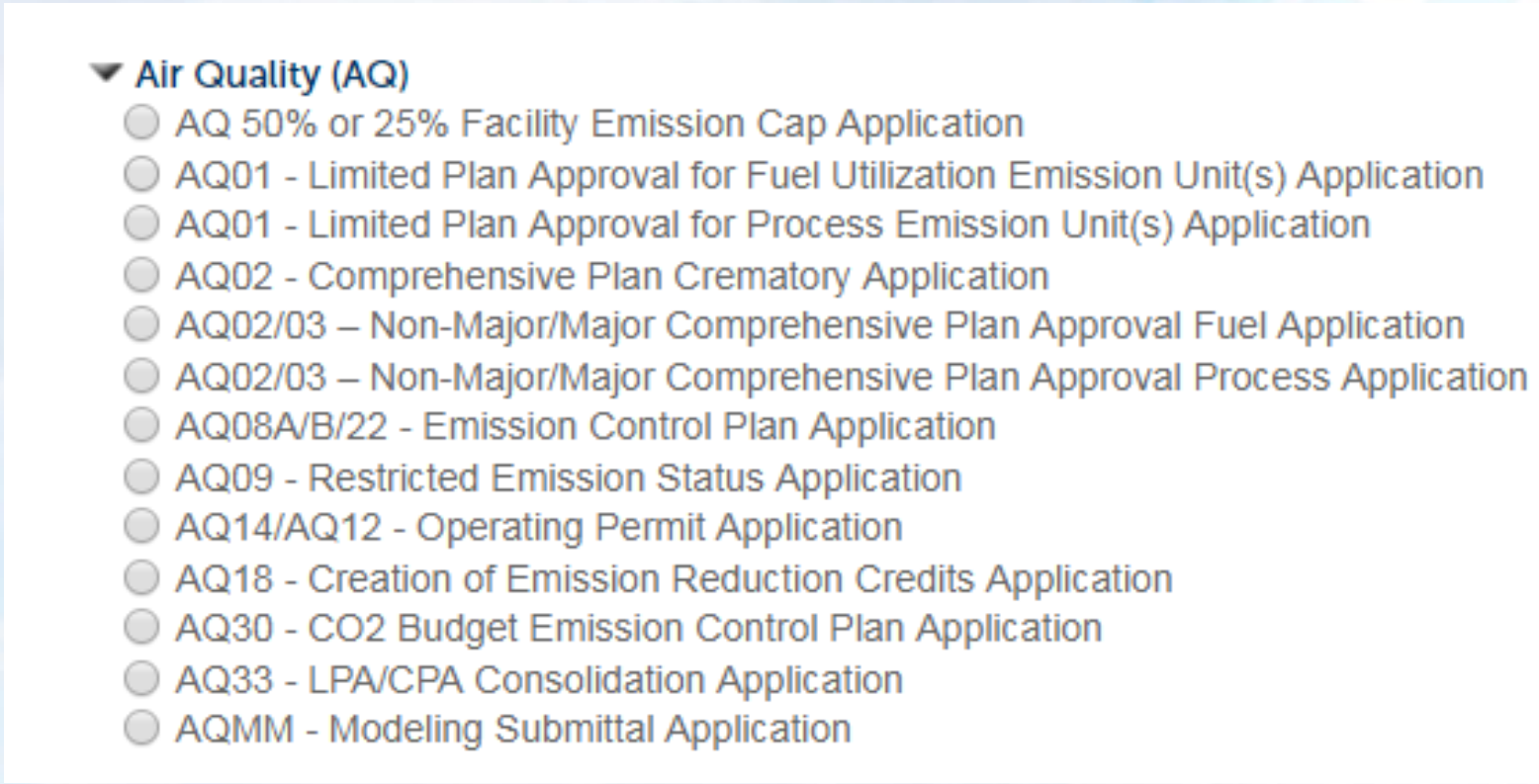
Air Quality Applications





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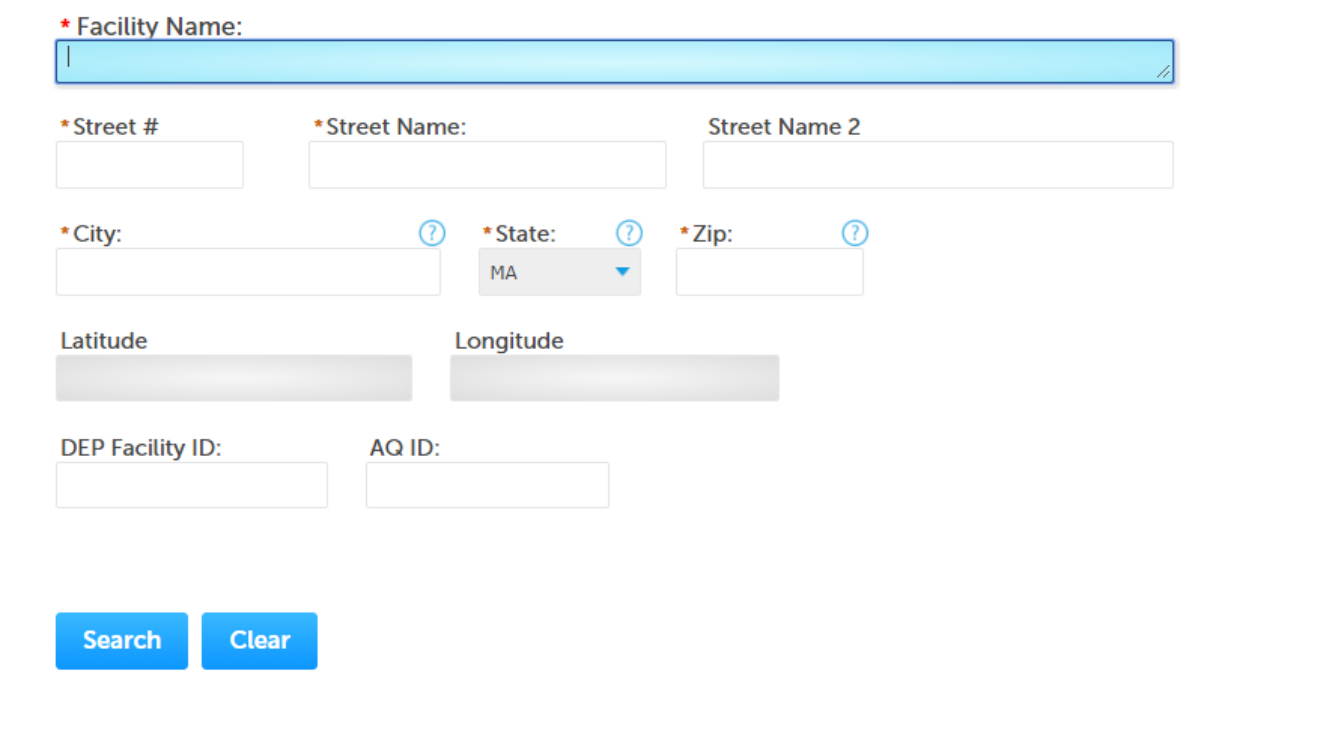
Facility Information

- Search for Existing Facility or Add New



Tip: Make every effort to find your facility. Type fewer words, or search by town – it causes issues if you make a duplicate facility in the system.

