

Guidance for Reporting 2020 and 2021 Emissions Data: Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants

Applicability and Data Transactions

1 Introduction

This document provides guidance for determining applicability for California facilities subject to the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR) and for reporting CTR data parameters to the California Air Resources Board (CARB) CEIDARS database for 2020 emissions data reported in 2021 and 2021 emissions data reported in 2022. Further guidance will be issued by CARB later, addressing requirements related to amendments to the CTR, that are anticipated to become effective January 1, 2022.

Unlike the official published regulation, this guidance does not have the force of law, does not establish or modify requirements, and in no way supplants, replaces, or amends any of the legal requirements of the CTR. Conversely, an omission or truncation of regulatory requirements in this guidance does not relieve operators of their legal obligation to fully comply with all requirements of CTR. The full regulation is available here: <https://ww3.arb.ca.gov/regact/2018/ctr2018/ctrfro.pdf>.

2 Applicability for Reporting 2020 and 2021 Emissions Data

Specific data reporting requirements are phased-in under CTR. The following sections provide details regarding the phased-in reporting requirements for emissions occurring in 2020 and 2021 (i.e., data years 2020 and 2021). Figure 1, which follows this section, summarizes the applicability and reporting requirements in a flowchart.

2.1 Who Reports 2020 and 2021 Data?

The following groups of facilities are required to report 2020 and 2021 emissions data. For the purposes of this document, “permitted facilities” are defined as facilities that have been issued one or more permits to operate by the local air pollution control district or air quality management district. The “data year” is the calendar year in which emissions occur.

1. Permitted facilities that are required to report greenhouse gas (GHG) emissions to the CARB Mandatory Reporting Program for Greenhouse Gases (MRR) for the relevant data year (2020 or 2021, as applicable) (GHG Facilities). This category does not apply to facilities that only report Sulfur Hexafluoride (SF6) emissions associated with their electricity transmission equipment to CARB and which are not subject to any of the applicability criteria listed in the CARB MRR.
2. Permitted facilities that are authorized by district permit to emit 250 tons per year (tpy) of a criteria pollutant in a nonattainment area at the beginning of the data year, regardless of actual emissions (Criteria Facilities). For 2020 data and onward, the applicability for “Criteria Facilities,” is based on permitted emissions, and not actual emissions.
3. Permitted facilities identified by their local air district as “high priority” as of January 1 of the data year (Elevated Toxics Facilities), based on the district’s implementation of the AB 2588 “Hot Spots” requirements.

Question: My facility does not have any permits issued by an air district. Does that mean the facility is not subject to the CTR requirements?

Answer: That’s correct. If the facility has not been issued any permits to operate by an air district, the facility is not subject to the CTR reporting requirements. Please refer to the regulation for definition of a permit.

Question: My facility does report to the MRR program, but the MRR facility ID number, and the MRR report submitted to CARB, include emissions from several different facilities, as identified by the local air district. How should we report emissions under CTR?

Answer: For CTR reporting, the emissions should be reported under the facility boundaries and facility ID numbers, as determined by the local air district. If the GHG emissions from multiple facilities as identified by the local air district are combined and reported together under the MRR reporting requirements, the criteria pollutant and toxic air contaminant emissions should still be reported as associated with the facility ID numbers as determined by the air district. Any permitted facility whose GHG emissions are included in a CARB MRR GHG report should also report (as applicable) to the CTR program, under the district’s assigned facility ID number.

2.2 What Do Facilities Report for 2020 and 2021 Data?

CTR’s phase-in provisions provide the option for “business as usual” (BAU) reporting in which facilities are only required to report what they have historically reported to their local district, but updated to reflect the current year’s emissions, for specified reporting years and applicability categories. BAU reporting is phased out and the requirements of CTR section 93404 are phased-in as explained in the following sections.¹

¹ For 2019 data reported in 2020, all facilities subject to CTR were allowed to use BAU reporting and could provide emissions or activity data for either the 2019 calendar year or the most recent 12-month period, as determined by the district.

2.2.1 Data Year 2020

For 2020 data reported in 2021, only “Elevated Toxics Facilities,” that are not “GHG Facilities” or “Criteria Facilities,” are allowed to continue with BAU reporting. “GHG Facilities” and “Criteria Facilities” must begin reporting all data required under CTR section 93404 (except stack parameter reporting is deferred until 2022 data reported in 2023) and must provide calendar year data rather than an alternate 12-month period.

