

# FREQUENTLY ASKED QUESTIONS (FAQ)

# **Contents:**

MAERS LOG-IN AND REGISTRATION	1
SOURCE FORM	2
STACK FORM	3
EMISSION UNIT FORM	3
REPORTING GROUP FORM	5
ACTIVITY AND EMISSIONS FORM	5
SUBMITTING THE MAERS REPORT	6
OTHER	6
REPORTING THRESHOLDS	7
HELPFUL LINKS	8
CONTACTS	8

# MAERS Log-in and Registration

## 1. How do I register in MAERS?

From the MAERS homepage (<u>www.egle.state.mi.us/maersfacility</u>) click on "Self-Registration." <u>Instructions for self-registration are located at Michigan.gov/MAERS</u>. .

#### 2. I registered in MAERS last year. Do I need to register again?

If you are with the same company, once you are registered in MAERS you do not need to register again.

If you change companies, you DO need to register again under the new company. Please send an e-mail to infomaers@michigan.gov to request your old MAERs account be made inactive.

# 3. How do I change our facility's primary preparer?

If the person that would like to be the new primary preparer is NOT already registered in MAERS under a different role, they should go to "Self-Registration" and register as a primary preparer. The new primary preparer will need to mail in the signature agreement form. When the Air Quality Division (AQD) receives the form, they may contact the primary preparer to verify the change.

If the person that would like to be the new primary preparer is already registered in MAERS under a different Role (e.g. secondary preparer), then see question 5.

# 4. I changed companies can I use my existing MAERS account?

No. Please register for an account with the new company and send an e-mail to <a href="mailto:lnfoMAERS@Michigan.gov">lnfoMAERS@Michigan.gov</a> to make your old MAERs account inactive.

800-662-9278 <u>Michigan.gov/EGLE</u> Rev. 1/2020

5. How do I change my Role in MAERS (e.g. I was previously registered as a secondary preparer but now would like to be a primary preparer)?

If you would like to change your role to primary preparer, please complete the PDF version of the <u>electronic</u> <u>signature agreement form</u>. Include a note to identify the previous primary preparer that you are replacing.

If you are currently a primary preparer and would like to change your role to a different type of preparer (e.g., secondary preparer, consultant), then send a note to <a href="mailto:lnfoMAERS@Michigan.gov">lnfoMAERS@Michigan.gov</a>. Please indicate the new role you would like to take on. If you know who the new primary preparer will be, include their name and e-mail address.

- 6. I registered as a primary preparer, but cannot log in using the password that was sent to me. What do I do? You will not be granted access to your account until the AQD receives and approves your e-signature agreement form. You should receive an e-mail from the AQD within 48 hours of submitting your form; this email will indicate when you will have access.
- 7. I am registered as a primary preparer, and have logged into my account but do not see my facility's MAERS report, why?

If you are logging in prior to January 15 the MAERS Report may not have been posted yet. Check back later.

If you are logging in after January 15, send an e-mail to InfoMAERS@Michigan.gov.

8. I am registered as a secondary preparer but cannot access a MAERS Report under the MAERS Report tab.

If you are logging in prior to January 15 the MAERS report may not have been posted yet. Check back later.

If you are logging in after January 15, then it may be because the primary preparer for the facility has not yet associated you with the source. Contact the primary preparer for the source. <a href="Instructions">Instructions</a> are available at Michigan.gov/MAERS.

9. I forgot my username and/or password. How do I find it?

If you forgot your password, but know your user name, go to the <u>MAERS Sign-In page</u> and click on "Forgot Password." You will need to enter your username and e-mail address. A new password will be sent to you via e-mail. If you cannot remember your username or the e-mail address under which you registered, send an e-mail to <u>InfoMAERS@michigan.gov</u> or call 800-662-9278.

10. I changed my password, but it doesn't work when I use it to log into MAERS.

Users can change their password in MAERS under the "My Account" tab. When you do this an e-mail will be sent to you indicating that your password has been changed. However, if you try to log on immediately after changing your password, you will not be able to because the system server has not yet updated. Log out and then try again. If it still does not work then, send an e-mail to <a href="mailto:InfoMAERS@Michigan.gov">InfoMAERS@Michigan.gov</a>. In the meantime, you should still be able to log in using your old password.

# **Source Form**

11. How do I determine the location coordinates for my facility if it covers a large area?

The location coordinates provided must be within the facility boundaries. There are no requirements as to where the reading must be taken. However, it is probably best to give the coordinates as close to the center of the facility as possible.

**12**. Where can I find the proper North American Industrial Classification System (NAICS) code for my facility? Access the NAICS lookup utility by clicking on the magnifying glass next to the NAICS field. Follow the steps to identify your sources NAICS Code or click on this link – NAICS code search.

