# Air Reporting 101

## Louisiana AWMA Fall Conference 2026

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# The One Idea to Walk Out With

YOUR PERMIT

## is the promise

Permitting happens when something changes or is renewed.

YOUR REPORTS

## are the receipts

Reporting happens every year, for the life of the facility.

*Reporting is your compliance story. It goes better when it's…*

**Accurate** | **Consistent** | **Timely**

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# Who This Talk Is For

- Early-career professionals
- Consultants and industry staff
- Anyone handed a report “due in three weeks”
- Louisiana focus — LDEQ | LSP | EPA

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# Five Questions for Every Report

*Understand why — not just what.*

1. What is this?
2. Why does it exist?
3. What does the agency do with it?
4. Where does my information come from?
5. What could go wrong?

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# Three Agencies, Three Questions

## LDEQ

*What did you emit? Did you comply?*

**ERIC, SAMs**

## EPA

*Oversees the state — and collects some reports*

**ACC,TRI, NSPS/NESHAP**

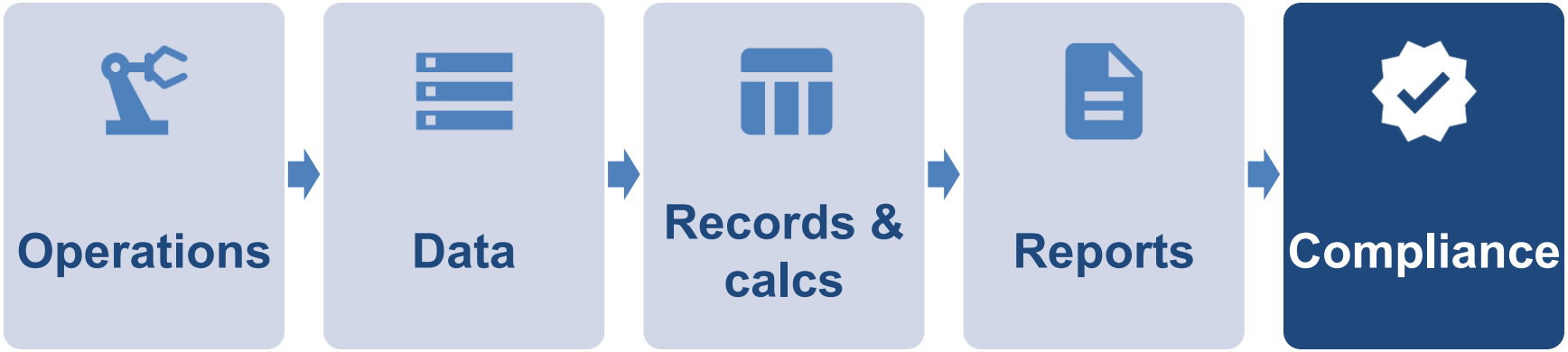
## State Police

*What chemicals are behind your gate?*

**Tier II**

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# Reports Retrieve, They Do Not Create




*You can't gather in March what nobody wrote down in September.*

**Stay engaged all year**

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# Annual Emissions Inventory (ERIC)

| AGENCY | DUE | RULE |
| --- | --- | --- |
| LDEQ | April 30 | LAC 33:III.919 |

## Actual emissions — not permitted emissions

### LDEQ uses it for:



National inventory



Air quality modeling



Public record



State plans (SIPs)

# ERIC: Where the Numbers Come From

**Permit + application**

**Operating data**

**Methodology**

**Emissions**

## Every year: what changed?

- Equipment changed?
- Permit modified?
- Controls changed?
- Tank service changed?
- Variance issued?

# ERIC: Reconcile Before You Submit

## Compare against:

**Permit limits** | **Monitoring data** | **Last year**

**Doesn't reconcile?**

**Calculation or data error**
Reporting problem → fix it

**Actual exceedance**
Compliance problem → handled differently

# ERIC: What Catches People

DUE
**April 30**

## Permitted, not built?

You still file, showing zero emissions

## Submit early

Let the portal find the errors first

## Check the guidance

Every year, plus LDEQ's annual ERIC training

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# Semi-Annual Monitoring (SAMs)

| AGENCY | DUE | RULE |
| --- | --- | --- |
| LDEQ | Mar 31 · Sep 30 | 40 CFR 70.6<br>LAC 33:III.535.K |

## Report all deviations at least every 6 months

LDEQ standard forms required for SAMs and ACCs

**Title V didn't create new limits, but rather accountability.**

# SAMs Aren't Your Only Clock



**Unauthorized discharge**

Call right away



**Deviation report**

Promptly, per permit



**Semi-annual report**

Every 6 months

**A phone call today can't wait for the SAM.**

# Build the SAM From the Permit

**Not by opening last period's report and changing the dates.**

### 1 Build a permit matrix

Every specific condition: what to monitor, how often, what to record, and what triggers a report.