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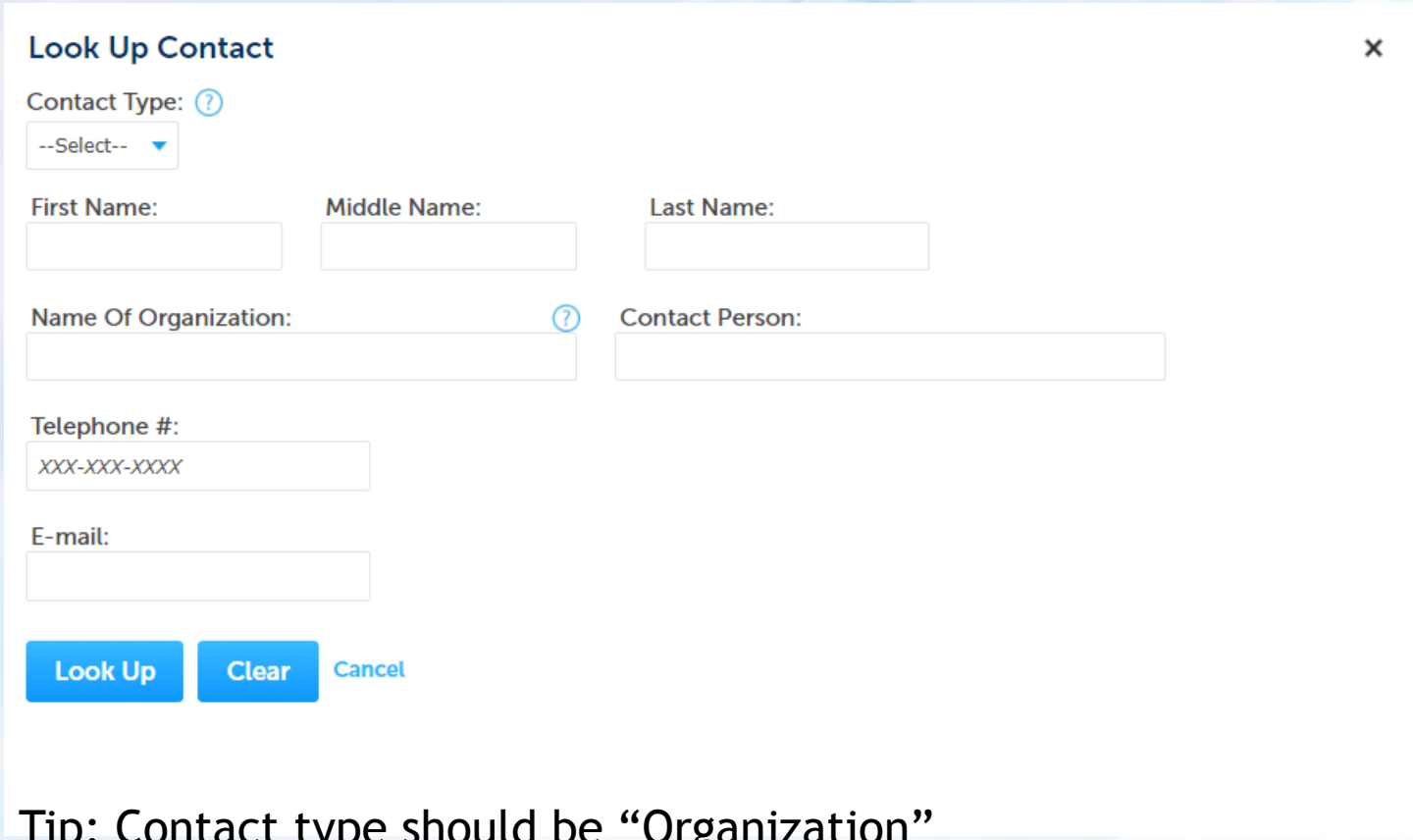
Contact Info

- Search for Existing Contact or Add New



Tip: Contact type should be “Organization”

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Adding a "Delegate"

- Delegate can be Responsible Official (RO), Professional Engineer or other editor
- Press "Save and Resume" Button
- A PIN # will be e-mailed to you
- Share this number with the Delegate
- Once RO is added as Delegate to application, can choose them as "Signatory Authority"
- For NMCP applications, RO must use the PIN that the PE generates when the PE signs

