

# Frequently Asked Questions About Certified Emissions Statements

1. *What is the FEIN number that is requested on the first page, or Section 1, of the Certified Emissions Statement Invoice?*
  - a. It is a nine-digit number assigned to entities, such as corporations and partnerships, for tax filing and reporting purposes. The number establishes a business tax account. See someone in your accounting department for the number.
2. *May the designated environmental contact complete and sign the CES Invoice?*
  - a. The environmental contact may prepare the Invoice, however they may sign it only if they are by definition a “Responsible Official” or have been delegated signature authority (via written letter to the DAQ) by the Responsible Official. The person signing the CES should review the information as they are certifying the truth, accuracy, and completeness of the document. The definition of Responsible Official is found on the back of the CES. CESs that are signed by someone other than the Responsible Official on file with the DAQ will be deemed incomplete.
3. *If our facility emits over 4,000 tpy of NO<sub>x</sub> are we required to report the actual amount?*
  - a. Yes. The fee is based on a maximum of 4,000 tpy per pollutant; however, the total amount must be reported.
4. *Are CES / Title V fees based on PM<sub>2.5</sub>, PM<sub>10</sub>, or total PM?*
  - a. Title V fees are based on total filterable and condensable particulate matter.
5. *What are Hazardous Air Pollutants (HAPs)?*
  - a. HAPs are air pollutants that can cause serious health and environmental hazards. They include chemicals that are known or suspected to cause cancer or other serious health effects. There are 188 Substances Listed as HAPs ([link below](#)). Each HAP has an ID #, or CAS Registry Number that should be included on the HAPs worksheet when reporting HAPs. A complete list of HAPs can be found at the following:  
[http://www.dep.wv.gov/daq/Air%20Toxics/Pages/HazardousAirPollutants\(HAPs\)List.aspx](http://www.dep.wv.gov/daq/Air%20Toxics/Pages/HazardousAirPollutants(HAPs)List.aspx)  
or <http://www.epa.gov/ttn/atw/188polls.html>
6. *Do we report all particulate matter on the HAPs worksheet?*
  - a. No. You are to report only the particulate matter that is considered a hazardous air pollutant on the worksheet. However, you include all particulate matter (HAPs included) on line 1b of the Invoice.
7. *Are we required to return the HAPs worksheet with the CES Invoice and payment?*
  - a. Yes.
8. *What are Class I and Class II substances?*
  - a. These are ozone depleting substances, more information and a specific list can be found through the EPA at the following:  
Class I: <http://www.epa.gov/Ozone/ods.html>  
Class II: <http://www.epa.gov/Ozone/ods2.html>
9. *Our facility is subject to Title V, however, the source is not subject to any emission limits. Are we required to pay fees?*
  - a. Yes. All facilities subject to the program are required to pay annual fees.
10. *Our facility is subject to Title V, however, it is a deferred source. Do we pay annual fees?*
  - a. Yes, a CES Invoice will be mailed to you. You need to complete the invoice and return it along with the applicable fee.

## Frequently Asked Questions Continued

11. *We purchased a facility in operation in the past year. The seller transferred the current permit to us. When the next year's CESs are mailed to us in July, will our fees be based on the emissions from the time that we took ownership?*
  - a. No, your fees will be calculated from the emissions for the entire calendar year which may include the emissions from the operations of the seller.
12. *We did not operate during the prior calendar year. Do we pay fees since we had no emissions and how do we complete the CES?*
  - a. Yes, you will have to pay a fee. Check the appropriate boxes above the Emissions blocks, then enter a zero on line 10 and enter the amount due on line 13 (which is the minimum fee from line 12)
13. *Our facility is subject to Title V. However, we ceased operations in January. We would like to retain the ability to reopen in the future, do we still pay annual fees?*
  - a. Yes, you must still pay the annual fees, based on the actual emissions for the previous calendar year (or the rule 22 fee, whichever is greater).
14. *What happens if we declare that our facility has permanently shutdown and we discontinue paying Title V fees, but we decide to reopen a year or two later?*
  - a. You would be required to obtain a new construction permit (NSR).
15. *How long should a facility retain the actual emissions calculations and supporting data?*
  - a. The records should be maintained for a period of five years. Additionally, these records shall be submitted to the Director or his representative upon request
16. *We are unable to locate our CES Invoices for prior years. Can we obtain copies from the agency?*
  - a. As with most DEP documents, copies of CES invoices and the supporting data should be maintained at the facility for a period of five years. However you may contact the agency for copies by submitting a request via e-mail to [depfoia@wv.gov](mailto:depfoia@wv.gov) or by postal service at 601 57th Street, SE, Charleston, WV 25304. Also, you can visit the following web-page: <http://www.dep.wv.gov/pio/Pages/default.aspx>, for more directions on information requests.
17. *Many facilities are required to complete Emissions Inventories in addition to CESs. What is the difference?*
  - a. Emissions Inventory Submissions and CESs differ in the following ways:
    - Emissions Inventories are required of non-deferred Title V sources only. Deferred Title V sources are not required to submit emissions inventories.
    - Emissions Inventories require the use of specialized computer software and are more detailed.
    - Emissions inventories require calculation of emissions of all federally-reportable pollutants at each process, identification of all stacks, and characterization of control equipment from each process.
    - Operating fees are collected based on the CESs, not the emissions inventory. However, the emissions inventory is used to verify the CES emissions reported.
    - TSP and PM10 are both reported, along with PM2.5 if available, in the Emissions Inventories. However, Title V fees are based on total PM.
    - Emissions Inventories deemed incomplete are returned but are not counted as delinquent.
    - Emissions Inventories accept estimates for greenhouse gases (GHGs). These are not included on CESs.