

2026 Air Toxics Emissions Inventory Reporting Frequently Asked Questions

Information updated June 29, 2026

LRAPA created this resource to address commonly asked questions about the 2026 Air Toxics Emissions Inventory (ATEI) Reporting requirements.

Title V, Standard, and Simple ACDP permitted facilities must report their toxic air contaminant emissions inventory for calendar year 2026 to LRAPA by July 1, 2027.

Visit the LRAPA [Air Toxics Emissions Reporting](#) webpage for more information. Also see the DEQ [Air Toxics Emissions Reporting webpage](#).

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. An *air toxics* emissions inventory is an accounting of the amount of each toxic air contaminant emitted from each individual emissions-producing unit or activity.

A list of pollutants which are recognized by Oregon DEQ as Toxic Air Contaminants (TACs) is available in [Table 1 of Division 247 Health Risk-Based Air Quality Standards for Toxic Air Contaminants](#). The list of pollutants is also available on the ATEI Reporting Form.

2. Are the 2026 ATEI reporting requirements different from the 2023 and 2020 ATEI?

No, for sources in Lane County, the current reporting effort is largely the same, and the reported information should be similar, but with 2026 operating data.

Differences could arise if there was a change in the permit, either through renewal or modification, if some emission units were shut down or not operational, if emission units were added through Notice to Construct or Notice of Approval, or if there were omissions in the 2023 report. In addition, Material Balance information would change depending on new product usage and formula modifications.

For sources outside of Lane County, DEQ has changed how reports are submitted. DEQ ATEI reports will be submitted through the Your DEQ Online (YDO) portal. Contact your DEQ permitting office if you have any questions. You can also get in touch with the DEQ ATEI program contacts found at the bottom of this FAQ document.

3. How is the 2026 ATEI reporting form different from the 2023 reporting form, and can I reuse my 2023 form with updated information?

The difference between the 2026 and 2023 ATEI reporting forms is minimal.

The 2023 reporting form included a new Material Balance summary tab named "MB Summary".

The 2026 form builds on the 2023 addition and includes a new summary tab for the "Pollutant Emissions – EF" tab, called the "EF Summary" tab. The tabs were renumbered to account for the new summary tab. This new tab automatically sums all the air toxics from the "Pollutant Emissions – EF" tab. No additional reporting work is necessary to complete the EF Summary tab or the MB Summary tab.

It is strongly preferred that facilities use the new reporting form for the 2026 ATEI because of the tab numbering changes, which are also reflected in this FAQ. Please do not attempt to structurally update or modify the form.

4. Can I request a copy of my reviewed 2023 ATEI Reporting form?

Yes. A designated facility contact may request a copy of their past ATEI form at any time. Please contact your permit writer if you would like to request a copy of any past forms.

5. How is this three-year Air Toxics Emissions Inventory different from CAO EI requirements?

The Emissions Inventories for CAO and ATEI do contain similar information, but they serve separate purposes. The Air Toxics Emissions Inventory is a separate reporting requirement from an EI submitted on an AQ520 form for a CAO risk assessment.

The primary objectives of this recurring three-year ATEI are to provide statewide information that allows LRAPA and 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. Subsection 2(a) of OAR 340-245-0040 and Section (3) of OAR 340-245-0010 allows LRAPA to periodically request air toxics emissions information, even when sources are not in the CAO program. Refer to the [Air Toxics Reporting Background](#) for more information about the origin of this recurring three-year reporting program.

6. Does this reporting requirement mean that my facility has been called-in to the CAO program to perform a risk assessment?

No, only facilities that have been formally called into the Cleaner Air Oregon program, or have sought a new Simple, Standard or Title V permit since November 2018 are considered CAO facilities and must perform a risk assessment.

Visit the LRAPA [CAO webpage](#), or the “[For Facilities](#)” section of the DEQ CAO website for more information about the CAO risk assessment process. Also see FAQ #13 below for CAO facilities.

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

For the 2026 reporting cycle, if you own or manage a Title V facility or a Standard or Simple ACDP air quality permitted facility in the State of Oregon, then reporting is mandatory. Failure to provide the requested information is a violation of OAR 340-245-0040(2), for which LRAPA may impose a civil penalty and issue an order to comply.

