

# 2020 Air Toxics Emissions Inventory Reporting

## Frequently Asked Questions

Information updated July 29, 2021

DEQ created this section to address commonly asked questions about the [2020 Air Toxics Emissions Inventory Reporting](#) requirements. For questions regarding the Cleaner Air Oregon program, including emissions inventory and reporting information, please visit the [Cleaner Air Oregon](#) website.

Title V, Standard, and Simple ACDP permitted facilities must report their toxic air contaminant emissions inventory for calendar year 2020 to DEQ (or LRAPA) by Sept. 1, 2021.

### 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, in a particular geographical location for a specific period of time. 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 2 of the Cleaner Air Oregon rule](#).

#### 2. How is this three-year Air Toxics Emissions Inventory different from CAO EI requirements? Does this reporting requirement mean that my facility has been called-in to the CAO program to perform a risk assessment?

This air toxics Emissions Inventory is a separate reporting requirement than an EI submitted for a CAO risk assessment. While they may contain similar information, they serve separate purposes.

The primary objectives of this every-three-year air toxics EI is to supply 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.

In contrast, a CAO EI is used to perform a source risk assessment for called-in existing facilities and new facilities seeking a Simple, Standard or Title V permit. Visit the Facilities section of the [Cleaner Air Oregon website](#) for more information about CAO call-ins.

Refer to the [Air Toxics Reporting Background](#) for more information about the origin of this program.

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

For the 2020 reporting cycle, if you own or manage a Standard or Simple air quality permitted facility in the State of Oregon under the Air Contaminant Discharge Program, or the Title V program, then reporting is mandatory. Failure to provide the



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**Air Quality Division**  
700 NE Multnomah St.  
Suite 600  
Portland, OR 97232  
Phone: 503-229-5696  
800-452-4011  
Fax: 503-229-6124  
Contact: Clara Funk

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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 2020 operating year from Basic and General ACDP permit-holders for this 3-year reporting cycle.

#### 4. How do I know what type of permit (i.e. General, Basic, Simple, Standard or Title V) my facility was issued?

This information is located on the first page of your issued permit. Check [DEQ Permits Online](#) to locate an electronic copy.

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

Facilities in Lane County have the same 2020 reporting requirements; these facilities will report directly to the Lane Regional Air Protection Agency instead of the Department of Environmental Quality. Facilities in Lane County should contact LRAPA directly with questions or concerns at (541) 736-1056.

#### 6. I received a GovDelivery notice or email about air toxics reporting, but never received an official letter or email about the reporting requirement. Why?

DEQ frequently uses GovDelivery, a voluntary email listserv, to send informal update information to sources and stakeholders. Formal communications will be sent via email and/or letter on file for each facility. Please confirm with your [DEQ permitting office](#) that your facility's contact information is up-to-date, including the email address of the responsible official. DEQ sent the official letter for this reporting requirement in April 2021.

## Questions for Basic and General ACDP permit-holders

#### 1. I received an email saying that I do not need to submit an air toxics emissions inventory this year. Does this mean I do not have to submit an annual report for my permit?

No. The Air Toxics Emissions Reporting effort is different and separate than the reporting sources perform for annual permitting compliance. You should continue to submit your annual reports as normal. Refer to DEQ's [Basic and General ACDP Permits](#) page for more information about annual reporting.

Refer to the [Air Toxics Reporting Background](#) page for more information about this air toxics reporting requirement.

#### 2. Do I still need to pay my permit fees this year?

Yes. This air toxics emissions inventory effort is unrelated to your permitting fees. Please contact your [DEQ permitting office](#) or your permit writer or inspector with questions about your permit compliance.

#### 3. Why don't Basic and General ACDP sources need to report air toxics this year?

Basic and General ACDP permits are structured such that potential emissions may come from a relatively narrow set of allowable permitted operations specific to each permit category. DEQ has developed a method to estimate these emissions for sources based on information gathered from annual reports. It was necessary to



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**Air Quality Division**  
700 NE Multnomah St.  
Suite 600  
Portland, OR 97232  
Phone: 503-229-5696  
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Fax: 503-229-6124  
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request a complete inventory from these sources in 2016 in order to develop this methodology, and it may be necessary to request inventories in future years to refine the estimates.

## Questions for Title V, Standard and Simple ACDP permit-holders

### 1. What do I need to do in 2020 to prepare for the reporting submittal in 2021?

DEQ recommends taking time to review your permit and permit review report, review your 2016 submittal for Air Toxics reporting, ensure that your recordkeeping and monitoring are up to date, and have Safety Data Sheets for any air toxics-containing material products you may use. Also review available emission factors for permitted activities, review control efficiencies for any air pollution control devices, and assemble available air toxics source test data in advance.

