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 the regulations*} [JULY 22, 2020]

Standard Permit Condition XV – Emission Inventory Reporting

Stationary Source Categories This Condition Applies to: All stationary sources **regardless of permit classification, with the exception of owner requested limits (ORLs) issued under 18 AAC 50.225 and preapproved emission limits (PAELs) issued under 18 AAC 50.230** [DEFINED AS POINT SOURCES IN 40 C.F.R. 51.50].

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 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. **The Department added new requirements under 18 AAC 50.275, which allow for lowering the established emission thresholds to report triennial emissions to better meet the state's emission inventory reporting requirements to EPA.**

Permit Wording:

1. Emission Inventory Reporting. The Permittee shall submit to the Department reports of actual emissions for the previous calendar year, by emissions unit, of CO, NH_3, NO_X, PM_{10}, $PM_{2.5}$, SO_2, VOC, and 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 **(PTE)** for the previous calendar year equals or exceeds:

a. 250 tons per year (TPY) of NH_3, PM_{10}, $PM_{2.5}$, or VOC; or

b. 2,500 TPY of CO, NO_X, or SO_2.

1.2. **Triennial inventory.** Every third year by April 30, if the stationary source's **PTE** [POTENTIAL TO EMIT] **for the previous calendar year does not meet any of the emission thresholds in Condition 1.1.** [(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 OF ACTUAL PB, OR

(ii) 1,000 TPY OF CO; OR

(iii) 100 TPY OF SO_2, NH_3, PM_{10}, $PM_{2.5}$, NO_X, OR VOC.

b. FOR STATIONARY SOURCES LOCATED IN NONATTAINMENT AREAS:

(i) 0.5 TPY OF ACTUAL PB; OR

(ii) 1,000 TPY OF CO OR, WHEN LOCATED IN A CO NONATTAINMENT AREA, 100 TPY OF CO; OR

(iii) 100 TPY OF SO_2, NH_3, PM_{10}, $PM_{2.5}$, NO_X, OR VOC; OR AS SPECIFIED IN CONDITIONS 1.1.a(iv) THROUGH 1.1.a(viii);

(iv) 70 TPY OF SO_2, NH_3, $PM_{2.5}$, NO_X, OR VOC IN $PM_{2.5}$ SERIOUS NONATTAINMENT; OR

(v) 70 TPY OF PM_{10} IN PM_{10} SERIOUS NONATTAINMENT AREAS; OR

(vi) 50 TPY OF NO_X OR VOC IN O_3 SERIOUS NONATTAINMENT AREAS; OR

(vii) 25 TPY OF NO_X OR VOC IN O_3 SEVERE NONATTAINMENT AREAS; OR

(viii) 10 TPY OF NO_X OR VOC O_3 EXTREME NONATTAINMENT AREAS.]

1.3. For reporting under Condition 1.2, the Permittee shall report the annual emissions and the required data elements under Condition 1.4 every third year for the previous calendar year as scheduled by the EPA.[1]

1.4. For each emissions unit and the stationary source, include in the report the required data elements[2] contained within the form included in the Emission Inventory Instructions available at the Department's Air Online Services (AOS) system on the Point Source Emission Inventory webpage at <*webpage*>.

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

2. <u>Consistency of Reporting Methodologies. Regardless of permit classification, as of September 7, 2022, all stationary sources operating in the state shall report actual emissions to the Department, either upon request or to meet individual permit requirements, in order for the state to meet federal reporting requirements under 40 C.F.R. Part 51, Subpart A.</u>

2.1. **<u>For the purposes of reporting actual or assessable emissions required under Condition 1 and Condition *<insert condition number for SPC I.1.2 – Emission*</u>**

[1] The calendar years for which reports are required are based on the triennial reporting schedule in 40 C.F.R. 51.30(b)(1), which requires states to report emissions data to the EPA for inventory years 2011, 2014, 2017, 2020, and every 3rd year thereafter. Therefore, the Department requires Permittees to report emissions data for the same inventory years by April 30 of the following year (e.g., triennial emission inventory report for 2020 is due April 30, 2021, triennial emission inventory report for 2023 is due April 30, 2024, etc.).

[2] The required data elements to be reported to the EPA are outlined in 40 C.F.R. 51.15 and Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A.