# 13. Why have location coordinates changed to latitude and longitude measurements in decimal degrees? What are the collection method fields?

These changes have been made to make MAERS more compatible with U.S. EPA reporting requirements. For existing sources, locations have been converted from UTMs to decimal degrees, but the data collection methods must be provided. These fields provide some assurance regarding the source of the location coordinates.

#### 14. The Latitude and Longitude are grayed out and cannot be changed.

If the Latitude and Longitude fields are grayed out, this means that district staff have verified the coordinates. If you feel the coordinates are incorrect, please send the correct coordinates to <a href="mailto:lnfoMAERS@Michigan.gov">lnfoMAERS@Michigan.gov</a> and request the coordinates be changed.

# **Stack Form**

## 15. If I do not report a stack, do I still need to report the emissions coming from the stack?

Yes, assuming the emissions come from a reportable emission unit. Emissions are reported at the emission unit level and not the stack level. If you do not report a stack because emissions fall below the stack reporting thresholds (identified in the SV-101 Stack Form Instructions & Examples or MAERS User Guide), you still have to account for those emissions. Therefore, even though you do not report a stack, you do report the emission unit that is connected to the stack and all associated emissions.

**Note:** It is highly recommended that facilities subject to the ROP program report all stacks with applicable requirements. Stacks with applicable requirements must be reported in the ROP renewal application. If these stacks are reported in the MAERS, you will not have to include the stack information with your ROP renewal application.

# **Emission Unit Form**

## 16. What emission units must be included in MAERS?

Facilities NOT subject to the ROP program should include any emission unit:

- Included in a permit to install (PTI) including opt-out permits;
- Grand-fathered; or
- Not excluded from exemption per Rule 278, exempt under Rule 280-291 and listed in the Rule 201 exemption list.

ROP subject facilities should include any emission unit that:

- Is included in the ROP;
- Meets the criteria for non-ROP sources (above); or
- Emits greater than 10% of any of the significant levels listed in Rule 119(e).

Refer to page 24 of the MAERS User Guide. The guide can be accessed at Michigan.gov/MAERS.

17. My facility has a collection of space heaters covered under an opt-out permit. Can the collection of space heaters be reported under one emission unit? These space heaters must be reported in MAERS not because they are found in the Rule 201 Exemption List on the Emissions Unit Instructions but because they are in a permit to install.

Yes. Just fully describe the equipment in the "Operator's Emission Unit Description" field.

# 18. If I have multiple emission units that meet one of the Rule 201 Exemption List criterion on Emissions Unit Instructions, do I have report them individually?

No. In general, if you have several Rule 201 exempt emission units that must be reported in the MAERS, they can be reported together if they have similar rated capacities and all units are subject to an identical state or federal regulation (see exception below). It is acceptable to report multiple pieces of equipment (such as space heaters) as one emission unit. This can only be done if the equipment is listed in the Rule 201 Exemption List on Emissions Unit Instructions, and there is an aggregate throughput threshold for reporting to MAERS. Just fully describe the equipment on the "Operator's Emission Unit Description" field.

**Note**: Emissions from other Rule 201 exempt emission units having common activities may be combined and reported at the Reporting Group level.

Sometimes it may not be a good idea to combine them together. For example, some facilities are tempted to aggregate boilers found in Rule 282(2)(b) into one emission unit. Some of these boilers could be subject to a federal standard (New Source Performance Standard (NSPS) Subpart Dc), and if so, they should be in an individual (separate) emission unit.

19. Rule 285(2)(r)(iv) exempts "cleaning". On the Emissions Unit Instructions, it implies that this refers to cold cleaners. This seems to conflict with the exemption found in Rule 281(2)(h). For example, if I have cold cleaners that have air/vapor interfaces exceeding ten square feet whose total throughput is less than 1,000 gallons per year, do I have to include them in my MAERS Report?

Both Rule 285(2)(r)(iv) and Rule 281(2)(h) exempt cold cleaners. Rule 281(2)(h) only applies to cold cleaners with an air/vapor interface less than ten square feet. Since your cold cleaners have an air/vapor interface greater than ten square feet, they are exempt under Rule 285(2)(r)(iv) and not Rule 281(2)(h). However, as explained in the Emissions Unit Instructions, your cold cleaners would only have to be reported if together they used more than 1,000 gallons of cleaner in a year. Since their total throughput was less than 1,000 gallons, you do not have to include them in your MAERS Report. However, if the cold cleaners are located at a facility subject to the ROP program, emissions from the cold cleaners should be reported (please see previous discussion of ROP reporting requirements).

20. Since we don't have to report toxic emissions, do I need to include my chrome-plating tanks in my MAERS Report?

Emission units, including chrome-plating tanks, must be reported to MAERS in accordance with the answer to the first question in this section. Although you do not have to report toxic emissions, criteria pollutant emissions (such as VOCs and particulate matter) do have to be reported in the MAERS.