LRAPA is not requiring Air Toxics emissions data from Basic and General ACDP permit-holders for this three-year reporting cycle.

8. I already submit a lot of this information as part of my permitting Annual Report. Do I need to do both?

Yes, facilities will need to complete a 2026 Air Toxics Emission Inventory reporting form in addition to any routine reporting requirements in their permit conditions. A standardized form is necessary for LRAPA to retrieve the equivalent information from all facilities.

9. Operations at my facility shut down in 2026. 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 2026 and the air permit is no longer active with LRAPA, you do not need to report.
- Temporary closure of facility. If your facility operated for any portion of 2026, you will need to report those operations.
- Facilities with a temporary closure for the full operating year do not need to report.

10. I manage a new facility, and we started operation in 2026. Do I need to report?

Yes. You should report all operations and emissions that occurred in 2026. Please contact LRAPA for more information if you have questions.

11. Who is responsible for reporting if my business has been sold?

The current owner or operator of the air permit at the time of submission in 2027 is responsible for reporting. Contact LRAPA to confirm the contact information for this individual is accurate. Please contact LRAPA if you have questions about this reporting requirement.

12. 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 rare 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 Form completed with their facility information and include a brief statement in the "Facility Notes" tab to indicate why the remaining tabs are not filled in.

13. My facility has been "called-in" to the Cleaner Air Oregon program. Do I still need 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 2026 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 or before 2026. For more information, refer to the CAO definition of New and Existing Facility on the DEQ [CAO FAQ](#) page, under Step 1.

Questions about calculating emissions

14. How should I prepare for the reporting submittal in 2027?

LRAPA recommends taking time to review your Permit and Permit Review Report, review your 2023 Air Toxics Emissions Inventory Reporting submittal, ensure that your recordkeeping and monitoring are up to date, and have Data Sheets (EDS or SDS) for any air toxics-containing material products you use. Also review available emission factors for permitted activities, control efficiencies for any air pollution control devices and assemble available air toxics source test data in advance.

15. 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 emissions; however, these may not be appropriate for all facilities. In some cases, the facility permit will dictate how emissions should be calculated for a specific emission unit or activity. If this is the case, a facility should use the method established in the permit for calculating 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 #38 below in the Submission FAQ).

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. In these cases, permit calculation methods for total VOC or Combined HAP should not be included to avoid redundancy with the individual calculations.

16. Which Emissions Units do I include in my Emissions Inventory?

All Emissions Units (EUs) included in the facility operating permit must be included in the emissions inventory as EUs unless they are known to not emit any air toxic contaminants listed in [OAR 340-247-8010](#) Table 1. EUs included in the ATEI must be designated in the same manner as they are designated in the operating 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 mentioned in the Permit Review Report but do not have an EU ID in the permit.

17. Are the Categorically Insignificant Activities to exclude for this program the same as for my permit?

It depends. Facilities compiling their 2026 ATEI reporting information may be able to exclude some kinds of operations if they are considered a “categorically insignificant activity” [\[LRAPA 12-005\(29\)\]](#); however, under CAO, the list of insignificant activities is further narrowed [\[OAR 340-245-0060\(3\)\]](#). Therefore, facilities should check both lists for confirmation. See FAQ #24 regarding Emergency Generators.

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

Emission estimates should be based on actual 2026 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:

- a. Existing air toxic emission factors in current permit or emission detail sheet.
- b. Source test data: Use 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.
- c. Source test data from similar equipment: If representative source-specific data cannot be obtained, emissions information from equipment vendors, particularly emission performance 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 LRAPA or other regulatory agency emission factors.
- d. Trade or technical association data: If no emissions information from equipment vendors or actual test data from similar equipment is available, emission factors from trade or technical association data should be used.

- e. LRAPA or DEQ emission factors, including the Emission Factor Search Tools (Combustion and Welding EF Tools).
- f. Compilation of EPA Air Pollutant Emission Factors (AP-42), or other state emission factors (e.g., California AQMD or Washington State Ecology emission factors). See FAQ #20 for links to other state EF resources. If emission factors are available from AP-42, trade or technical association data or LRAPA/DEQ, the source should propose whichever they believe is most representative of their process. If a range of emission factors is provided by an emission factor source, use the average of the range.
- g. Engineering judgment based on sound assumptions about the source type, industry, or site-specific conditions.

