



Air Toxics Emissions Inventory Reporting Frequently Asked Questions

Information updated February 2024

DEQ created this resource to address commonly asked questions about the 2023 Air Toxics Emissions Inventory Reporting requirements. Title V, Standard, and Simple ACDP permitted facilities must report their toxic air contaminant emissions inventory for calendar year 2023 to DEQ (or LRAPA) by July 1, 2024. Visit the [Air Toxics Emissions Reporting](#) webpage for more information.

Common questions about air toxics emissions inventory reporting

1. What is an emissions inventory?

An emissions inventory, or EI, is an accounting of emission quantities discharged into the atmosphere by equipment or activities from industrial facilities. For an air toxics emissions inventory, this includes the amount of each toxic air contaminant emitted from each individual emissions-producing unit or activity. A list of toxic air contaminants recognized by DEQ is available in Table 1 of [Division 247 Health Risk-Based Air Quality Standards for Toxic Air Contaminants](#).

2. Are the 2023 ATEI reporting requirements different from the 2020 ATEI?

No, the current reporting effort is largely the same and the reported information should be similar but with 2023 operating data. Differences could arise if there were a change in the permit, either through renewal or modification, if some emission units were shut down or not operational, if emission units were added through Notice to Construct or Notice of Approval, or if there were omissions in the 2020 report. In addition, reported Material Balance information would change depending on new product usage and formula modifications.

3. How is the 2023 ATEI reporting form different from the 2020 reporting form, and can I reuse my 2020 form with updated information?

The difference between the 2023 and 2020 ATEI reporting forms is minimal. On the second and fourth tab (2. Emissions Units & Activities and 4. Material Balance Activities, respectively), there is a new column to identify the emission release type as either a point source or a fugitive source. This information will help DEQ better understand the emitting unit and emission type.

The 2023 reporting form also contains one new tab, '6. MB Summary'. This tab automatically sums all the air toxics from tab 5. Pollutant Emissions – MB by pollutant. This allows DEQ to efficiently report the total emissions to EPA. No additional reporting work is necessary to complete the tab.

Translation or other formats

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It is preferred that facilities use the new reporting form for the 2023 ATEI but not mandatory. Please do not attempt to structurally update or modify either form.

4. Can I request a copy of my reviewed 2020 ATEI Reporting form?

Yes. A designated facility contact may request a copy of their past ATEI form at any time. Please refer to the Program Contacts section at the very end of the FAQ document.

5. How is this three-year 2020 Air Toxics Emissions Inventory different from CAO EI requirements?

This Air Toxics Emissions Inventory is a separate reporting requirement than an EI submitted for a CAO risk assessment on an AQ520 form. While they may contain similar information, they serve separate purposes.

The primary objectives of this recurring three-year ATEI are to provide statewide information that allows DEQ to establish and maintain long-term trends of air toxics emissions in our communities, and to report to EPA the best available information for our state. Subpart 2(a) of OAR 340-245-0040 allows DEQ to periodically request air toxics emissions information statewide, even when sources are not in the CAO program. Refer to the [Air Toxics Reporting Background](#) for more information about the origin of this recurring three-year reporting program.

6. Does this reporting requirement mean that my facility has been called-in to the CAO program to perform a risk assessment?

No, only facilities that have been formally called into the Cleaner Air Oregon program, or have sought a new Simple, Standard or Title V permit since November 2018 are considered CAO facilities and must perform a risk assessment. Visit the For Facilities section of the [Cleaner Air Oregon website](#) for more information about the CAO risk assessment. See FAQ #14 below for CAO facilities.

7. Is reporting mandatory? What happens if I do not submit an inventory for my facility?

For the 2023 reporting cycle, if you own or manage a Title V facility or a Standard or Simple ACDP air quality permitted facility in the State of Oregon, then reporting is mandatory. Failure to provide the requested information is a violation of OAR 340-245-0040(2), for which DEQ may impose a civil penalty and issue an order to comply.

DEQ is not requiring Air Toxics emissions data for the 2023 operating year from Basic and General ACDP permit-holders for this three-year reporting cycle.

8. My facility is located in Lane County; do I still need to comply with DEQ reporting requirements?

Facilities in Lane County have the same 2023 reporting requirements; these facilities will report directly to the [Lane Regional Air Protection Agency](#) instead of the DEQ. Facilities in Lane County should contact LRAPA directly with questions or concerns at 541-736-1056.

