

**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**

## Standard Permit Condition XV – Emission Inventory Reporting

**Stationary Source Categories This Condition Applies to:** All stationary sources defined as point sources in 40 CFR 51.20.

### Permit Wording:

- 1. Emission Inventory Reporting.** The Permittee shall submit to the Department reports of actual emissions, by emission unit, of CO, NH<sub>3</sub>, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, 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 March 31, if the stationary source's potential to emit emissions for the previous calendar year:
    - a. equal or exceed 250 tons per year (TPY) of NH<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> or VOCs; or
    - b. equal or exceed 2500 TPY of CO, NO<sub>x</sub> or SO<sub>2</sub>.
  - 1.2. Every third year by March 31 if the stationary source's potential to emit emissions for the previous calendar year exceed:
    - a. 5 tons per year of lead (Pb), 1000 TPY of CO; or
    - b. 100 TPY of SO<sub>2</sub>, NH<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub> or VOCs.
    - c. The Permittee shall commence reporting in 2012 for the calendar year of 2011, 2015 for calendar year 2014, etc.
  - 1.3. 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 CFR 51 (final rule published in 73 FR 76556 (December 17, 2008)) 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>.**

### **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 CFR 51.321 (6/10/02). It applies to sources defined as point sources in 40 CFR 51.20. The State must report all data elements in Table 2A of Appendix A to Subpart A of 40 CFR 51 to EPA (73 FR 76556).

**Factual Basis:** The emission inventory data is due to EPA 12 months after the end of the reporting year (40 CFR 51.30(a)(1) and (b)(1), 12/17/08). A due date of March 31 corresponds with sources reporting actual emissions for assessable emissions purposes and provides the Department sufficient time to enter the data into EPA's electronic reporting system.

The air emissions reporting requirements under 40 CFR Part 51 Subpart A apply to States; however, States rely on information provided by point sources to meet the reporting requirements of Part 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 CFR 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 CFR 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 CFR Part 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.