21. I'm an ROP facility and I have a grandfathered emission unit below the 10% significant levels in Rule 278, does it need to be included in the MAERS?

A grandfathered emission unit is an emission unit that was installed before August 15, 1967, that is not covered by a permit exemption in Rules 279-291, and that was never modified, reconstructed, or relocated after August 15, 1967. All grandfathered emission units must be included in the MAERS.

If the emission unit was installed prior to August 15, 1967, but is covered by one of the permit exemptions and is not excluded from exemption per Rule 278, then it is not considered a grandfathered emission unit with respect to the MAERS. This emission unit should be included in the MAERS if it meets any of the following: it is located at an ROP subject facility; its emissions exceed 10% of the significant thresholds; or, it is identified in and meets the criteria in the Rule 201 Exemption List found in the Emissions Unit Instructions.

- 22. Are there any changes in the Rule 201 Exemption List (Emission Unit Instructions) from last year?

  Go to Michigan.gov/Air for the latest information on Michigan Air Pollution Control rule changes.
- 23. The only emission unit at our facility is a boiler that is subject to NSPS Subpart Dc. We are required to submit a MAERS Report, but our boiler is Rule 201 exempt and does not have to be included in the MAERS (i.e., it is not listed in the Rule 201 Exemption List found in the Emission Unit Instructions). Which forms do we fill out to complete our MAERS Report?

Complete the Source and Contact Forms.

# **Reporting Group Form**

24. What is the difference between a flexible group and a reporting group?

A flexible group is used in the renewable operating permit (ROP) program to combine two or more emission units that have common or identical requirements.

A reporting group is used in the MAERS to combine two or more emission units with identical activities (SCCs) to simplify reporting emissions for these emission units. Sometimes, but not always, it makes sense to create a reporting group in the MAERS for the emission units comprising a flexible group in the ROP.

25. Can I make a reporting group containing a coating booth with a permit to install and a coating booth that is exempt under Rule 287(2)(c)?

Yes, if both coating lines have the same SCC.

# **Activity and Emissions Form**

26. Many SCC's have a capacity stated in a range. Should I use the equipment's design capacity or my operating rate to select the proper SCC?

Use the design capacity and not the typical operating rate when selecting your SCC.

27. I understand that I should only provide one material description per SCC. If I have a coating line that uses numerous water-based and solvent-based coatings, should I add the gallons of water-based and solvent-based paints together and report the sum for the material throughput and provide the weighted average of these coatings for the VOC content and density on the A-101 form?

No. Since there is an SCC for water-based paints and an SCC for solvent-based paints, report each SCC separately. All the various water-based paints should be totaled and entered for the material throughput. For the VOC content and density fields, enter the weighted average of the water-based paints. Follow the same procedure for the solvent-based paints.

28. If the SCC corresponds to paint manufacturing, do I need to fill out the VOC content and density fields on the Activity Form?

Please provide the VOC content and density information if you have it.

29. When using mass balance to calculate VOC emissions from coating booth, why is it necessary to provide an accurate weighted average of the density and VOC content of the coatings?

An accurate density and VOC content helps the AQD ensure that the reported emissions are accurate. In addition, the Air Quality Division is required to report density and VOC content of coatings to the U.S. EPA.

30. If my emission unit only emits chlorine, do I have to complete an Emissions Form since these are toxic emissions and not particulate matter (PM) or VOCs?

Even though your emission unit only emits chlorine, you must complete an Emissions Form. You are not required to report toxic emissions, so you do not have to report your chlorine emissions. However, you do have to report at least one criteria pollutant. Therefore, you still report either PM or VOC on the Emissions Form and report the emissions as zero.

Currently, reporting of toxic pollutant emissions in the MAERS is voluntary; however, AQD may estimate toxic pollutant emissions for you. For questions regarding the reporting of toxic pollutant emissions, contact your AQD district office.

31. How old can my stack test data be?

More important than the age of the test are the following: results should be from the most recent test; the test must have been conducted in accordance with the U.S. EPA protocols; and the test must have been conducted under conditions which represent current operations. A test which meets these criteria will be acceptable as the basis for reporting to the MAERS.

# Submitting the MAERS Report

# 32. Where can I find my PIN or the answer to the security questions?

This information is not displayed in MAERS. If you forgot your PIN or security questions answers, you can reset them on the "My Account" tab.

#### 33. Why don't I see the submittal authorization tab when I click the "Submit" link?

This is because you are not registered as a Primary Preparer for the source. Only Primary Preparers have the authority to submit the MAERS Report, and they are the only ones that will have access to the "Submittal Authorization" tab.