19. Will LRAPA provide any emissions factor information or tools?

Yes. LRAPA has Emission Factor Search Tools that provide CAO-approved sets of emissions factors for commonly used equipment. More tools are in development. 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. Contact LRAPA 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.

20. Where can I find emissions factor information?

LRAPA does not have a complete database of approved emission factors other than the CAO-approved Search Tools discussed above. 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.

EPA Resources:

- [AP-42](#)
- [WebFIRE](#)

Other Resources:

- [Air Pollution Control District County of San Diego: Calculation Procedures](#) (SDAPCD, California)
- [Santa Barbara Air Pollution Control District: Air Toxics for Business](#) (SBAPCD, California) (Look under the section "Air Toxics Calculations" for EF resources)
- [South Coast Air Quality Management District](#) (SCAQMD, California)
- [California Air Resources Board Emission Inventory Resources](#) (CARB)
- [Washington Clean Air Agencies](#) (Department of Ecology)

21. Can I use other emissions factor sources, and why does LRAPA need the reference information?

Yes, facilities are encouraged to seek out emission factors that best represent their emission units and operations. LRAPA requires reference information for each emission factor to confirm that the selections are appropriate.

22. How do I calculate emissions by Material Balance?

The [Material Balance Quick Guide](#) provides step-by-step instructions for performing Material Balance calculations, including how to complete tabs 5 and 6 on the ATEI reporting form.

23. What are Safety Data Sheets?

Safety Data Sheets, Material Safety Data Sheets, and Technical Data Sheets (collectively we refer to these as “SDS”) 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.

Environmental Data Sheets (EDS) are similar to SDS but are geared towards environmental regulation. They have more precise information about VOCs and HAPs, and EDS are generally preferred if they are available.

LRAPA will likely request your data sheets if they are not already on file.

The [Material Balance Quick Guide](#) describes how to locate the relevant information for this request.

Questions about specific emitting units and toxic air contaminants

24. My facility has one or more emergency generators. Do they need to be included in the inventory?

CAO, and therefore the ATEI, requires reporting of all on-site emergency generators, regardless of size or total horsepower. In accordance with federal regulations, sources are limited to 100 hours per generator per year as the maximum non-emergency operations. In the Emission Unit description, provide the generator size (in hp or kW), and only include non-emergency fuel usage for activity. See FAQ #25 for more information.

25. CAO recommends that sources use specific emissions factors for diesel generators. Does that apply to this inventory, too?

While the 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 Tiers 0 & 1 or Tiers 2, 3 & 4 diesel generators is highly encouraged. These are provided in the LRAPA Combustion Emissions Factors Tool.

Note: CAO recommends that facilities provide the manufacturer's emission factor for diesel particulate matter (DPM), when available. Following the hierarchy presented in FAQ #18 above, facilities are encouraged to use the manufacturer's supplied DPM emission factor. Use the Combustion Emission Factor Tool for DPM when there are no better options available. More explanation about these units can be found on the Cleaner Air Oregon webpage, [CAO FAQ](#) for Step 2.

It is not necessary to calculate "black puff" or start-up emissions from emergency generators for the purpose of ATEI reporting.

26. Are HAPs, TACs and VOCs the same, are they interchangeable?

No, there is some overlap between all three terms, and a pollutant might fall under all three categories, but each has a distinct definition.

TAC – Toxic Air Contaminant. A pollutant recognized by the Oregon EQC to cause adverse human health effects. This is a broader definition than an EPA recognized HAP, and includes more pollutants. See definition in [OAR 340-247-0020](#)

HAP – Hazardous Air pollutant. A pollutant recognized by EPA to cause cancer or other serious health impacts. Sometimes referred to as "air toxics" or "toxic air pollutants". See the EPA [webpage](#) on HAPs for more information.

VOC – Volatile Organic Compound. A carbon-based pollutant that has a high vapor pressure and low water solubility (i.e. it is likely to evaporate into the air at room temperature or lower). See the EPA [webpage](#) on VOCs for more information.

27. 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 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.

