AIR QUALITY DIVISION POLICY AND PROCEDURE

AQD-013
Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory

Original Effective Date: November 25, 1996
Last Revision Date: July 22, 2020
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ISSUE

Michigan Air Pollution Control R 336.202 (Rule 2) requires an annual report from a commercial, industrial, or governmental source of emission of an air contaminant, if in the judgment of EGLE, information on the quantity and composition of an air contaminant emitted from the source is considered by EGLE as necessary for the proper management of the air resources. In addition, Air Pollution Control R 336.1212 (Rule 212) contains emission reporting requirements.

In the past, nearly every permitted source was added to the point source emissions inventory (point inventory). In addition, many sources without permits (grandfathered) were included. The point inventory source population peaked in 1994 with over 14,000 sources. A considerable effort has been put into improving the quality of the data in the point source emissions inventory and continued maintenance of the point inventory remains resource intensive for both the department and the sources that report the emissions information. As a result of implementation of this policy over the years since it was first adopted, the 2019 point inventory contains approximately 1,700 sources.

This policy and procedure is intended to provide guidance to Air Quality Division (AQD) staff as to what sources should be included in the point inventory to fulfill the requirements of Rule 2. The goal is to include: (1) sources that are specifically required to report emissions or compliance status in accordance with an Air Pollution Control Rule or federal Clean Air Act (CAA) requirement; (2) sources that are determined to be a Category A through Category D fee-subject facility; (3) sources that have obtained and are operating under an “Opt-out Permit” (Category E fee-subject facility); and (4) sources that emit sufficient quantities of air contaminants to warrant their inclusion in the point inventory for the proper management of the air resources and support the State Implementation Plan (SIP).

AUTHORITY

The federal CAA, 42 United States Code (U.S.C.) 7401; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

STAKEHOLDER INVOLVEMENT

The Air Advisory Council participated in the original action for this policy and procedure.

DEFINITIONS

Emission, Reporting & Assessment Unit (ERAU) – A unit in the Air Quality Evaluation Section of AQD responsible for overseeing emissions reporting.

Michigan Air Emissions Reporting System (MAERS) – Currently, a web-based application for reporting annual emission reports by sources required to report pursuant to Rule 212. The data submitted to MAERS is the basis for the AQD's point inventory.

State Registration Number (SRN) – A unique identifier used by the AQD to identify single stationary sources.

Environmental Assistance Center (EAC) – Located in EGLE, Environmental Support Division and provides direct one-on-one assistance or a referral to program staff within EGLE.

Opt-out Permit – A permit to install issued to a source which establishes emission and operational limits, enforceable by the AQD and/or the United States Environmental Protection Agency (USEPA), to reduce a source's potential to emit to below the major source thresholds and therefore allows the source to avoid the requirements of the Renewable Operating Permit (ROP) program. {See Policy and Procedure AQD-004}

PM – All filterable Particulate Matter, there is no size differentiation. PM does not include condensable emissions. PM_{10} and $PM_{2.5}$ filterable emissions cannot be greater than PM for the same activity.

PM_{10} – Particulate Matter equal to or less than 10 microns in diameter. The size denoted refers to filterable particulate matter, which may be equal to or less than the Particulate Matter emission levels for the same activity. PM_{10} also includes condensable emissions. Primary PM_{10} emissions are the sum of filterable and condensable emissions. The condensable emissions are always equivalent for PM_{10} and $PM_{2.5}$.

$PM_{2.5}$ – Particulate Matter equal to or less than 2.5 microns in diameter. The size denoted refers to filterable particulate matter, which may be equal to or less than the Particulate Matter or PM_{10} emission levels for the same activity. $PM_{2.5}$ also includes condensable emissions. Primary $PM_{2.5}$ emissions are the sum of filterable and condensable emissions. The condensable emissions are always equivalent for PM_{10} and $PM_{2.5}$.

POLICY

Sources with actual emissions expected to be greater than any of the following emission thresholds will be notified to report emissions annually:

- Carbon Monoxide = 100 tons per year (TPY)
- Nitrogen Oxides = 40 TPY (25 TPY for sources in Ozone Nonattainment areas, see below)
- Sulfur Dioxide = 40 TPY
- PM = 25 TPY
- PM_{10} = 15 TPY*
- $PM_{2.5}$ = 10 TPY*
- Volatile Organic Compounds (VOC) = 10 TPY
- Lead (Pb) = 0.5 TPY

These thresholds are based on the significant levels defined in Air Pollution Control Rule R 336.1119(e) with the exception of VOC and Pb. The VOC threshold is based on the major source definition for a single hazardous air pollutant in Section 112 of the federal CAA. The Pb threshold is based on the lead ambient monitoring requirements (Title 40 of the Code of Federal Regulations (CFR) Part 58 Appendix D). In addition, sources that are specifically required to report emissions or compliance status in accordance with an Air Pollution Control Rule or federal CAA requirement, sources that have an active Opt-out Permit, and sources that are considered Category A through Category E Fee-subject sources pursuant to Act 451 will be included in the point inventory.

Additionally, in conformance with Section 182 of the CAA, sources in Ozone Nonattainment Areas will be notified to report annual emissions if they have actual emissions over 25 TPY of nitrogen oxides.

*PM_{10} and $PM_{2.5}$ should be reported as Primary whenever possible. Primary is equal to filterable and condensable emissions summed together, unless specified otherwise. As applicable, also report filterable and condensable emissions and indicate the type.