### 2 Pull the records

Logs, CEMS availability, inspection sheets, parametric monitoring data.

### 3 Talk to the unit

Operators and engineers know about the week the analyzer was down. Connect it to the permit.

**ILLUSTRATIVE PERMIT MATRIX — build yours from your permit. Unsure what a condition requires? Ask LDEQ.**

| Condition | What to monitor | How often | What to record | What triggers a report |
|---|---|---|---|---|
| Flare | Pilot flame present | Continuous | Pilot monitor data | Pilot out; monitor down |
| Scrubber | Liquid flow rate | Daily | Operator log | Below minimum; missed reading |

# Where SAMs Go Wrong

## Top mistakes

- “No deviations” despite monitoring gaps
- Missed monitoring treated as a non-event
- Asking “any problems?” instead of checking records

## Write it up

**What happened**

**When & how long**

**Cause, if confirmed**

**What was done**

**Accurate, not dramatic.**

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# Compliance Certification (ACC)

| SUBMIT TO | DUE | CERTIFIED BY |
| --- | --- | --- |
| EPA + LDEQ | March 31 | Responsible Official |

**Every condition: compliant? Continuous or intermittent?**

# ACC: Someone Certifies This

THE RESPONSIBLE OFFICIAL CERTIFIES THAT…

*"Based on information and belief formed after reasonable inquiry, the statements are true, accurate, and complete."*

Paraphrasing 40 CFR 70.5(d)

**A knowingly false certification is a criminal matter — not a paperwork matter.**

**You're building the reasonable inquiry that a real person puts their name on.**

## Before it goes up for certification

- Does it reflect every deviation you reported in your SAMs?
- Is compliance characterized correctly — continuous vs. intermittent?
- If someone asks two years from now how you reached a conclusion, can you show them?

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# Tier II Chemical Inventory

| AGENCY | DUE | LAW |
| --- | --- | --- |
| State Police | March 1 | EPCRA 311–312 |

## Hazardous chemicals on site last year

### Goes to:



State (LSP)



LEPC



Local fire department

# Tier II: Louisiana Is Stricter

| | Federal | Louisiana |
|---|---|---|
| Hazardous chemicals | 10,000 lb | 500 lb |
| EHSs | 500 lb or TPQ | 500 lb or TPQ |



**Many Louisiana sites file that never would federally.**

# Tier II: Proposed Change

**PROPOSED (non-EHS)**

**500 lb ➡ 10,000 lb**

EHSs unchanged

- **Proposed**
- **Comments closed Oct. 10**
- Final rule: pending
- No effective date yet

**Until it's final, 500 lb still applies.**

Check status before you file.

# Tier II Is for Responders



**Not an emissions program.**

**A scouting report for emergency responders.**

*Last year's data, so they can plan before the call.*

## Inventories change quietly

- *Turnaround solvents*
- *Contractor totes*
- **Year-round with ops & safety**
- **Walk the site**

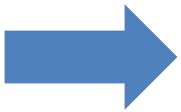
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# Tier II Moves to Hazconnect

OLD

**LSP Tier II site**

*Retiring*



NEW

**Hazconnect**

RY2026 · due Mar 1, 2027

## All in one place:

**Account**

**Report**

**Fee**

# Hazconnect: What to Do Now

1. **Register now — not in February**
   Email verification + LSP approval take time

2. **Filed before? Don't "Add a New Facility"**
   Unsure? Email the Right-to-Know Unit first

3. **Do your homework now**
   LSP's user's guide and training video walk you through it

# Toxics Release Inventory (TRI)

| AGENCY | DUE | PORTAL |
|---|---|---|
| EPA | July 1 | TRI-MEweb |

## Applies if all three are true:

Covered industry (NAICS) + 10+ full-time employees + Over a chemical threshold

25,000 lb mfd/processed
10,000 lb otherwise used

PBTs: 10 or 100 lb
Dioxins: 0.1 gram

# TRI Is Built for the Public

**1984** — **Bhopal, India**

**1985** — **Institute, WV**

**1986** — **EPCRA passed**

## Who reads TRI?

- **Journalists**
- **Advocates**
- **Neighbors**
- **Permit hearings**

# TRI vs. Emissions Inventory

| | ERIC | TRI |
|---|---|---|
| **Media** | Air | Air, water, land + transfers |
| **Organized by** | Source | Chemical |
| **Units** | Tons and pounds | Pounds |

