

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

TO: Title V Facility Contacts and Responsible Officials

FROM: Hannah Ashenafi, P.E.
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Air Quality Division

SUBJECT: DOEE Implementation of Combined Emission Reporting System (CAERS) and Annual Compliance Certification Schedule

DATE: February 22, 2021

Beginning for reporting year 2020, DOEE will begin onboarding Title V facilities onto EPA's Combined Emissions Air Reporting System (CAERS) for annual reporting of emissions. All Title V facility contacts and responsible officials were notified of this update by email on January 27, 2021. This memorandum provides additional information and updates regarding DOEE's implementation of CAERS and compliance schedule for CY2020 reporting.

CAERS Background

EPA's Combined Emissions Air Reporting System (CAERS) for annual reporting of emissions for Title V facilities. This tool will improve data quality, accessibility, and usability of air emissions data and reduce industry burden for point source reporting. For more background information on the CAERS project, see EPA's website here: <https://www.epa.gov/e-enterprise/e-enterprise-combined-air-emissions-reporting-caer>.

CAERS was first implemented by Georgia DNR in 2020 for CY2019. DOEE will become one of the first jurisdictions to move onto this new platform, which is still undergoing development and testing, and therefore will require some flexibility in onboarding to the system for CY2020. DOEE is excited to move towards online reporting as our preferred method of submittal for annual emissions, while offering facilities a more streamlined method for reporting going forward.

Facilities should note that submittal of emissions through CAERS is **not** intended to be a substitute for Annual Compliance Certification reports, which are due to DOEE annually on March 1st for all Title V facilities in the District. Submittal through CAERS will only be used to replace hard copy submittal of annual emissions to DOEE, which are typically included as an attachment to Annual Compliance Certification reports.

Implementation of CAERS

DOEE will begin onboarding onto CAERS for CY2020. DOEE strongly encourages all Title V facilities to participate in the onboarding process for CY2020, as DOEE is moving towards electronic reporting as the preferred method for submittal of emissions in the future.

Submittal through the CAERS online system requires each facility to **designate a submitter and**

a certifier. For all Title V facilities, DOEE will require the **Responsible Official** for the facility, as designated by the Title V permit, to be the certifier for the facility's emissions in CAERS. The submitter may be any individual authorized by the facility.

The CAERS online system is expected to become live for reporting on **March 8, 2021**. EPA will also be offering various trainings, as well as providing virtual office hours to support facilities in using the CAERS platform. Facilities will receive additional information about the training opportunities as they become available.

Annual Certification Reports for all facilities will continue to be due electronically to DOEE on March 1, 2021. However, DOEE will allow facilities an option to submit emissions through the CAERS reporting system only for CY2020. **For facilities that choose to submit annual emissions through CAERS only, the deadline for CAERS submittal will be May 1, 2021. Facilities must also notify DOEE by March 1, 2021 of their intention to submit through CAERS** by email to air.quality@dc.gov. This notification email must include:

- **Name of the submitter and certifier (Responsible Official)** that will be performing the submittal in CAERS
- **Estimate of 2020 annual emissions** (for fee billing purposes)

DOEE will send out all emissions fee bills to facilities by May 1, 2021. For facilities submitting through CAERS, estimated emissions will be used to calculate fees. If actual emissions reported through CAERS place the facility in a different emission fee category, DOEE will begin to make adjustments to fee bills after May 1st.

Compliance Schedule for CY2020

- **March 1st:** Annual Certification Reports are due electronically to DOEE. For facilities that choose to report emissions through CAERS only, email notification of intention to submit through CAERS (as specified above) is due to DOEE. Please submit by email to air.quality@dc.gov.
- **April 1st:** Hard copy Annual Certification Reports are due to DOEE by mail. Hand delivery will not be accepted.
- **May 1st:** CAERS submittal deadline for facilities that choose to report annual emissions through CAERS only. Facilities should also expect to receive fee bills by May 1st.

CAERS Training Schedule

- **February 9th:** Initial CAERS training hosted by EPA.
- **March – April:** Various additional CAERS trainings
 - CAERS User Interface Training for Facility Preparers - March 24, 1-3 pm ET
 - CAERS Bulk Upload Training for Facility Preparers - March 31, 1-3 pm ET
 - CAERS Controls and Control Path Training for Facility Preparers - April 14, 1-3 pm ET

EPA will also host CAERS office hours beginning in March, with dates TBA.

For any questions about DOEE's implementation of CAERS, please contact air.quality@dc.gov.