

**ALASKA DEPARTMENT OF ENVIRONMENTAL
CONSERVATION**

**Standard Operating 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 Operating 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, by emissions [EMISSION] unit, of CO, NH₃, NO_x, PM₁₀, PM_{2.5}, SO₂, VOCs, and lead [LEAD] (Pb) (and lead compounds) using the form in [SECTION] <[INSERT PERMIT] cross-reference section number for SPC XVI – Emission Inventory Reporting Form> of this permit, as follows:
 - 1.1. 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 VOCs; or
 - b. 2,500 TPY of CO, NO_x, or SO₂.
 - 1.2. 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. 0.5 TPY [.5 TONS PER YEAR] of actual [LEAD ([Pb])], or
 - b. 1,000 [1000] TPY of CO; or
 - c. 100 TPY of SO₂, NH₃, PM₁₀, PM_{2.5}, NO_x, or VOCs.
 - 1.3. For reporting under Condition 1.2, the Permittee shall report [IN 2015 FOR CALENDAR YEAR 2014, 2018 FOR CALENDAR YEAR 2017, 2021 FOR CALENDAR YEAR 2020, ETC.,] in < enter years that comply with EPA's schedule (e.g., reports required in 2018 for calendar year 2017, 2021 for calendar year 2020, etc.) > in accordance with the Environmental Protection Agency [SET] schedule.

- 1.4. Include in the report required by this condition, the required data elements contained within the form in <cross-reference section number for SPC XVI – Emission Inventory Reporting Form [INSERT SECTION OF EMISSION INVENTORY FORM]> or those contained in Tables 2a and 2b [TABLE 2A] of Appendix A to Subpart A of 40 C.F.R. 51 and Emission Inventory Instructions available in Air Online Services (AOS) for each [STACK ASSOCIATED WITH AN] emissions [EMISSION] unit.
- a. Submit the report through electronic online submission via the Department’s Air Online Services (AOS) system at <http://dec.alaska.gov/applications/air/airtoolsweb> using the Point Source Emission Inventory option.
- b. If the AOS system is not available, the report may be submitted by
- (i) email under a cover letter using dec.aq.airreports@alaska.gov; or
- (ii) hard copy to the following address: ADEC Air Permits Program, ATTN: Emissions Inventory, 555 Cordova Street, Anchorage, Alaska 99501.

[18 AAC 50.346(b)(8), 50.326(j)(3), [AND 18 AAC] & 50.200]
[[40 CFR 51.15, 51.30(a)(1) & (b)(1) AND 40 CFR 51, APPENDIX A TO SUBPART A, [73 FR 76556 (12/17/08)]]]

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 in Table 2A 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. 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.

The emission inventory data is due to EPA 12 months after the end of the reporting year (40 C.F.R.CFR 51.30(a)(1) and (b)(1)[, 12/17/08]). Permittees have four months to compile and submit the data to the Department, but the [A DUE DATE OF] April 30th due date provides [PRESSURES THE DEPARTMENT TO HAVE SUFFICIENT] scant time for the Department to transfer [ENTER] the data into EPA's electronic reporting system. [THEREFORE] To expedite the process, the Department, therefore, 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 Point Source Emission Inventory under Air Online Services (<http://dec.alaska.gov/applications/air/airtoolsweb>). This website provides the instructions and emission inventory report forms required by this condition. A detailed instruction on development and submission of the Emission Inventory is available at the following address <http://dec.alaska.gov/Applications/Air/airtoolsweb/PointSourceEmissionInventory> by clicking Emission Inventory Instructions button.

Actual measurement with continuous emissions monitoring systems (CEMS) is the preferred method of calculating emissions from a source. If CEMS data is not available, other means for determining actual emissions may be utilized, such as an enforceable test method described in 18 AAC 50.220, material balance calculations, emission factors from EPA's AP-42, or other methods and calculations approved by the Department, including appropriate vendor-provided emissions factors when sufficient documentation is provided. If necessary, detailed sample calculations representative of the processes may be submitted with the emission inventory, thus, providing verifiable reported emissions and eliminating the need for additional information requests.

[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 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 required for the Type B source triennial reports (see also **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 a single type of report every year instead of both an annual report and a separate triennial report every third year.