

**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 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. 51.20.

Permit Wording:

1. **Emission Inventory Reporting.** The Permittee shall submit to the Department reports of actual emissions, by emission unit, of CO, NH₃, NO_x, PM₁₀, PM_{2.5}, SO₂, VOCs and Lead (Pb) (and lead compounds) using the form in Section *<insert permit section number>* 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. 2500 TPY of CO, NO_x or SO₂.
 - 1.2. Every third year by April 30 if the stationary source's potential to emit for the previous calendar year equals or exceeds:
 - a. 5 tons per year of actual lead (Pb), or
 - b. 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 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 *<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.

[18 AAC 50.346(b)(8) 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 to satisfy the federal requirement to submit emission inventory data from point sources as required under 40 C.F.R. 51.321. It applies to sources defined as point sources in 40 C.F.R. 51.20. The 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 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). A due date of April 30 pressures the Department to have sufficient time to enter the data into EPA's electronic reporting system. Therefore permittees should consider submitting the emission inventory through Air Online Services, 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 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 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.