

## Annual Emissions Report Discussion

### ORR Recommendation A-19

Continue to use the existing default MAERS air toxics emission factors as an optional calculation tool for industry, but clearly identify which air toxics have been calculated using USEPA-supplied emission factors in the annual MAERS reports. Furthermore, the DEQ should be prohibited from developing new air toxics rules using D and E-rated emission factors.

### Analysis

A Source subject to this emission reporting submits a report via the Michigan Air Emissions Reporting System (MAERS). Emissions for some pollutants are required to be reported, while for other pollutants it is optional. For all pollutants required to be reported, MAERS provides users with emission factors they may choose to use in calculating emission estimates, in lieu of other acceptable data. The pollutants that require reporting are determined by the MAERS system based on the type of activities the Source is reporting and available emission factors. For reporting purposes, the only pollutants that could be required are Ammonia, CO, Lead, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and/or VOC, as these are considered criteria pollutants or criteria pollutant precursors.

Currently, the MAERS system also allows a Source to report up to 254 other non-criteria optional pollutants. The submission of these other non-criteria pollutants emission estimates is voluntary. In the absence of emission estimates provided by the Source, the AQD is obligated to generate estimates for some of these pollutants as part of their emissions inventory commitments to USEPA. The Source reported activities and available emission factors will determine when an emission estimate is generated by the AQD. A user of the MAERS system can review the non-criteria emission estimates generated by the MAERS system for a particular Source by reviewing available data reports in the MAERS system.

### Recommendation

The MAERS system will continue to generate criteria and non-criteria emission estimates and in the absence of Source reported emission estimates for non-criteria pollutants, the available MAERS emission factors will be utilized to generate emission estimates. The system generated estimates will continue to be displayed to the MAERS system users through the available reports in the MAERS system. An online tutorial regarding the available MAERS system reports is now available at this link [http://www.michigan.gov/deq/0,4561,7-135-3310\\_4103\\_4193-229444--,00.html](http://www.michigan.gov/deq/0,4561,7-135-3310_4103_4193-229444--,00.html).