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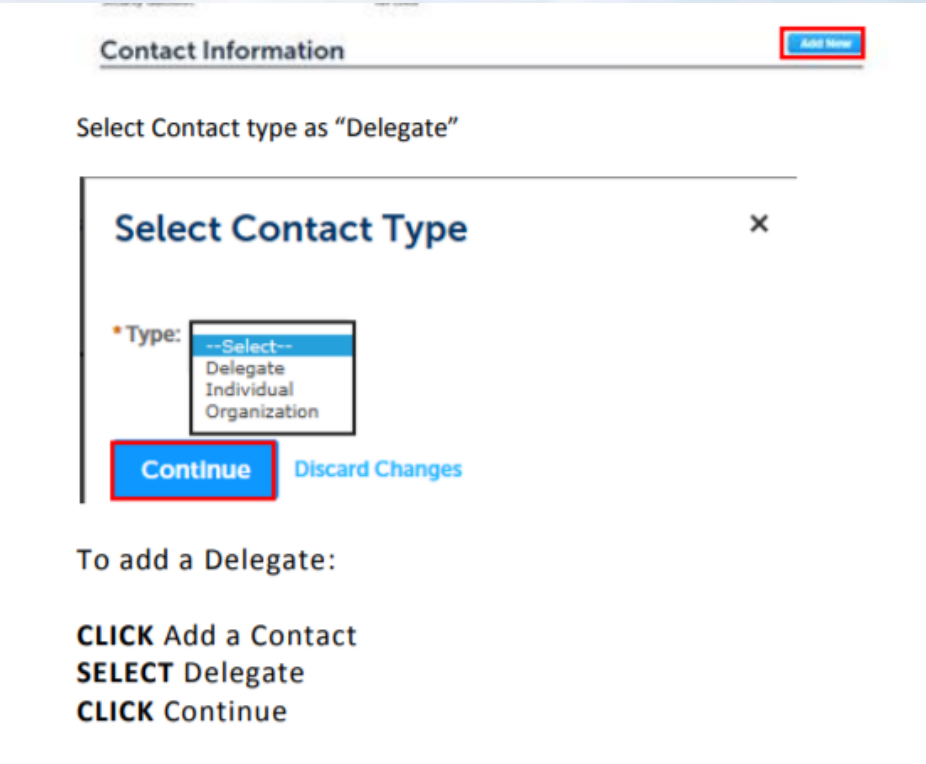
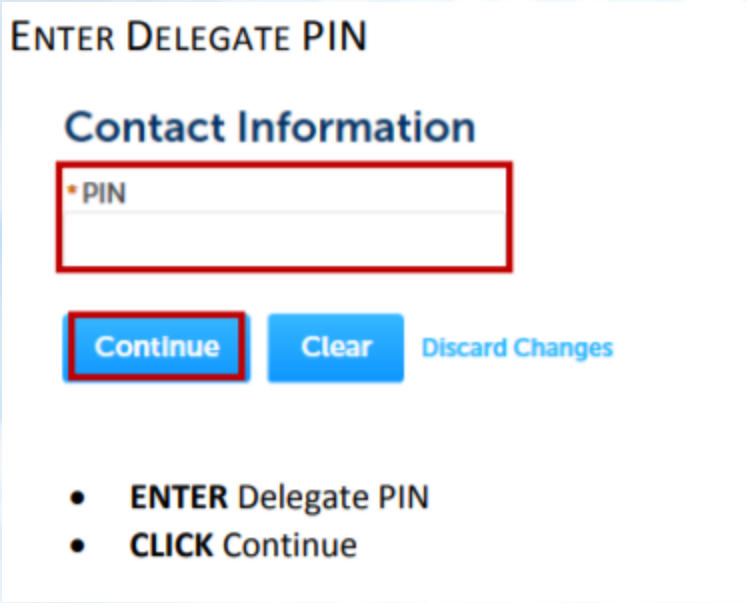
Become a “Delegate”

- Receive PIN # by email
- Login to your account and go to Account Management





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Certify, Submit & Pay

- RO Logins and Clicks “Resume Application”
- Choose “Pick Up Where I Left Off”
- All Data Appears on Certification Page for Review
- Can Choose “Edit” if Need to Edit
- Or Choose Continue
- Click “I Agree that I am the Applicant”
- Can Choose to Pay Online or Mail in Payment

