

Do I Need To Do An Emissions Inventory And Complete a PSDR?

The Bureau tries to notify all existing facilities it believes are required to submit an Emissions Inventory. These notifications are based on what the Emissions Inventory Section understands are the potential emissions from the facilities notified. If you have received a notification to submit an emissions inventory from us and believe that it may have been sent in error, please contact the Emissions Inventory Section to discuss. A specific contact person is usually given in the notification.

Additionally, this Bureau attempts to notify all newly permitted and newly identified Title V sources of the need to submit an Emissions Inventory.

Even though we attempt to notify everyone, we may miss a facility that is required by regulation to submit an Emissions Inventory. Therefore, the following should help answer this question for those facilities that we have failed to notify:

(Note: Emissions from non-fugitive and fugitive sources (except vehicle engine emissions) are to be used when determining a facility's "Inventory Source Type" and when reporting a facility's emissions to the Department.)

1. All newly permitted and constructed Title V Sources which have obtained or are in the process of obtaining a Title V permit and all newly permitted and constructed NAA Sources must complete and submit to the Department an initial emissions inventory for the source's first partial calendar year of operation and an emissions inventory for the source's first full calendar year of operation.

The partial year emissions inventory must be submitted to the Department no later than March 31 of the year following the source's partial year of operation and must include an emissions inventory from the source's operation start date through December 31 of the same year.

The first full calendar year emissions inventory must be submitted to the Department by March 31 of the year following the source's first calendar year of operation.

These sources shall then submit future emissions inventories on the schedule as described in paragraph B.1.a, paragraph B.1.b, and paragraph B.1.c of Regulation 61-62.1, Section III.

(Note: These Title V sources are any new facility that has been issued a construction permit(s) that require the facility to submit a Title V permit application. These NAA sources are new facilities that have been issued a construction permit and whose potential emission meet any of the applicable threshold requirements listed in the Table 1 below.)

2. Any existing sources that are determined by the Department to be subject to Regulation 61-62.70, Title V Operating Permit Program, and/or NAA Sources must complete and submit to the Department an emissions inventory for the previous calendar year within ninety (90) days. These sources must then submit future emissions inventories on the schedule as described in paragraph B.1.a, paragraph B.1.b, and paragraph B.1.c of Regulation 61-62.1, Section III.

(Note: This would include any existing non-Title V facility that has been determined to emit more than the emissions thresholds that require the submittal of a Title V permit application or any existing non-Title V facility that has been issued a construction permit(s) that require the facility to submit a Title V permit application. It would also include any existing source that has been issued a construction permit whose potential or actual emissions would meet any of the applicable threshold requirements listed in the Table 1 or Table II below after the modification.)

3. Reporting frequencies for Type A are found in Table I below.

a. Type A Sources are Title V Sources with potential annual emissions greater than or equal to any of the emission thresholds listed for Type A Sources in Table 1 below. Type A Sources must submit an emissions inventory every year.

Table 1 - Minimum Point Source Reporting Thresholds by Pollutant (tons per year)		
Pollutants	Type A Sources: Annual Cycle	Potential¹ or Actual²
SO _x	≥2500	Potential
VOC	≥250	Potential
NO _x	≥2500	Potential
CO	≥2500	Potential
Pb	≥0.50 ²	Actual
PM ₁₀	≥250	Potential
PM _{2.5}	≥250	Potential
NH ₃	≥250	Potential

¹ Tons per year (tpy) potential to emit means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, will be treated as part of its design if the limitation is enforceable by the Administrator and included in the source's permit prior to the end of the reporting year.

² The EPA considers that the ambient monitoring rule threshold is 0.5 tons of actual emissions; therefore, this criterion is based on actual emissions rather than the potential-to-emit approach taken for other criteria pollutant and precursor thresholds.

b. All other Title V Sources with potential annual emissions less than the emission thresholds listed for Type A Sources in Table 1 above must submit emissions inventories every three (3) years beginning with calendar year 2014 data.

c. Nonattainment area (NAA) Sources are sources located in a NAA with potential annual emissions during any year of the three (3) year cycle greater than or equal to any of the emission thresholds listed for NAA Sources in Table 2 below. These sources that are not also Type A Sources must submit emissions inventories every three (3) years beginning with calendar year 2014 data.

Table 2 - Minimum Point Source Reporting Thresholds by Pollutant (tons per year)		
Pollutant	NAA³ Sources: Three-year Cycle	Potential¹ or Actual²
SO _x	≥100	Potential
VOC	≥100 (moderate O ₃ NAA)	Potential
	≥50 (serious O ₃ NAA)	
	≥25 (severe O ₃ NAA)	
	≥10 (extreme O ₃ NAA)	
NO _x	≥100 (all O ₃ NAA)	Potential
CO	≥100 (all O ₃ NAA)	Potential
	≥100 (all CO NAA)	
Pb	≥0.50	Actual
PM ₁₀	≥100 (moderate PM ₁₀ NAA)	Potential
	≥70 (serious PM ₁₀ NAA)	
PM _{2.5}	≥100	Potential
NH ₃	≥100	Potential

¹ Tons per year (tpy) potential to emit means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, will be treated as part of its design if the limitation is enforceable by the Administrator and included in the source's permit prior to the end of the reporting year.

² The EPA considers that the ambient monitoring rule threshold is 0.5 tons of actual emissions; therefore, this criterion is based on actual emissions rather than the potential-to-emit approach taken for other criteria pollutant and precursor thresholds.

³ Special point source reporting thresholds apply for certain pollutants by type of NAA. The pollutants by nonattainment area are:
Ozone: VOC, NO_x, and CO;
Carbon Monoxide: CO; and
Particulate matter less than 10 microns: PM₁₀.

4. Submittal of emissions inventories outside of the schedules in this section will be accepted and reviewed only if a modification has occurred that required issuance of an air quality permit since the last emissions inventory submittal by the source. This modification must alter the quantity or character of the source's emissions. These sources may submit a new emissions inventory following the first full calendar year of operation after the modification. These sources must then submit future emissions inventories on the schedule described in paragraph B.1.a, paragraph B.1.b, and paragraph B.1.c of Regulation 61-62.1, Section III.

5. Details as to what is required to be submitted as part of an Emissions Inventory can be found in Regulation 61-62.1 Section III as amended.

6. Unless otherwise indicated, all emissions inventories shall be submitted to the Department by March 31 following the year of inventory. All applicable information will be recorded on the current format for reporting emissions data as provided by the Department.