9. I already submit a lot of this information in my annual permit reporting requirements. Do I need to do both?

Yes, facilities will need to complete a 2023 Air Toxics Emission Inventory reporting form in addition to any routine reporting requirements in their permit conditions. A standardized form is necessary for DEQ to retrieve the equivalent information from all facilities.

10. Operations at my facility shut down in 2023. Will I still need to report?

It depends on which of the following situations fits the circumstances of the shutdown:

Permanent closure of facility

If your facility permanently closed during 2023 and the air permit is no longer active with DEQ, you do not need to report.

Temporary closure of facility

If your facility operated for any portion of 2023, you will need to report those operations. Facilities with a temporary closure for the full operating year do not need to report.

11. I manage a new facility and we started operation in 2023. Do I need to report?

Yes. You should report all operations and emissions that occurred in 2023. Please contact DEQ for more information if you have questions.

12. Who is responsible for reporting if my business has been sold?

The current Responsible Official listed on the air permit at the time of submission in 2024 is responsible for reporting. Contact your [DEQ permitting office](#) to confirm the contact information for this individual is accurate. Please contact DEQ if you have questions about this reporting requirement.

13. My facility permit is based only on particulate matter and does not release any air toxics. Do I still need to report?

Yes. In some instances, a facility may be permitted for a single operation which emits particulate matter but does not have any calculable emissions of air toxics. These sources should still submit an Air Toxics Emissions Inventory Reporting Form completed with their facility information and include a brief statement in the "Facility Note" tab to indicate why the remaining worksheets are not completed.

14. My facility has been 'called-in' to the Cleaner Air Oregon program. Do I still have to report even if I just submitted an air toxics emissions inventory to that program?

Yes, CAO facilities must report the same as all other air quality permitted facilities for their 2023 operations. This includes existing facilities that have undergone or are currently under CAO review at the time of submission, as well as new facilities that completed the CAO risk assessment process and began operations in or before 2023. For more information, refer to the CAO definition of New and Existing Facility on their [Step-1 FAQ](#) page.

Questions about calculating emissions

15. What do I need prepare for the reporting submittal in 2024?

DEQ recommends taking time to review your permit and permit review report, review your 2020 Air Toxics Emissions Inventory Reporting submittal, ensure that your recordkeeping and monitoring are up to date, and have Safety Data Sheets for any air toxics- containing material products you use. Also review available emission factors for permitted activities, control efficiencies for any air pollution control devices and assemble available air toxics source test data in advance.

16. The ATEI reporting form includes formulas for estimating emissions that are different from my permit. Which should I use?

The ATEI reporting form includes default formulas for calculating estimated emissions; however, these may not be appropriate for all facilities. In some cases, the facility permit will dictate how emissions should be calculated for a specific emission unit or activity. If this is the case, a facility should use the permitted method for estimating emissions and include the final emissions in the appropriate column. Facilities need to indicate these instances in the References/Notes column, or within a cover letter submitted with the reporting form (see Question #39 below in the Submission FAQ).

Keep in mind that 'total VOC' or 'Combined HAP' emissions are not sufficient for the ATEI, and that individual VOC and HAP pollutants will need to be calculated separately. In these cases, permit calculation methods for total VOC or Combined HAP should not be included to avoid redundancy with the individual calculations.

17. Which Emissions Units do I include in my Emissions Inventory?

All Emissions Units (EUs) included in the facility operating permit must be included in the emissions inventory as EUs unless they are *known* to not emit any air toxic contaminants listed in [OAR 340-247-8010](#) Table 1. EUs included in the ATEI must be designated in the same manner as they are designated in the operating permit, where possible.

In addition, any unpermitted EUs that do not meet the categorically insignificant criteria addressed in the question below but have the potential for air toxics emissions should also be included. Such units may be mentioned in the Permit Review Report but do not have an EU ID in the permit.

18. Are the Categorically Insignificant Activities to exclude for this program the same as for my permit?

It depends. Facilities compiling their 2023 ATEI reporting information may be able to exclude some kinds of operations if they are considered a 'categorically insignificant activity' [OAR 340-200-0020(24)]; however, under CAO, the list of insignificant activities is further narrowed [OAR 340-245-0060(3)]. Therefore, facilities should check both lists for confirmation. See FAQ #25 regarding Emergency generators.