28. 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, etc. and does not appear exactly on the DEQ Pollutant List), the compound and its respective CAS should be listed in the reporting form as they appear on the SDS. For these compounds, LRAPA 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. See FAQ #33 about how these compounds appear in the reporting form.

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

29. How do I account for Abrasive Blasting Operations?

Blast material usage is considered the amount of blast medium sprayed. Sites that do not recycle should estimate annual usage from purchase and inventory records. Operations that recycle blast medium often spray the same material multiple times. Recycled blast material continues to break down into finer particulates each time it is sprayed. These sites should estimate annual usage from spray rate and hourly operation records.

Minnesota provides a great emissions calculator for [abrasive blasting operations](#).

ATEI reporting form technical troubleshooting

30. 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. If the reporting form is causing a problem, please contact LRAPA for assistance with the form.

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

The reporting form is partially locked and users are prevented from some actions such as inserting new columns, or inserting rows in the example area at the top of each tab (red text). This is necessary to ensure that LRAPA gathers equivalent information from all sources. If the reporting form is causing a problem, please contact LRAPA for assistance with the form.

32. The notes embedded 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.

There are instructions at the bottom of the "Instructions" tab for how to show or hide all the embedded notes.

33. Why do some pollutant names have a yellow background on Tabs 3 and 6?

A yellow background indicates that the pollutant name is not recognized on the DEQ TAC 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 directly from the DEQ Pollutant List. The yellow background does not indicate an error; it simply helps us identify new compounds.

34. I get an error message in the Calculate Annual Emissions [lb/yr] column on Tabs 3 and 6. What's wrong?

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 tab. The formula is sensitive to capitalization, special characters, and extra spaces (at the end of the EU ID, e.g.). For Tab 6, 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 or "drag and drop" to replace the formula, as described in FAQ #30, above.

35. LRAPA 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. LRAPA periodically releases new versions to clarify reporting issues based on feedback from sources. It is not necessary to update an already completed submission. Please contact LRAPA if you have concerns or questions about the reporting form.

Questions about submitting the air toxics emissions inventory

36. How do I submit my completed ATEI reporting form to LRAPA?

Please email your completed forms to:
ATEI@lrpa-or.gov

37. 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 Notes" space and the "References/Notes" spaces on Tabs 3 and 6. Facilities are asked not to submit Safety Data Sheet copies for their material usage unless specifically requested by LRAPA as a follow-up inquiry. **The 2026 ATEI Reporting Form must be submitted as an Excel spreadsheet.**

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

Space is provided in the "Facility Note" 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).

39. 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 LRAPA 34-020. It should be noted that emissions data is not considered confidential or a 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 page. A written request for review, meeting the conditions outlined in LRAPA 34-020, must accompany the submission or be provided to LRAPA in advance. Facilities planning to request CBI are encouraged to communicate directly with LRAPA and submit the CBI-containing reporting form directly to a LRAPA staff person via email.

Questions about LRAPA's review of air toxics emissions inventory reports

40. Will LRAPA change or add anything to my ATEI submission?

In our review, LRAPA may find it necessary to align misplaced information in the facility's submission, including refreshing the formulas or codes so they can be imported into our database. In some cases, LRAPA may add combustion emissions using the Combustion Emission Factor Search Tool and Annual Report data if emission units and emissions were improperly omitted from the reporting form. In most instances where emissions calculations are affected, LRAPA will contact the facility owner or operator to discuss. Contact LRAPA if you have questions.

41. Will I be able to access my facility's submitted ATEI report if I have questions in the future?

Yes. A designated facility contact will be able to request a copy of their reviewed ATEI. Contact LRAPA for assistance.

42. Will LRAPA make the emissions data publicly available?

LRAPA compiles the data from each facility after it is thoroughly reviewed, and it is available upon request.

LRAPA Program contacts

Please send reports and questions to:

ATEI@lrapa-or.gov

DEQ Program contacts

For DEQ facilities with questions about the 2026 Air Toxics Emissions Inventory reporting, contact Clara Funk at Clara.FUNK@deq.oregon.gov or David Broderick David.Broderick@deq.oregon.gov. For all other permitting questions, contact your regional [DEQ permitting office](#).

Non-discrimination statement

LRAPA does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit LRAPA's [Civil Rights and Environmental Justice webpage](#).