Table 2.1. Data Year 2020 Reporting

Facilities	Emission Report Contents	Data Year/Time Period Reported	Due to District
“GHG Facilities” and “Criteria Facilities”	Must report all data parameters as specified in CTR section 93404 (e.g. NAICS codes, latitude/longitude, device and process information, etc.), except stack parameters listed in section 93404(a)(6)	The 2020 calendar year only	May 1, 2021 (or alternate date, as established by district), in air district-required format
“Elevated Toxics Facilities”	“Business-as-usual”: All data as specified by the local air district’s existing emissions reporting program and methods	The 2020 calendar year, or the most recent 12-month period as determined by the district	May 1, 2021 (or alternate date, as established by district), in air district-required format

Question: None of a facility’s actual criteria pollutant emissions exceed 250 tpy, but the facility’s permitted emissions threshold for a criteria pollutant is over 250 tpy, and a portion of the district is designated as a nonattainment area. Is the facility subject to reporting?

Answer: Yes. Starting with 2020 data reported in 2021, the applicability for “Criteria Facilities” is based on permitted, and not actual, emissions. Therefore, if the facility is permitted to emit greater than 250 tpy of any criteria pollutant, and any portion of the district is designated as a nonattainment area for any criteria pollutant, then full reporting is required for the facility.

2.2.2 Data Year 2021

Beginning with 2021 data reported in 2022, no facilities may use BAU reporting, and all facilities subject to CTR must report all data elements specified in 93404 (except stack parameter reporting is deferred until 2022 data reported in 2023).