19. I need help quantifying emissions for my facility. Where do I begin?

Emission estimates should be based on actual 2023 calendar year production and fuel and/or material usage rates. The following list is a presumptive hierarchy of the types of information that best approximate actual emissions, but each individual case may be different:

- i. Existing air toxic emission factors in current permit or emission detail sheet
- ii. Source test data
Use all site-specific source test data whenever available, even if it is only one test, provided that it is representative of the process during the time period under consideration. If there is only one test, that test result (that is, the average of the three test runs) should be used for the emission factor. If there is more than one test, the average of all the test results should be used. No correction, cushion (e.g., 20%), or standard deviation should be added to the emission factor.
- iii. Source test data from similar equipment
If representative source-specific data cannot be obtained, emissions information from equipment vendors, particularly emission performance guarantees or actual test data from similar equipment is

typically a better source of information for permitting decisions than AP-42, trade or technical association data, or DEQ or other regulatory agency emission factors.

- iv. Trade or technical association data
If no emissions information from equipment vendors or actual test data from similar equipment is available, emission factors from trade or technical association data should be used.
- v. DEQ emission factors, including the Emission Factor Search Tools
- vi. Compilation of Air Pollutant Emission Factors (AP-42), or other state emission factors (e.g., California AQMD or Washington State Ecology emission factors)
If emission factors are available from AP-42, trade or technical association data or DEQ, the source should propose whichever they believe is most representative of their process. If a range of emission factors is provided, use the average of the range.
- vii. Engineering judgment based on sound assumptions about the source type, industry, or site- specific conditions.

20. Will DEQ provide any emissions factor information or tools?

Yes. DEQ created Emissions Factors Search Tools to provide CAO-approved sets of emissions factors for commonly used equipment, and more tools are in development. The emissions factors are available by unit type and are ready to copy/paste into the reporting form. Carefully follow the instructions on the ATEI Reporting form and the EF tool forms and contact DEQ if there are remaining questions.

[Combustion Activities EF Search Tool](#): This tool provides CAO-approved sets of emissions factors for a variety of fossil-fuel burning combustion equipment. Biomass and hogged-fuel equipment are not covered.

[Welding Activities EF Search Tool](#): This tool provides emissions factors from AP-42 for various types of welding rod and welding wire. The user will need to know their specific rod or wire type to use the tool.

21. Where can I find emissions factor information?

DEQ does not currently have a complete database of approved emission factors other than the CAO-approved Search Tools, above. Below are a number of links to EPA and other state agencies' resources that may be useful in establishing emission factors for activities at your facility.

USEPA Resources:

- [AP-42](#)
- [WebFIRE](#)

Other Resources:

- [California Air Resources Board Emission Inventory Resources](#) (CARB)
- [Air Pollution Control District County of San Diego: Calculation Procedures](#) (California)
- [Santa Barbara Air Pollution Control District: Air Toxics for Business](#) (California)
- [South Coast Air Quality Management District](#) (California)
- [Washington Clean Air Agencies](#) (Department of Ecology)

22. Can I use other emissions factor sources, and why does DEQ need the reference information?

Yes, facilities are encouraged to seek out emission factors that best represent their emission units and operations. DEQ requires reference information for each emission factor to confirm that the selections are appropriate.

23. How do I calculate emissions by Material Balance?

The [Material Balance Quick Guide](#) provides step-by-step instructions for performing Material Balance calculations, including how to complete tabs 4 and 5 on the ATEI reporting form.

24. What are Safety Data Sheets?

Safety Data Sheets, Material Safety Data Sheets, and Technical Data Sheets (collectively we refer to these as 'SDS') are standardized documents that contain occupational health and safety data for a particular chemical product. These sheets are prepared by chemical manufacturers and describe the chemical composition and properties of the product. DEQ may request your SDS information upon submittal.

The [Material Balance Quick Guide](#) describes how to locate the relevant information for this request.

Questions about specific emitting units and toxic air contaminants

25. My facility has one or many emergency generators. Do they need to be included in the inventory?

CAO, and therefore the ATEI, requires reporting of all on-site emergency generators, regardless of size or total horsepower. In accordance with federal regulations, sources are limited to 100 hours per generator per year as the maximum non-emergency operations. In the Emission Unit description, provide the generator size (in hp or kW), and only include non-emergency fuel usage for activity. See FAQ #26 for more information.

26. CAO recommends that sources use specific emissions factors for diesel generators. Does that apply to this inventory, too?

