

**ALASKA DEPARTMENT OF ENVIRONMENTAL
CONSERVATION**

**Standard Permit Condition XV – Emission
Inventory Reporting**

**Permit Condition for Air Quality Permits
Adopted by Reference in 18 AAC 50.346**

September 27, 2010

Revised {*adoption date of regulations*} [MAY 18, 2016]

Standard Permit Condition XV – Emission Inventory Reporting

Stationary Source Categories This Condition Applies to: All stationary sources defined as point sources in 40 C.F.R. 51.50 [40 C.F.R.51.20].

The air emissions reporting requirements under 40 CFR 51, Subpart A apply to states; however, states rely on information provided by point sources to meet the reporting requirements of 40 CFR 51, Subpart A. In the past, the Department has made information requests to point sources, to which the point source is obligated to reply under 18 AAC 50.200. The information requests occurred on a routine basis as established by Part 51 Subpart A and consumed significant staff resources. The Department has determined that a standard permit condition best fulfills the need to gather the information needed to satisfy these requirements, as well as, increases governmental efficiency and reduces costs associated with routine information requests.

Permit Wording:

1. **Emission Inventory Reporting.** The Permittee shall submit to the Department reports of actual emissions **for the previous calendar year**, by **emissions** [EMISSION] unit, of CO, NH₃, NO_x, PM₁₀, PM_{2.5}, SO₂, **VOC**, [VOCS] and **lead** [LEAD] (Pb) and lead compounds, as follows:
 - 1.1. **Every-year inventory.** Each year by April 30, if the stationary source's potential to emit for the previous calendar year equals or exceeds:
 - a. 250 tons per year (TPY) of NH₃, PM₁₀, PM_{2.5}, or **VOC** [VOCS]; or
 - b. 2,500 TPY of CO, NO_x, or SO₂.
 - 1.2. **Triennial inventory.** Every third year by April 30, if the stationary source's potential to emit (**except actual emissions for Pb**) for the previous calendar year equals or exceeds:
 - a. **For stationary sources located in Attainment and Unclassifiable Areas:**
 - (i) **0.5 TPY** [.5 TONS PER YEAR] of actual **Pb** [LEAD (Pb)], or
 - (ii) **1,000** [1000] TPY of CO; or
 - (iii) 100 TPY of SO₂, NH₃, PM₁₀, PM_{2.5}, NO_x, or **VOC** [VOCS].
 - b. **For stationary sources located in Nonattainment Areas:**
 - (i) **0.5 TPY of actual Pb, or**
 - (ii) **1,000 TPY of CO; or**
 - (iii) **100 TPY of SO₂, NH₃, PM₁₀, PM_{2.5}, NO_x, or VOC; or as specified in Conditions 1.2.b(iv) through 1.2.b(vi):**

- (iv) for PM_{2.5} serious nonattainment: 70 TPY of SO₂, NH₃, PM_{2.5}, NO_x, or VOC; or**
- (v) for CO nonattainment (all areas): 100 TPY of CO; or**
- (vi) for O₃ nonattainment: 50 TPY NO_x or VOC (serious); 25 TPY NO_x or VOC (severe); or 10 TPY NO_x or VOC (extreme).**

1.3. For reporting under Condition 1.2, the Permittee shall report **the annual emissions from a previous calendar year** [IN 2015 FOR CALENDAR YEAR 2014, 2018 FOR CALENDAR YEAR 2017, 2021 FOR CALENDAR YEAR 2020, ETC., IN ACCORDANCE WITH THE ENVIRONMENTAL PROTECTION AGENCY SET SCHEDULE] **every third inventory year as scheduled by the EPA.**¹

2. **For each emissions unit, include** [INCLUDE] in the report required by **Condition 1** [THIS CONDITION,] the required data elements contained within the form **which can be found in the Emission Inventory Instructions <filename> at the Department's Air Online Services (AOS) system's Point Source Emission Inventory page at <webpage>, or if the Permittee prefers, the form** in **<cross-reference section number for SPC XVI – Emission Inventory Reporting Form>** [INSERT SECTION OF EMISSION INVENTORY FORM] OR THOSE CONTAINED IN TABLE 2A OF APPENDIX A TO SUBPART A OF 40 C.F.R. 51 FOR EACH STACK ASSOCIATED WITH AN EMISSION UNIT].

2.1. **Submit the report in accordance with the submission instructions on the Department's Standard Permit Conditions web page at <webpage>.**

[18 AAC **50.040(j)(4), 50.326(j)(3), 50.346(b)(8)**, [AND 18 AAC] & 50.200]
 [40 **C.F.R.** [CFR] 51.15, 51.30(a)(1) & (b)(1) and [40 CFR 51,]Appendix A, [TO] Subpart A[, 73 FR 76556 (12/17/08)]]

¹ Per 40 C.F.R. 51.30(b)(1), the EPA set the first triennial emissions inventory for the year 2011, which the Department was required to submit by the end of the following year (2012). Subsequent triennial inventories (2014, 2017, 2020 etc.) are due 12 months after the end of the inventory year, i.e., by December 31 of the following year. Therefore, the Department requires the Permittee to submit annual emissions for triennial inventories by April 30 every third year following the same schedule; i.e., submit the triennial report in 2021 for the calendar year 2020 emissions, in 2024 for the calendar year 2023 emissions, etc.