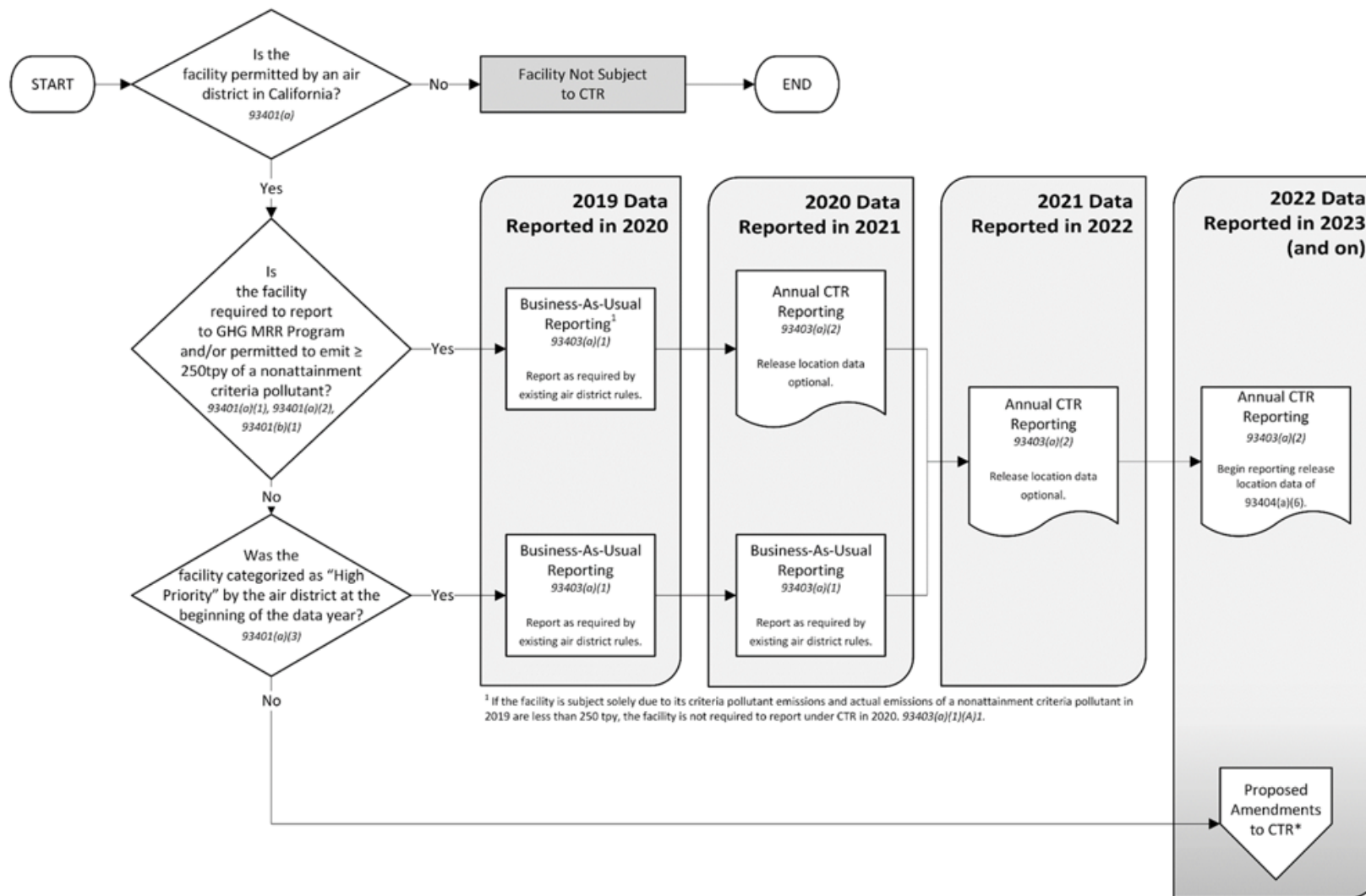
Table 2.2. Data Year 2021 Reporting

Facilities	Emission Report Contents	Data Year/Time Period Reported	Due to District
All Facilities subject to CTR Applicability Criteria	Must report all data parameters as specified in CTR section 93404 (e.g. NAICS codes, latitude/longitude, device and process information, etc.), except stack parameters listed in section 93404(a)(6)	The 2021 calendar year only	May 1, 2022 (or prior to this date, as established by district), in air district required format

2.2.3 Stack Parameter Reporting

If stack parameter data (emissions release point location, height, exit temperature, velocity, diameter, etc.) has previously been reported to CARB for a facility, or is readily available, it should be reported and updated as applicable. Beginning with 2022 data reported in 2023, stack parameter data specified in 93404(a)(6) must be reported by all GHG, Criteria, and Elevated Toxics Facilities, and data must be updated thereafter, as needed.

Figure 1. Applicability and Reporting Requirement Summary Flowchart



*Guidance in development, information regarding the proposed amendments is available here: <https://ww2.arb.ca.gov/rulemaking/2020/ctr2020>

3 Data Transactions

This section applies to Air Districts only, at this point in time. Facilities should provide information to their local air district, as applicable, in the format specified by the air district. Air districts then compile and submit the data as further indicated in this section.

The following tables are intended to clarify how the local air districts should report CTR-required data to CARB in the CEIDARS database format. The tables are based on the current CTR adopted by CARB in December 2018, which became effective January 1, 2020. **Some reporting requirements, and many of the section numbers indicated below, are expected to be revised for 2022 data reported in 2023, as a result of the CTR amendments.** The amendments are anticipated to go into effect on January 1, 2022.

The data parameters required by CTR section 93404 are listed in the following tables with their corresponding CEIDARS field names. In addition to the data required by CTR, CEIDARS transaction files also require other fields such as Transaction ID, Transaction Date, Action, and information to identify the facility (CO, FACID, AB, DIS) for other types of transactions.

Table 3.1. Facility (FAC) Transactions

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(2)(A)	Facility Name	FNAME	
93404(a)(2)(A)	Facility ID number	FACID	
93404(a)(2)(B)	Owner/Operator legal name	MNAME	
93404(a)(2)(B)	Owner/Operator street address	MSTREET	Owner/Operator's mailing address
93404(a)(2)(B)	Owner/Operator city	MCITY	
93404(a)(2)(B)	Owner/Operator state	MSTATE	
93404(a)(2)(B)	Owner/Operator zip code	MZIP	
93404(a)(2)(B)	Owner/Operator zip code extension (as applicable)	MZIPEXT	
93404(a)(2)(C)1.	Facility primary NAICS code	FNAICS	North American Industry Classification Code
93404(a)(2)(D)	Facility primary SIC code	FSIC	Standard Industrial Classification Code
93404(a)(2)(E)	Air basin	AB	Air Basin where facility is located (as defined at https://www.arb.ca.gov/ei/maps/statemap/abmap.htm)
93404(a)(2)(E)	Air district	DIS	Local Air District where facility is located
93404(a)(2)(E)	County	CO	County where facility is located
93404(a)(2)(F)	Facility street address	FSTREET	Facility's physical address
93404(a)(2)(F)	Facility city	FCITY	
93404(a)(2)(F)	Facility Zip code	FZIP	
93404(a)(2)(F)	Facility Zip code extension (as applicable)	FZIPEXT	
93404(a)(2)(G)	Facility latitude	Y_USERCOORD, COORD_SYS, DATUM	User Coordinate in COORD_SYS Units, so COORD_SYS and DATUM should also be reported; of facility address or centroid of facility
93404(a)(2)(G)	Facility longitude	X_USERCOORD, COORD_SYS, DATUM	User Coordinate in COORD_SYS Units, so COORD_SYS and DATUM should also be reported; of facility address or centroid of facility

* Some reporting requirements, and many section numbers, are proposed to be revised for 2022 data reported in 2023 as a result of the CTR amendments.