While this air toxics emissions reporting effort allows emissions factors from any resource, provided they accurately reflect operations at your facility, the use of the CAO emission factors for Tier 0 &1 or Tiers 2, 3 & 4 diesel generators is highly encouraged. These are provided in the DEQ [Combustion Emissions Factors Tool](#).

Note that CAO recommends that the facility provide the manufacturer recommended emission factor for diesel particulate matter (DPM), when available. Following the hierarchy presented in FAQ #19 above, facilities are encouraged to follow this strategy and use the Emissions Factor Search Tool for DPM emission factor only when other options are not available. More explanation about these units can be found on the Cleaner Air Oregon webpage, [CAO FAQ for Step 2](#).

It is not necessary to calculate 'black puff' or start-up emissions from emergency generators for the purpose of the ATEI reporting.

27. Are TACs and VOCs the same, are they interchangeable?

No, while many TACs are also VOCs, and vice versa, they are not the same and not interchangeable. Refer to the TAC/HAP/VOC Fact Sheet for more information.

28. My facility uses amorphous silica, but the CAS number is the same as respirable crystalline silica.

Does this mean I should consider all amorphous silica as toxic?

No, however there may be a portion that should still be considered. Amorphous silica is not considered an air toxic, despite the fact that it shares a CAS with 'Silica, crystalline (respirable)', CAS# 7631-86-9, which is on DEQ's Pollutant List. It is not necessary to list 100% amorphous silica, but any crystalline 'impurity' (per SDS or other testing) should be listed. This could be accomplished in Material Balance by entering either the respirable portion by % weight, e.g. 5%, or by only claiming the weight of the usage that might be respirable.

29. How should I list hexavalent Chromium (VI) compounds that aren't on the Pollutant List?

Chromium (VI)-containing compounds are important to report with as much specificity as possible. In instances where Chromium (VI) is part of a pigment complex (e.g., strontium chromate, cadmium chromate, ammonium dichromate, etc. and does not appear exactly on the DEQ Pollutant List), the compound and its respective CAS should be listed in the reporting form as they appear on the SDS. For these compounds, DEQ will consider the molecular weight ratio of the Chromium (VI) ion in the overall pigment complex – and knowledge of the specific pigment is necessary for us to do so. See FAQ #34 about how these compounds appear in the reporting form.

It is not necessary to list Chromium (III)-containing pigments, as they are not included on the DEQ Pollutant List.

30. Abrasive Blasting Operations

Blast material usage is considered the amount of blast medium sprayed. Sites that do not recycle should estimate annual usage from purchase and inventory records. Operations that recycle blast medium may spray the same material multiple times. Recycled blast material continues to break down into finer particulates each time it is sprayed. These sites should estimate annual usage from spray rate and hourly operation records.

Minnesota provides a great [emissions calculator for blasting operations](#).

ATEI reporting form technical troubleshooting

31. I accidentally deleted something and now the equations aren't working. How do I fix it?

The ATEI Reporting form uses a handful of embedded formulas to calculate the emissions estimates for both activity information and material balance. If these cells are deleted, so are the formulas. The easiest way to 'refresh' those cells with active formulas is to 'drag and drop' unused rows from lower in the reporting form. While copy/paste will work to replace the formula, the user should be careful that the cell references are correct and as intended. In some circumstances, the 'old' cell references will be pasted into the new row and the formula will become illogical. If the reporting form is causing a problem, please contact DEQ for assistance with the form.

32. How do I add information? I can't insert rows or columns.

The reporting form is partially locked and users are prevented from some actions such as inserting new columns, or inserting rows in the example area (red text). This is necessary to ensure that DEQ gathers equivalent information from all sources. If the reporting form is causing a problem, please contact DEQ for assistance with the form.

33. The 'Comment Instructions' in the row headers get cut-off when I scroll down on my form. How can I view the whole comment box?

For each column of the ATEI reporting form, there are instructions embedded as comments in the header bars. Unfortunately, when the page is scrolled down, these appear to get cut-off. To move the comment box to a location where it is more useful, right click on the cell with the comment, and click on 'Edit Comment' then drag and drop the box to a new location.

34. Why do some pollutant names have a yellow background on Worksheets 3 and 5?

A yellow background indicates that the pollutant name is not recognized on the DEQ Pollutant List. This may be because the name is written or spelled differently or because it is a new compound that is not specifically listed but belongs to a listed pollutant group. To avoid the yellow background for pollutants that are listed, either enter the CAS number for the pollutant and the Pollutant Name column will auto-populate, or copy/paste the CAS and Pollutant Name directly from the DEQ Pollutant List. The yellow background does not indicate an error; it simply helps us identify new compounds.