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

[THE STATE AND FEDERAL REGULATIONS FOR EACH CONDITION ARE CITED IN OPERATING PERMIT NO. <INSERT OPERATING PERMIT NUMBER>. THE DEPARTMENT ACKNOWLEDGES THE REPORTING BURDEN THAT PERMITTEES ARE SUBJECT TO AT THE END OF THE CALENDAR YEAR FIRST QUARTER THEREFORE THE DEPARTMENT WILL CHANGE THE DATE IN CONDITION XV.1.1 AND XV.1.2 FROM MARCH 31 TO APRIL 30. WITH THE DEPARTMENT'S CHANGE OF THE EMISSION INVENTORY DUE DATE, APPLICANTS SHOULD CONSIDER USING THE DEPARTMENT'S ELECTRONIC EMISSION INVENTORY SUBMISSION SYSTEM WHICH CAN BE FOUND IN THE PERMITTEE PORTAL UNDER AIR ONLINE SERVICES [HTTP://DEC.ALASKA.GOV/APPLICATIONS/AIR/AIRTOOLSWEB]. USE OF THE AIR ONLINE SERVICES GIVES CONTROL TO THE SUBMITTER OF THE EMISSION INVENTORY DATA ENTERED, SUBMITTED, AND REVIEWED.]

Condition <insert condition reference>, **Emission Inventory Reporting**

Legal Basis: This condition requires the Permittee to submit emissions data to the state [STATE] so the state is able to satisfy the federal requirement to submit emission inventory data from point sources as required under 40 C.F.R. 51.321. The emission inventory requirement [IT] applies to sources defined as point sources in 40 C.F.R. 51.50 [40 C.F.R. 51.20]. The state [STATE] must report all data elements required in 40 C.F.R. 51.15 and in [TABLE 2A] Tables 2a and 2b of Appendix A to Subpart A of 40 C.F.R. 51 to EPA.

Factual Basis: The Department used the language in SPC XV, as adopted by reference under 18 AAC 50.346(b)(8), for the permit condition.

The emission inventory data is due to EPA 12 months after the end of the reporting year (40 C.F.R. 51.30(a)(1) and (b)(1)[, 12/17/08]). Permittees have until April 30th to compile and submit the data to the Department. [A DUE DATE OF] April 30th PRESSURES THE DEPARTMENT TO HAVE SUFFICIENT TIME TO ENTER THE DATA INTO EPA'S ELECTRONIC REPORTING SYSTEM. THEREFORE] To expedite the Department's process of transferring data into EPA's electronic reporting system, the Department encourages Permittees [PERMITTEE] to submit [SHOULD CONSIDER SUBMITTING] the emission inventory through [AIR ONLINE SERVICES, PERMITTEE PORTAL] the Department's electronic emission inventory submission system found in the Permittee Portal on the Department's Air Online Services webpage <webpage>. Detailed instructions on completing and submitting the Emission Inventory form and the report form are available at the Point Source Emission Inventory page <webpage> by selecting the Emission Inventory Instructions button. A myAlaska account and profile are needed to gain access to the Permittee Portal.

[THE AIR EMISSIONS REPORTING REQUIREMENTS UNDER 40 C.F.R. 51, SUBPART A APPLY TO STATES; HOWEVER, STATES RELY ON INFORMATION PROVIDED BY POINT SOURCES TO MEET THE REPORTING REQUIREMENTS OF 40 C.F.R. 51, SUBPART A. IN THE PAST, THE DEPARTMENT HAS MADE INFORMATION REQUESTS TO POINT SOURCES, TO WHICH THE POINT SOURCE IS OBLIGATED TO REPLY UNDER 18 AAC 50.200. THE INFORMATION REQUESTS OCCUR ON A ROUTINE BASIS AS ESTABLISHED BY PART 51 SUBPART A AND CONSUME SIGNIFICANT STAFF RESOURCES. TO INCREASE GOVERNMENTAL EFFICIENCY AND REDUCE COSTS ASSOCIATED WITH INFORMATION REQUESTS THAT OCCUR ON A ROUTINE BASIS, IT HAS BEEN DETERMINED THAT A STANDARD PERMIT CONDITION BEST FULFILLS THE NEED TO GATHER THE INFORMATION NEEDED TO SATISFY THE REQUIREMENTS OF SUBPART A OF 40 C.F.R. 51.]

To ensure that the Department's electronic system reports complete information to the National Emissions Inventory, Title V stationary sources classified as Type A **(large) and Type B point sources** in Table 1 of Appendix A to Subpart A of 40 C.F.R. 51 are required to submit with each [ANNUAL] report [ALL] the data elements **(as applicable)** [REQUIRED FOR THE TYPE B SOURCE TRIENNIAL REPORTS (SEE ALSO) **in 40 C.F.R. 51.15 and Tables 2a and 2b** [TABLE 2A] of Appendix A to Subpart A of 40 C.F.R. 51)]. [ALL TYPE A SOURCES ARE ALSO CLASSIFIED AS TYPE B SOURCES.] However, [THE DEPARTMENT HAS STREAMLINED THE REPORTING REQUIREMENTS SO] Type A sources only need to submit **one**[A SINGLE TYPE OF] report every year, **not**[INSTEAD OF] both an annual report and a separate triennial report every third year.

Triennial reporting is required for Type B source and sources located in nonattainment areas of Alaska that have criteria pollutant emissions greater or equal to the tons-per-year amounts shown in Condition 1.2, as listed in Table 1 to Appendix A of 40 C.F.R. 51 Subpart A. The threshold values in Condition 1.2.b for sources in nonattainment areas apply depending on the nonattainment status of certain areas in Alaska for certain pollutants. As of June 9, 2017, Fairbanks and North Pole urban area have been designated by the federal administrator as "serious nonattainment" for PM_{2.5}. Therefore, to evaluate whether a stationary source located in Fairbanks and North Pole urban area qualify for triennial reporting, any of the threshold values in Conditions 1.2.b(i), 1.2.b(ii), 1.2.b(iii) (PM₁₀ only), and 1.2.b(iv) apply.