Table 3.2. Device (DEV) Transactions

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(3)(A)	Device ID	DEV	
93404(a)(3)(B)	Device name or description of device	DEVNM	
93404(a)(3)(C)	U.S. EPA Unit Type Code	EQYPEC	For 2020 data, this field is not required to be reported. For 2021 data, we plan to use EQYPEC for the U.S. EPA Unit Type Code. CARB will contact districts currently using the EQYPEC field to ask about its current uses.
93404(a)(3)(D)	Air District Permit ID associated with the device	PERID	
93404(a)(3)(E)	For combustion devices only, design capacity of device	EQSIZE	For 2021 data and onward, we plan to use EQSIZE for the design capacity of combustion devices. CARB will contact districts currently using the EQSIZE field to ask about its current uses.
93404(a)(3)(E)	For combustion devices only, design capacity units	EQUNITC	For 2021 data and onward, we plan to use EQUNITC for the design capacity units of combustion devices. CARB will contact districts currently using the EQUNITC field to ask about its current uses.

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Table 3.3. Process (PRO) Transactions

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(4)(A)	Process ID	PROID	
93404(a)(4)(A)	Process name or description	PRDESC	
93404(a)(4)(B)	Device ID associated with the process	DEV	
93404(a)(4)(C)	Release location associated with the process, as applicable	STK	Stack ID
93404(a)(4)(D)	Source Classification Code	SCC	
93404(a)(2)(D)	Secondary or additional SIC code	SIC	Process SIC
93404(a)(2)(C)2.	Secondary and additional NAICS code	NAICS	Process NAICS

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(4)(E)	Activity level	PR	Activity data that is used by the facility or the local air district to quantify emissions for each permitted device and process (e.g. volume of fuel, hours of operation, etc.), and activity data for any unpermitted sources that are quantified by the district.
93404(a)(4)(F)	Activity level unit of measure	PRUNITS	Automatic; determined from SCC code
N/A	Description of activity level data acquisition method	PRORIG	The planned amendments to CTR include this data parameter; it is not currently required. We plan to use PRORIG for description of activity level data acquisition method. CARB will contact districts currently using the PRORIG field to ask about its current uses.

* Some reporting requirements, and many section numbers, are proposed to be revised for 2022 data reported in 2023 as a result of the CTR amendments.

Table 3.4. Emission (EMS) Transactions

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(1)	Data year being reported (the year in which emissions occur)	REASCH	Vintage of emissions
93404(a)(5)(A)	Process ID associated with the pollutant	PROID	
93404(a)(5)(B)	Device ID associated with the pollutant	DEV	
93404(a)(5)(C)	Pollutant code or emittent ID	POL	
93404(a)(5)(D)	Actual emissions	EMS	
93404(a)(5)(E)	Actual emissions units of measure	N/A	Automatic, based on chemical: Tons per year for criteria pollutants, Pounds per year for toxics, Curies per year for radionuclides
93404(a)(5)(F)	Emission factor as applicable	EMFACT	
93404(a)(5)(G)	Source of emission factor	EMORIG	
93404(a)(5)(H)	Emission factor units of measure	N/A	Automatic: emissions (in tons, pounds, or curies, as applicable) divided by SCC units
93404(a)(5)(I)	Emission calculation method	METH	

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(5)(J)	Permit or rule emissions limit(s) for industrial sources, if applicable	N/A	This field is being eliminated from the CTR, and reporting of this field is not required.
N/A	Control efficiency of all emissions control devices (if the control efficiency is used to quantify emissions)	CNTLEFF	Control Efficiency (Percent). The planned amendments to CTR include this data parameter; it is not currently required.

* Some reporting requirements, and many section numbers, are proposed to be revised for 2022 data reported in 2023 as a result of the CTR amendments.

Table 3.5. Stack (STK) Transactions

CTR Section*	CTR Data Parameter	CEIDARS Field Name	Notes
93404(a)(6)(A) and 93404(a)(6)(C)6.	Release location type and Release point type (Release point physical configuration)	SRCTYP	For 2021 data, we plan to use SRCTYP for release location type and release point physical configuration. Options will include fugitive, vertical, horizontal, goose-neck, vertical with rain cap, downward-facing vent, or unknown. CARB will contact districts currently using the SRCTYP field to ask about its current uses.
93404(a)(6)(B)	Geospatial coordinates	COORD_SYS, DATUM, X_USERCOORD, and Y_USERCOORD	User Coordinates of stack location in COORD_SYS Units, so COORD_SYS and DATUM should also be reported
93404(a)(6)(C)1.	Stack ID	STK	
93404(a)(6)(C)2.	Release location height above ground	STKHT	
93404(a)(6)(C)3.	Release location exit gas temperature	GT	
93404(a)(6)(C)4.	Stack diameter in feet	STKDIAM	
93404(a)(6)(C)5.	Exit gas velocity	GV	Either velocity or flow rate may be reported
93404(a)(6)(C)5.	Exit gas flow rate	GF	Either velocity or flow rate may be reported

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