### 2. 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 2020 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.

### 3. Operations at my facility shut down in 2020. 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 2020 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 2020, you will need to report those operations. Facilities with a temporary closure for the full operating year do not need to report.

### 4. I manage a new facility and we started operation in 2020. Will I still need to report?

Yes. You should report all operations and emissions occurring in 2020. Please contact DEQ for more information.

### 5. 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 2021 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.

### 6. 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



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Suite 600  
Portland, OR 97232  
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Form completed with their facility information and a brief statement (recommended) in the "Facility Note" tab to indicate why the remaining worksheets are not completed.

## 7. 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 2020 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 2020.

New and existing CAO sources have the option to submit their approved CAO emission inventory, provided the emissions information is reflective of the 2020 operating year.

## 8. Is the 2020 Air Toxics Emissions Inventory reporting form available? Where can I find it?

Yes. The 2020 Air Toxics Emissions Inventory (ATEI) reporting form is now available on the [Air Toxics Emissions reporting](#) website, under the 'How to Report' section. Also available are DEQ Emission Factor Search Tools to facilitate emission factor searches for some commonly used equipment.

## Questions about Calculating Emissions

### 1. Will DEQ provide instructions and examples on how to fill out the reporting form?

Yes. The reporting form contains information in two places. The first tab provides a step-by-step overview for completing the form, and the form worksheets contain instructions in the column headers. Hover over the column header to make them appear. The emission factor search tools also provide step-by-step instructions with screenshots.

In addition, DEQ has developed a series of Tools and Quick Guides on specific topics which can be found in the 'How to Report' section of the ATEI reporting page. These contain examples and screenshots for how to fill out the reporting form with the required information. After reviewing the materials, please contact DEQ if you have additional questions.

### 2. 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 many cases, the facility permit or permit review report will dictate how emissions should be calculated for a specific emission unit or facility. 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 #3 below in the Submission FAQ).



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**Air Quality Division**  
700 NE Multnomah St.  
Suite 600  
Portland, OR 97232  
Phone: 503-229-5696  
800-452-4011  
Fax: 503-229-6124  
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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.

### 3. Please define emission factor and material balance.

*General Air Quality Definitions can be found in OAR 340-200-0020.*

*"Emission Factor" means an estimate of the rate at which a pollutant is released into the atmosphere, as a result of some activity, divided by the rate of that activity (e.g., production or process rate). The factor is usually expressed as pounds per unit weight, volume, length, distance, time, etc. An example is a benzene emission factor for a boiler expressed as pounds per million cubic feet of natural gas combusted, such as 0.0058 lb. benzene/MMscf natural gas.*

*"Material balance" means a procedure for determining emissions based on the difference in the amount of material added to a process and the amount consumed and/or recovered from a process.*

### 4. Does DEQ have any material balance guidance or tools?

Yes. Refer to the [Material Balance Quick Guide](#) for guidance and examples.

### 5. Additional definitions:

*Annual Production: The 'process rates,' such as material used, fuel burned, or products produced by an emission unit or activity in a given year.*

*2020 Annual Production: Actual annual process rates for an emission unit or activity for the 2020 calendar year.*

*Emissions Units and Activities: Devices or processes at a facility that emit or have the potential to emit air toxic pollutants. This includes any machine, equipment, raw materials, products, or byproduct that produces toxic air contaminant. An activity is any process, operation, action, or reaction, e.g., chemical, at a stationary source that emits toxic air contaminants. Operation and activities that may be omitted can be found in the list of [Categorically Insignificant Activities to Exclude](#).*

*Throughput: The amount of material used, fuel burned, or products processed or produced by an emission unit or activity for a given time period (i.e. hourly, annually, etc.).*

### 6. Which Emissions Units do I include in my Emissions Inventory?

All Emissions Units (EUs) included in the operating permit for a facility must be included in the emissions inventory as EUs unless they are *known* to not emit any air toxic contaminants listed in OAR 340-245-8020 Table 2. EUs included in the ATEI must be designated in the same manner as they are designated in the operating or construction 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 included in the Permit Review Report but do not have an EU ID in the permit.



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700 NE Multnomah St.  
Suite 600  
Portland, OR 97232  
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## 7. Are the Categorically Insignificant Activities to exclude for this program the same as for my permit?