# 34. Why do I get errors when I run the completeness check before I start working on this year's data?

You will get errors before you start working on the database because some information must be entered for this current year even though it was entered last year. For example, the material throughput on the Activity Form and all Emissions forms have to be completed because the AQD does not carry these values forward from year to year. Also, any new field requirements since the last MAERS submittal (such as the Supplemental Portable form for portable sources) will also need to be addressed.

#### 35. Can I submit data that contains errors?

MAERS will not allow you to submit your data if any required data is missing. These errors will appear in "red" on your browser screen. You can submit your data that is error flagged in "yellow" text even if it has not been corrected. If you submit a MAERS Report with errors that can be fixed, the AQD may send the database back and have you correct these errors.

# **Other**

# 36. If a new owner takes over a facility midway through the reporting year, who should file the MAERS Report and who should pay the fees?

The new owner is responsible for filing the MAERS Report and paying the applicable fees.

## 37. Do I have to report fugitive emissions?

The requirement to report annual emissions includes fugitive and other non-stack emissions, as well as emissions from releases where the emissions are quantifiable. Some examples of specific instances where fugitive emissions must be reported are as follows:

The source operates an emission unit with a permit or emission standard which regulates fugitive emissions.

The source is listed in a specific source category identified as having fugitive emissions under the definition of potential to emit (Rule 116(m)).\*

The source reports fugitive emissions to the Toxic Release Inventory.\*

Further information on fugitive emissions may be obtained from the following U.S. EPA websites:

Search by Emission Type: <a href="https://www3.epa.gov/ttnchie1/le/">www3.epa.gov/ttnchie1/le/</a>

Search by Source Category: <a href="https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors">www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors</a>

To identify processes with fugitive emissions, select a document of interest on these websites. Select "find" while using the term "fugitive" for the specific emission type or source category. Fugitive, non-stack, and release emissions must be considered when determining if a company is required to report emissions as specified in AQD-013 Policy and Procedure.\*\* These emissions must also be included when determining whether to report emissions from exempt processes or process equipment under Rule 212(7).

The AQD may require reporting of a specific air contaminant if such reporting is considered by EGLE as necessary (and is specifically requested by EGLE) for the proper management of the air resources (Rule 2).

\*For exempt processes referenced in Rule 212(7), reporting is required if the process is subject to a process-specific emission limitation or standard or if the total emissions from the process exceed 10% of the significance levels\*\*\* described in the following table.

# REPORTING THRESHOLDS

\*AQD-013 Policy and Procedure
Criteria Pollutant Threshold Levels for Point Source Emissions Inventory

POLLUTANT	THRESHOLD (per facility)
Carbon Monoxide	100 tons per year
Nitrogen Oxides	40 tons per year
Sulfur Dioxide	40 tons per year
Particulate Matter (PM)	25 tons per year
PM-10	15 tons per year
Volatile Organic Compounds	10 tons per year
Lead	0.5 tons per year

# \*\*\*Rule 212(7) - "10% of Significant" Thresholds (per process) for Fee Subject Emissions from Specified Exempt Processes

POLLUTANT	THRESHOLD (per process)
Carbon Monoxide	10 tons per year
Nitrogen Oxides	4 tons per year
Sulfur Dioxide	4 tons per year
PM	2.5 tons per year
PM-10	1.5 tons per year
Volatile Organic Compounds	4 tons per year
Lead	0.05 tons per year

# **Helpful Links**

AQD Operational Memorandum 13: Criteria Pollutant Threshold Levels for the Emissions Inventory

Rule 2: Annual Reports (Page 2)

Rule 116(m): Definition of Potential to Emit (Page 18)

Rule 119(e): Definition of Significant (Page 23)

Rule 212(7): ROP Source Fee Calculations (Page 24)

Rule 278: Exclusion from Exemption (Page 63)

Rules 280 through 290: Exemptions (Page 64)

Rule 281(h): Cold Cleaner Exemption (Page 65)

Rule 282(b): Furnace, Oven and Heater Exemption (Page 65)

Rule 285(r)(iv): Cleaning Exemption (Page 71)

**NAICS Codes** 

**SCC Codes** 

**ROP Certification and Deviation Forms** 

# **Contacts**

AQD District Office Contact Information - View MAERS Assistance: InfoMAERS@Michigan.gov

AQD MAERS Coordinator: Amie Hartman(<u>HartmanA4@Michigan.gov</u> | 517-284-6741)

Environmental Assistance Center: 800-662-9278

This publication is intended for guidance only and may be impacted by changes in legislation, rules, policies, and procedures adopted after the date of publication. Although this publication makes every effort to teach users how to meet applicable compliance obligations, use of this publication does not constitute the rendering of legal advice.

The Michigan Department of Environment, Great Lakes, and Energy will not discriminate against any individual or group on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information or sexual orientation. Questions or concerns should be directed to the Quality of Life – Office of Human Resources, P.O. Box 30473, Lansing, MI 48909-7973.