35. I get an error message in the Calculate Annual Emissions [lb/yr] column on Worksheets 3 and 5. What's wrong?

There are several situations that can cause an error message to appear. First check that the Emission Unit ID matches *exactly* the correct EU in the paired worksheet. The formula is sensitive to capitalization, special characters, and extra spaces (at the end of the EU ID, e.g.). For Worksheet 5, the Emissions Unit ID and Material Name must both match. If the error message persists, confirm that the formula is referencing the intended cells. If information is copy/pasted from other parts of the form, it is possible that the old cell references are maintained by mistake. If in doubt, you can always erase the formula and write in the desired equation using the formulas described in the Instruction tab or 'drag and drop' to replace the formula, as described in FAQ #31, above.

36. DEQ has released a more recent form version since the one I downloaded and completed. Do I need to start over with the new form?

No. DEQ periodically releases new versions to clarify reporting issues based on feedback from sources. It is not necessary to update an already completed submission. Please contact DEQ if you have concerns or questions about the reporting form.

Questions about submitting the air toxics emissions inventory

37. How do I submit my completed ATEI reporting form to DEQ?

DEQ has created the [Air Quality Document Upload Application](#), an online portal for facilities to submit certain documents to DEQ. This application provides a centralized place for facilities to submit electronic copies of their ATEI reporting form as well as other documents like annual reports and semi-annual reports.

Email aqDocumentUpload@deq.oregon.gov with questions about the facility email contact and PIN. Confirm your facility's contact information is up to date with your [DEQ permitting office](#).

38. What documents should I submit with my Air Toxics Emissions Inventory?

Facilities are encouraged to include all their relevant emissions information in the ATEI Reporting form by utilizing the 'Facility Note' space and the References/ Notes spaces on Worksheets 3 and 5. The AQ

Document Upload Application will accept Excel spreadsheets (.xls and .xlsx) and pdf documents. The application will *not* accept zipped files. Facilities are asked *not* to submit Safety Data Sheet copies for their material usage unless specifically requested by DEQ as a follow-up inquiry. The 2023 ATEI form must be submitted as an Excel spreadsheet.

39. Can I attach a cover letter with my ATEI submission?

Space is provided in the 'Facility Note' tab of the ATEI reporting form if you want to include a cover letter or additional notes with your ATEI submission. Please copy/paste the letter into a text box in this space (the window can be expanded as needed).

40. My facility has confidential business information or information exempt from disclosure. What should I do?

If a facility believes any information provided for this request should be exempt from disclosure, they must read and follow the process outlined in OAR 340-214-0130. It should be noted that emissions data is not considered confidential or trade secret and therefore cannot be exempt. All information that a facility claims as CBI should be identified clearly in the file name and on each spreadsheet page. A written request for review, meeting the conditions outlined in OAR 340-214-0130, must accompany the submission or be provided to DEQ in advance. Facilities planning to request CBI are encouraged to communicate directly with DEQ and submit the CBI-containing reporting form directly to a DEQ staff person via email.

Questions about DEQ's review of air toxics emissions inventory reports

41. Will DEQ change or add anything to my ATEI submission?

In our review, DEQ may find it necessary to align misplaced information in the facility's submission, including refreshing the formulas or codes so they can be imported into our database. In some cases, DEQ may add combustion emissions using the Combustion Emission Factor Search Tool and Annual Report data if emission units and emissions were improperly omitted from the reporting form. In most instances where emissions calculations are affected, DEQ will contact the facility owner or operator. Contact DEQ if you have questions.

42. Will I be able to access my facility's submitted ATEI report if I have questions in the future?

Yes. A registered facility contact will be able to request a copy of their reviewed ATEI. Contact DEQ for assistance.

43. Will DEQ make the emissions data publicly available?

DEQ publishes a summary emissions report for each facility. This report includes facility-wide emissions totals per pollutant. The reports can be accessed through the [Air Quality Permit Data Search](#) page.

Program contacts

For questions about the 2023 Air Toxics Emissions Inventory reporting, contact Clara Funk at Clara.FUNK@deq.oregon.gov or David Broderick David.Broderick@deq.oregon.gov. For all other permitting questions, contact your regional [DEQ permitting office](#).

For LRAPA facilities, please contact LRAPA directly at 541-736-1056.

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit DEQ's [Civil Rights and Environmental Justice page](#).