***Fees*>, the Permittee shall use consistent pollutant-specific emission factors and calculation methods for all reporting requirements for the stationary source.**

[18 AAC 50.040(j)(4), **50.275(a) & (b),** 50.326(j)(3), 50.346(b)(8), & 50.200]
[40 C.F.R. 51.15, 51.30(a)(1) & (b)(1) and Appendix A to 40 C.F.R. 51 Subpart A]

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

Condition 1, Emission Inventory Reporting

Legal Basis: This condition requires the Permittee to submit emissions data to the state**,** so the state is able to satisfy the federal requirement to submit emission inventory data from point sources to the EPA as required under 40 C.F.R. 51.15 and 51.321. The **federal** emission inventory requirement applies to sources defined as point sources in 40 C.F.R. 51.50. **Under 18 AAC 50.275, the state also requires reporting of emissions triennially for stationary sources with an air quality permit, regardless of permit classification. This includes sources that do not meet the federal emission thresholds in Table 1 to Appendix A of 40 C.F.R. 51 Subpart A.** The state must report emissions data as described in 40 C.F.R. 51.15 and the data elements in Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A 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)). Permittees have until April 30th to compile and submit the data to the Department. To expedite the Department's process of transferring data into EPA's electronic reporting system, the Department encourages Permittees to submit the emission inventory through the Department's electronic emission inventory submission system in the Permittee Portal on the Department's Air Online Services webpage <*webpage*>. A myAlaska account and profile are needed to gain access to the Permittee Portal. Other options are to submit the emission inventory via mail, email, or fax.

Detailed instructions on completing and submitting the emission inventory and the report form are available at the Point Source Emission Inventory page <*webpage*> by clicking the Emission Inventory Instructions button. The emission inventory instructions and report form may also be obtained by contacting the Department.

To ensure that the Department's electronic system reports complete information to the National Emissions Inventory **(NEI)**, [TITLE V] stationary sources **with air quality permits** are required to submit with each report emissions data described in 40 C.F.R. 51.15 and the data elements in Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A, as applicable. Title V stationary sources with potential annual emissions greater than or equal to any of the emission thresholds shown in Condition 1.1 for Type A (large) sources, as listed in Table 1 to Appendix A of 40 C.F.R. 51 Subpart A, are required to report emission inventory data every year for the previous calendar year (also known as the inventory year). For triennial inventory years, Type A sources only need to submit one report, not both an annual report and a separate triennial report.

Stationary sources with air quality permits (these exclude owner requested limits (ORLs) issued under 18 AAC 50.225 and preapproved emission limits (PAELs) issued under 18 AAC 50.230) that do not meet any of the emission thresholds in Condition 1.1 for Type A (large) sources [TITLE V STATIONARY SOURCES WITH POTENTIAL ANNUAL EMISSIONS GREATER THAN OR EQUAL TO ANY OF THE EMISSION THRESHOLDS FOR TYPE B (SMALL) SOURCES SHOWN IN CONDITION 0 (FOR ATTAINMENT AND UNCLASSIFIABLE AREAS) AND CONDITION 0 (FOR NONATTAINMENT AREAS), AS LISTED IN TABLE 1 TO APPENDIX A OF 40 C.F.R. 51 SUBPART A,] are required to report emission inventory data every third year (i.e., triennially) for the previous inventory year **under Condition 1.2**. [THE EMISSION THRESHOLDS FOR NONATTAINMENT AREAS LISTED IN CONDITION 1.2.B VARY DEPENDING ON THE NONATTAINMENT STATUS OF THE AREA. AS OF JUNE 9, 2017, FAIRBANKS AND NORTH POLE URBAN AREA HAVE BEEN DESIGNATED BY THE FEDERAL ADMINISTRATOR AS "SERIOUS NONATTAINMENT" FOR PM2.5. THEREFORE, A STATIONARY SOURCE LOCATED IN FAIRBANKS AND NORTH POLE URBAN AREA IS SUBJECT TO THE TRIENNIAL REPORTING REQUIREMENT IF ITS POTENTIAL TO EMIT IS GREATER THAN OR EQUAL TO 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).]

As of the issue date of this permit, the <*enter the stationary source name*> is **required to report under <*enter Condition 1.1 for "Type A" sources or Condition 1.1.a(viii) for other stationary sources*>** [A <*ENTER "TYPE A", "TYPE B", OR "NONATTAINMENT AREA", AS APPLICABLE*> STATIONARY SOURCE].

Condition 2, Consistency of Reporting Methodologies

Legal Basis: Condition 2 is from 18 AAC 50.275(a) and requires all stationary sources, regardless of permit classification (with the exception of owner requested limits (ORLs) issued under 18 AAC 50.225 and preapproved emission limits (PAELs)) issued under 18 AAC 50.230), to report actual emissions to the state so that the state can meet its obligation under 40 C.F.R. 51. Condition 2.1 is from 18 AAC 50.275(b) and requires consistency on the stationary sources' actual emissions reports submitted for NEI and the state's assessable emissions.

Factual Basis: The regulation was added to 18 AAC 50 on September 7, 2022, so as to include all stationary sources required to report actual emissions for the purpose of federal emissions inventory and to avoid inconsistencies in actual emissions reports submitted. When reporting actual emissions under Condition 1 or assessable emissions under Condition <*insert condition number for SPC I.1.2 – Emission Fees*>, consistent emission factors and calculation methods shall be used for all reporting requirements for the stationary source.