**Same data → same number**

**Different method → explain**

# What About GHG Reporting?

**RY2025 DUE**

**March 10**

**2027 — for now**



## Date keeps moving

Extended twice in 2026

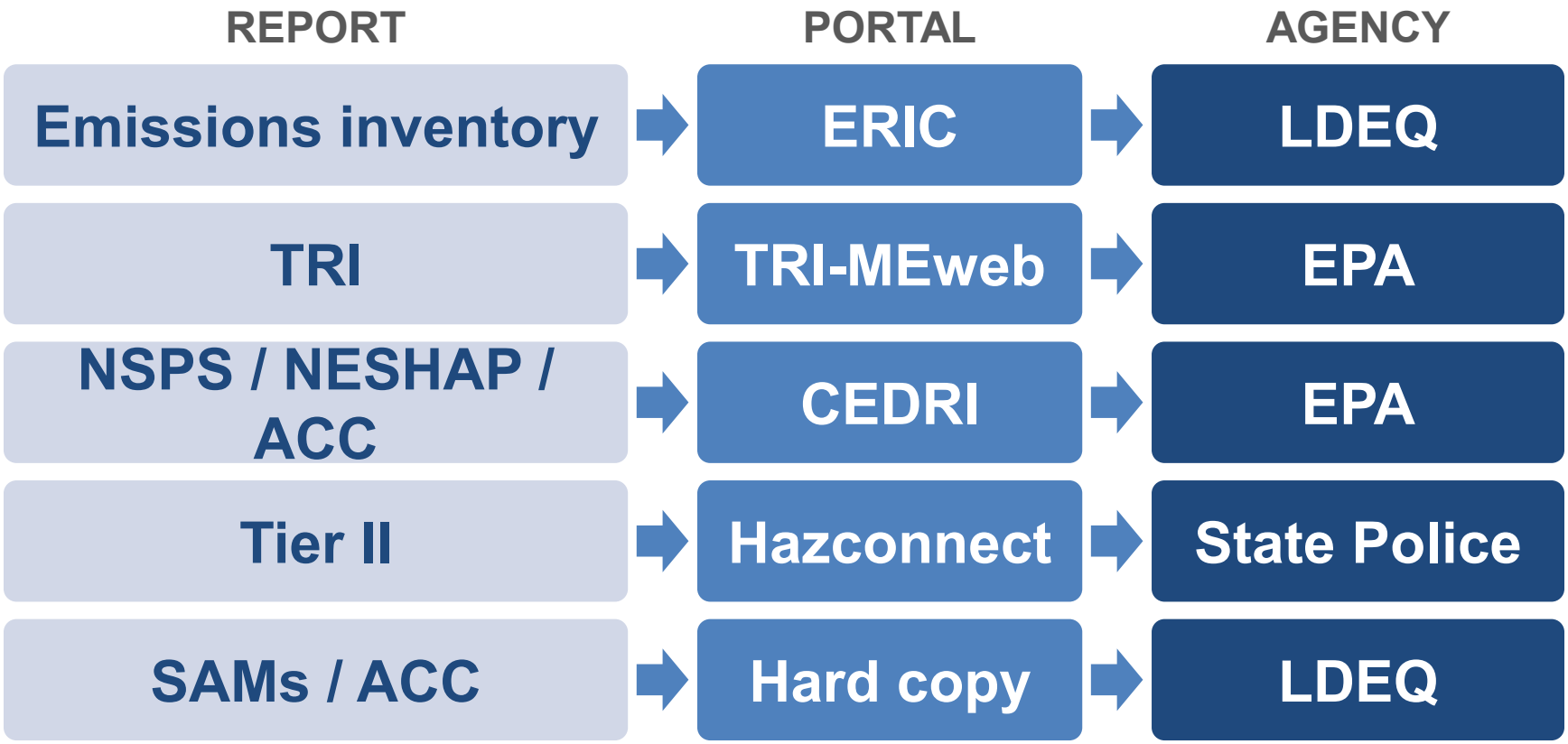


## Who has to report?

Still being “discussed” at EPA

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# Online Reporting Portals




**Submitting is a technical act — and technical acts fail.**

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# Account Access Is Problem #1

