

# Annual Emissions Reporting

Update, February 20, 2013

## 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.

## Response Summary

The AQD staff has provided the following in response to this recommendation and the Air Advisory Council discussion of this issue.

- A tutorial for MAERS reporting users has been developed, instructing users what reports are available. This includes the emission unit-specific report that displays the emission estimates generated by MAERS-supplied emission factors, in contrast to user-submitted emission estimates. A sample comparison report and a link to the tutorial were provided for the October 31, 2012 and December 12, 2012 meetings, respectively. Concern was expressed about the general public seeing this report. This report is only available to MAERS reporting users. The AQD receives about four FOIA requests per year for emissions information. No request has included this report.
- Concern was expressed about MAERS emission factors that are not based on those in the WebFire database (i.e., USEPA emission factors). We have been able to quickly map 91% of the MAERS emission factors back to the current WebFire database. The remaining 9% of the emission factors will take a little more time to evaluate, but it is expected that nearly all of these will also be determined to have been derived from WebFire factors.
- Council members inquired as to the cost to highlight toxic emission estimates that have been calculated using non-WebFire emission factors. To obtain a formal cost estimate from DTMB, a formal work request must be submitted and funded. The work request would cost approximately \$1,000 and not be DTMB's highest priority. Based on prior cost estimates for MAERS enhancements, the AQD's rough cost estimate for the highlighting software changes is around \$12,000. No time estimate is available. In light of the fact that almost all of MAERS emission factors are currently known to be based on WebFire and the expectation that most of the rest will also be determined to be WebFire-based

well before such software could be implemented, such highlighting may be of limited value.

- Council members asked for our specific grant commitment to report annual emissions to EPA. This was provided for the October 31, 2012 meeting.
- We were asked to provide the list of compounds EPA requires to be reported. A list is being provided to accompany this update. There are 359 active compounds, with another 113 retired. EPA has been known to retire and unretire compounds, depending on the specific interests at a given time. This list is limited to the criteria pollutants and precursors and the 189 Clean Air Act HAPs, but includes many specific compounds within the definition of a more generic HAP (e.g., dioxin and furan congeners). MAERS currently has 254 toxic pollutants which are reportable, nearly all of them HAPs compounds. A few have been added to accommodate specific companies' requests (i.e., acetone, copper) so that the company could satisfy their reporting obligations through their MAERS submittal. Only those compounds on EPA's list are reported to EPA.
- While not part of the ORR recommendation, concern has been expressed about the number of toxic air contaminant (TAC) emission estimates included in staff analyses prepared for public comment and hearings on New Source Review permit applications. A comment was made that a shorter list is more appropriate, one that presents those TACs of most concern or those that are closest to their respective health protective standards. The AQD is cognizant of what data is presented for public review and has made adjustments to the TAC emission tables so that they are focused on those TACs of most concern. All TACs are still reviewed as part of the permit review process and more detailed data is available in the permit file.
- Air toxics rules are not developed using D or E-rated emission factors, or any emission factors.

### **Conclusion**

The AQD continues to provide the MAERS emission factors as an alternative means for MAERS users to calculate emissions. MAERS provides a comparison report to MAERS users that delineates between company-supplied and MAERS-derived emissions. A tutorial has been provided to demonstrate how to obtain this report. Almost all MAERS emission factors are based on WebFire and the AQD reports to EPA only those toxic pollutants that are included in EPA's database. Emission factors are not used in developing air toxics rules.

ORR Recommendation A-19 has been fully addressed.