Once a source triggers the need to report for any pollutant, that source must report for all pollutants listed above, and as applicable for the associated activity code.

PROCEDURE

Step	Who	Does What
Step 1 – SRN Assignment	Field Operations/ Permits Section	Upon becoming aware of a source which will be of ongoing regulatory interest, requests an SRN be assigned. The request is submitted to the MAERS Coordinator and includes facility name; and location of the facility, including address, city, county, and ZIP code; facility contact, contact's email address, and telephone number.
	MAERS Coordinator	Verifies the address/facility does not already have an SRN assigned and issues an SRN. In accordance with the policy above, a preliminary determination is made, based on input from District Staff as to whether the source will be required to submit a MAERS report in the coming year. The MAERS Flag in MAERS is set accordingly.
Step 2 – Master List Generation	MAERS Coordinator	During November each year, the preliminary Master List is populated with sources that have a MAERS Flag set to Y- yes or U - undecided. Once populated and quality assured, the MAERS Coordinator notifies District Staff that the Master List is available for review and approval.
Step 3 – Master List review and finalization	Field Operations/ District Supervisors	Upon notification by the MAERS Coordinator, the Master List is reviewed by District Staff. Sources are added or removed based on the criteria set forth in the Policy above and in consultation with the District Supervisor.
Step 4 – Master List finalization	District Supervisors or designee	Review and approve each District's final Master List. Any sources not required to report should be removed from the Master List prior to approving each District's Master List. Any source remaining on the Master List will receive notification that they are required to complete a MAERS report. Master Lists are expected to be finalized each year by December 20.

Step	Who	Does What
Step 5 – Notification of MAERS sources	MAERS Coordinator	A minimum of 3 attempts to electronically notify (email) sources of their obligation to submit a MAERS report shall be made. Any sources that have not confirmed receipt of the electronic notifications by January 23 shall be processed for paper notification. All notifications shall be completed by January 29 each year. Notifications (electronic or paper) will provide the source with the necessary resources to complete their MAERS reports in an efficient manner and are customized depending on whether or not the source has reported before.
Step 6 – Customer Service	ERAU, Field Operations, EAC	EGLE will provide the necessary staff with resources to assist the sources in completing and submitting their MAERS reports. For the most part, this customer service will be facilitated through the MAERS Coordinator.
Step 7 – Review and Audit of Submitted Reports	Field Operations	Upon submittal, and prior to June 1, MAERS reports assigned for audit will be reviewed for errors. Sources are assigned for audit at the District Supervisors' discretion, while accounting for workload and resource considerations.
Step 8 – Statewide QA	ERAU	After the District Staff have completed the audits of the MAERS reports and prior to the population of next year's Master List, a statewide quality assurance of the submitted data is completed. This effort looks at the annual data as a whole, and identifies data outliers and data that is beyond acceptable ranges. The ERAU will identify and correct data where the correction is obvious; the ERAU will work with District Staff and/or the source to verify or correct data where a correction is not obvious.
Step 9 – Annual Point Source Inventory Submittal to USEPA	ERAU	Before January 1 of the following year, the ERAU will finalize the point inventory and generate the files necessary to submit a facility and point inventory to USEPA's Emissions Inventory System (EIS) pursuant to 40 CFR Part 51 (i.e., 2019 data is submitted to the EIS before January 1, 2021). All data submitted by a source is processed through the audit and statewide quality assurance process, and is submitted to the USEPA as part of Michigan's official Point Source Emissions Inventory. The finalized Point Source Emissions Inventory is also made available to the general public online via download and through FOIA.

This Policy and Procedure document is intended to provide guidance to AQD staff to foster consistent application of Part 55 of Act 451 and the administrative rules promulgated thereunder. This document is not intended to convey any rights to any parties nor create any duties or responsibilities under law. This document and matters addressed herein are subject to revision.

LINKS TO ADDITIONAL INFORMATION

The Fee Calculations website provides information on the different fee categories and how fees are assessed.

The MAERS User Guide references this document and provides guidance on how to report the emissions once the need to report has been triggered.

Policy and Procedure AQD-004 is entitled Mechanisms for Limiting the Applicability of Michigan's Renewable Operating Permit Program. It is referenced above in the definition of an Opt-out Permit.

APPROVING AUTHORITY

Mary Ann Dolehanty, Director
Air Quality Division

HISTORY

Policy No.	Action	Date	Title
Operational Memorandum AQD-13	Original	11/25/1996	Criteria Pollutant Threshold Levels For The Point Source Emissions Inventory
Operational Memorandum AQD-13	Revised	2/14/1997	Criteria Pollutant Threshold Levels For The Point Source Emissions Inventory
AQD-013	Revised	1/29/2014	Criteria Pollutant Threshold Levels For The Point Source Emissions Inventory
AQD-013	Revised	7/22/2020	Criteria Pollutant Threshold Levels for the Point Source Emissions Inventory

CONTACT/UPDATE RESPONSIBILITY

Any questions or concerns regarding this policy and procedure should be directed to Catherine Asselin at InfoMAERS@Michigan.gov, or at 517-582-3604.

An EGLE policy and procedure cannot establish regulatory requirements for parties outside of EGLE. This document provides direction to EGLE staff regarding the implementation of rules and laws administered by EGLE. It is merely explanatory, does not affect the rights of or procedures and practices available to the public, and does not have the force and effect of law. EGLE staff shall follow the directions contained in this document.