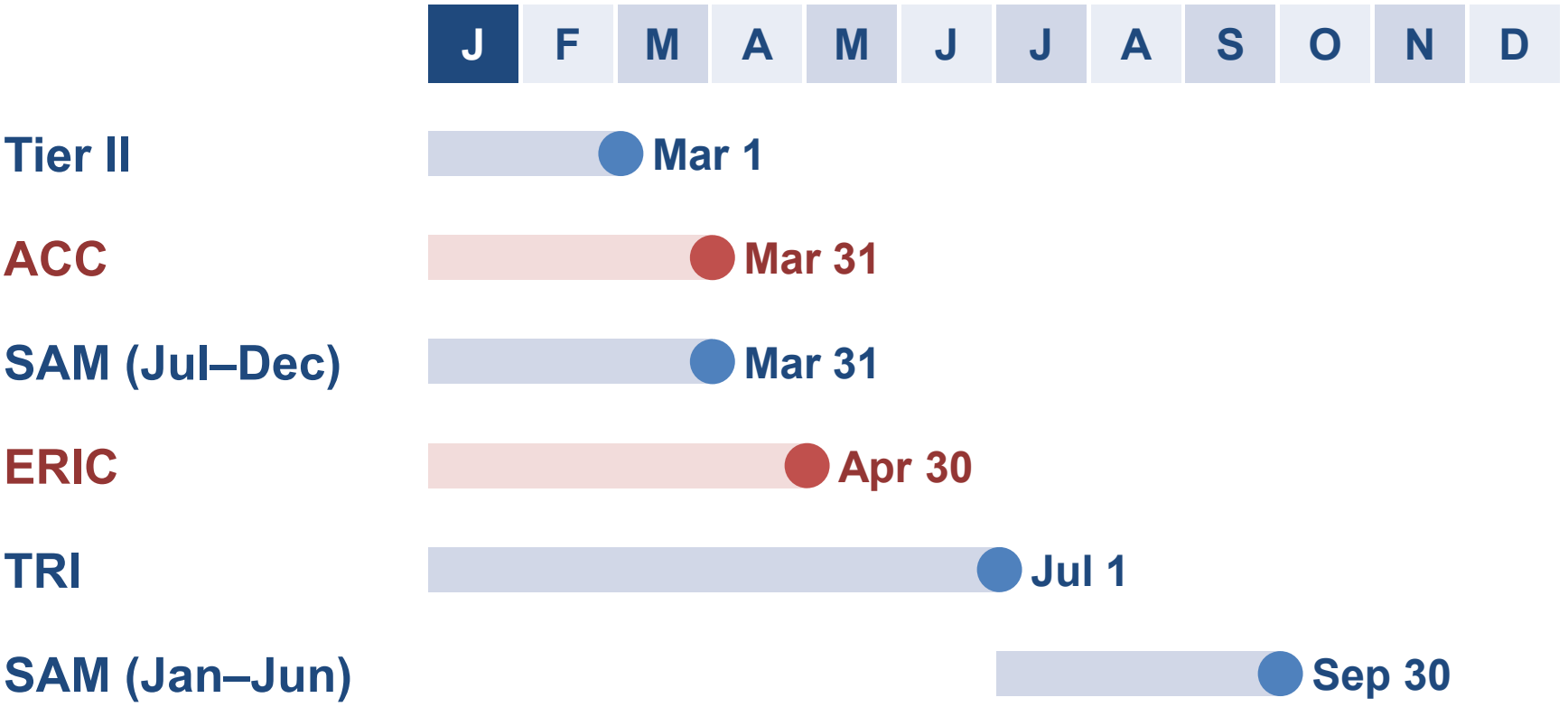
| May | June 29 | July 1 |
| --- | --- | --- |
| Certifier retires | Someone notices | TRI due |

## Every January:

- Verify accounts
- Certifier can log in
- Facility IDs correct
- Save every receipt

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# Running the Reporting Season




**ACC is due before ERIC — the numbers must match.**

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# Build the Calendar in January

**For every obligation, write down:**

| | | | | |
|---|---|---|---|---|
| **WHAT** | Due date | Rule | Data needed | |
| **WHO** | Provides | Prepares | Reviews | Certifies |

***Real names — not "somebody in operations."***

**Then work backwards:**

**Ask** → **Ops pulls data** → **Prepare + QA** → **Due Mar 1**

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# Habits for Reporting Season

- Last year's report = a checklist, not an answer key
- One organized data request
- Real QA/QC: units, double-counting, a 2nd reviewer
- Document assumptions as you go
- Keep the record after you submit

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# Ask the Better Question

Not: *"What do I need to submit?"*

**Ask instead:**

**"What could prevent me from confidently submitting this?"**

**Ask in January**
You have options

**Ask the week it's due**
A bad week, maybe a bigger problem

**The timing is the whole thing.**

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# Keep the Framework

1. What is this?
2. Why does it exist?
3. What does the agency do with it?
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*Compliance you can't document is just a rumor.*

**Thank you!**

**Questions (and reporting horror stories) welcome**

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