Facilities compiling their 2020 ATEI reporting information may be able to exclude some kinds of operations if they are considered a 'categorically insignificant activity.' Emissions from these types of activities are considered insignificant when identifying emission units and/ or materials that emit toxic air contaminants at a facility [OAR 340-200-0020(23)].

Under CAO, the following activities are not considered insignificant and therefore still need to be reported under this request [OAR 340-245-0060(3)]:

*(23)(a) Constituents of a chemical mixture present at less than 1 percent by weight of any chemical or compound regulated under divisions 200 through 268 excluding divisions 248 and 262 of this chapter, or less than 0.1 percent by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year;*

## 8. My facility has a lot of emergency generators. Do they need to be included in the inventory?

It depends on whether the emergency generators qualify as Categorically Insignificant Emissions Units. If a facility has multiple generators or pumps, then aggregate horsepower rating in excess of 3,000 horsepower must be identified and included in the reporting [OAR 340-200-0020(23)(uu)].

*(23)(uu) Emergency generators and pumps used only during loss of primary equipment or utility service due to circumstances beyond the reasonable control of the owner or operator, or to address a power emergency, provided that the aggregate horsepower rating of all stationary emergency generator and pump engines is not more than 3,000 horsepower. If the aggregate horsepower rating of all stationary emergency generator and pump engines is more than 3,000 horsepower, then no emergency generators and pumps at the source may be considered categorically insignificant;*

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

Emission estimates should be based on actual 2020 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



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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 AP-42, trade or technical association data should typically be used, if available.
- 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*



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Portland, OR 97232  
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Fax: 503-229-6124  
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## 10. Will DEQ provide any emissions factor information or tools?

Yes. DEQ has created two Emissions Factors Search Tools to provide CAO-approved sets of emissions factors for commonly used equipment. 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.

## 11. Where can I find emissions factor information?

DEQ does not currently have a database of approved emission factors; 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](#)
- [Clearinghouse for Inventories and Emission Factors](#)
- [Locating & Estimating Documents](#)

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 \(Department of Ecology\)](#)
- [Washington State Air Toxic Sources and Emission Estimation Methods](#) (Department of Ecology)

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## 12. 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.

## 13. 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 diesel generators is highly encouraged. These are provided in the DEQ Combustion Activities Emissions Factors Search Tool. More explanation about these units can be found on the Cleaner Air Oregon webpage, [CAO FAQ for Step 2](#).

Note that the CAO page recommends that the facility provide the manufacturer recommended emission factor for diesel particulate matter (DPM), when available. Following the hierarchy presented in FAQ #8 above, facilities are encouraged to follow this strategy and use the Emissions Factor Search Tool for DPM emission factor when other options are not available.

## 14. What are Safety Data Sheets?

Safety Data Sheets, Material Safety Data Sheets, and Technical Data Sheets 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.

## 15. Do you only include stationary source emissions or mobile emissions such as forklifts?

If mobile emissions (i.e. vehicular traffic, forklifts, onsite mobile equipment, etc.) are already included in your permit then you will need to report them. Otherwise, mobile emissions are excluded because they are typically considered a [Categorically Insignificant Activity](#).

## 16. 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 an air 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.

## 17. 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,



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700 NE Multnomah St.  
Suite 600  
Portland, OR 97232  
Phone: 503-229-5696  
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etc.), 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.

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



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Suite 600  
Portland, OR 97232  
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## ATEI Reporting Form Technical Troubleshooting

### 1. 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.

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

The reporting form is 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. For material balance calculations, users may find it necessary to convert product usage from volume per year to pounds per year prior to completing the reporting form, which requires that product usage and waste are presented as pounds per year.

### 3. 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.

### 4. 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.

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

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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.

## 6. 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. If you have concerns or questions about the reporting form, please contact DEQ.

## Questions about Submitting the Air Toxics Emissions Inventory

### 1. 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.state.or.us](mailto:aqDocumentUpload@deq.state.or.us) with questions about the facility email contact and PIN. Confirm your facility's contact information is up-to-date with your [DEQ permitting office](#).

### 2. 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 & 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 2020 ATEI form must be submitted as an Excel spreadsheet.

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

Space is provided in the second 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).

### 4. 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



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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.

For questions about the 2020 Air Toxics Emissions Inventory reporting, contact [Clara Funk](#). For all other permitting questions, contact your regional [DEQ permitting office](#). For LRAPA facilities, please contact LRAPA directly at 541-736-1056.



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