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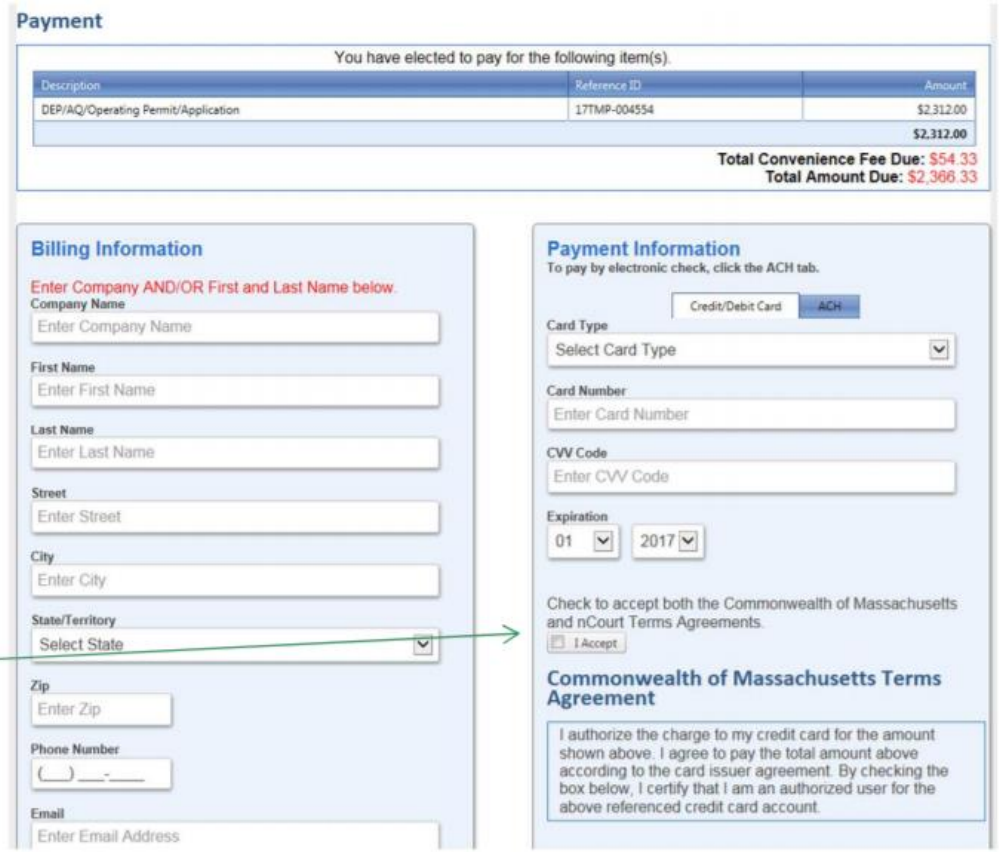
Pay Online

- If you choose “Pay Online”, you will be brought to this screen
- Provide all payment and billing information
- Accept the terms and conditions
- You will be e-mailed a receipt



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Successful Submission

- You must sign email and mail it in

To meet Federal Reporting requirements for EPA's Cross-Media Electronic Reporting Rule (CROMERR),
you are required to print this entire email, and to sign the below certifying that you have submitted the Application identified in this email.

This form must be signed and mailed to the address below. Failure to complete this step may result in delay of review of your application.

I certify that I have submitted application # 18-AQ02/03F-099999-APP

Printed Name _____ Signature _____ Date _____

Please return signed document to:
MassDEP
ePLACE Confirmations
One Winter Street
Boston, MA 02108

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Step By Step Instructions - Plan Approvals

- https://www.mass.gov/guides/massdep-air-plan-approval-applications#prepare-submit-your-application

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Step By Step Instructions – Operating Permits

- https://www.mass.gov/guides/massdep-operating-permit-compliance-program#operating-permit-applications-forms

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Permit Applications – Common Mistakes

- Save your work frequently
- Note that the system will time out
- Upload all requested documents
- Do not upload zipped documents
- Only the RO can update a re-opened application
- Can’t save and continue for a re-opened application
- Don’t forget to submit, pay and sign and mail in the e-mail!

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Thank you

Questions?

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