



## AIR QUALITY DIVISION POLICY AND PROCEDURE

### AQD-013 – Air Emissions Reporting Process Requirements

Effective Date: November 25, 1996  
Revision Date: February 7, 2024  
Distribution: External/Non-interpretive

#### ISSUE

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Michigan Air Pollution Control Rule 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 necessary for the proper management of the air resources. In addition, R 336.1212 (Rule 212), contains emission reporting requirements.

In the past, nearly every permitted source was required to report emissions annually. This annual reporting created the emissions inventory. In addition, many sources that had equipment installed before August 15, 1967 (grandfathered), and others exempt from permitting were required to report. The number of reporting facilities peaked in 1994 with over 14,000 sources. Since that time, considerable effort has been put into improving the quality of the data in the emissions inventory and through the implementation of this policy over the years. As a result, at the time of this revision, the inventory contains over 1,700 sources.

This policy and procedure guides Air Quality Division (AQD) staff about which sources should be required to report emissions and be included in the inventory. Additionally, it is intended 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.

#### AUTHORITY

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

#### STAKEHOLDER INVOLVEMENT

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Michigan's Air Advisory Council was involved in the original drafting of this policy and procedure.

#### DEFINITIONS

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**Data Applications and Technology Support Unit (DATSU)** – A unit in the AQD responsible for overseeing all aspects of MiEnviro Portal for Air.

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

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

**MiEnviro Portal (MiEnviro)** – A web-based application for reporting annual emissions by sources required to report according to Rule 2. The data submitted to MiEnviro’s emissions reporting system is the basis for the AQD’s inventory.

**Opt-out Permit** – A permit to install issued to a source that 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 program. {See [Policy and Procedure AQD-004](#)}

**PM** – All filterable particulate matter, there is no size differentiation. PM does not include condensable emissions. PM<sub>10</sub> and PM<sub>2.5</sub> filterable emissions cannot be greater than PM for the same activity.

**PM<sub>10</sub>** – 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<sub>10</sub> also includes condensable emissions. Primary PM<sub>10</sub> emissions are the sum of filterable and condensable emissions. The condensable emissions are always equivalent for PM<sub>10</sub> and PM<sub>2.5</sub>.

**PM<sub>2.5</sub>** – 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<sub>10</sub> emission levels for the same activity. PM<sub>2.5</sub> also includes condensable emissions. Primary PM<sub>2.5</sub> emissions are the sum of filterable and condensable emissions. The condensable emissions are always equivalent for PM<sub>10</sub> and PM<sub>2.5</sub>.

**State Registration Number (SRN)** – A unique identifier used by the AQD.

## **POLICY**

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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 (NO<sub>x</sub>) = 40 TPY,
- Sulfur Dioxide = 40 TPY,
- PM = 25 TPY,
- PM<sub>10</sub> = 15 TPY<sup>1</sup>,
- PM<sub>2.5</sub> – 10 TPY
- Volatile Organic Compounds (VOC) = 10 TPY<sup>2</sup>, and
- Lead (Pb) = 0.5 TPY

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<sup>1</sup> PM<sub>10</sub> and PM<sub>2.5</sub> 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.

<sup>2</sup> These thresholds are based on the significant levels defined in R 336.1119(e) except for 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 and the requirement to identify VOC point sources greater than 10 TPY in the SIP. The Pb threshold is based on the lead ambient monitoring requirements (Title 40 of the Code of Federal Regulations (CFR) Part 58 Appendix D).

Additionally, sources that are covered under any of the following circumstances will be notified to report emissions annually:

- Sources that are specifically required to report emissions or compliance status by an Air Pollution Control Rule or CAA requirement.
- Sources that are considered Category A through Category E Fee-subject sources according to Act 451.
- Sources with an “Opt-out Permit”; and
- Sources emitting enough 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).

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 NOx.

Once a source triggers the need to report for any pollutant, that source must report for all pollutants listed above.

**PROCEDURE**

Step	Who	Does What
Step 1 – SRN Assignment	Field Operations / Permits Section	Once a source is determined to be of known regulatory interest, an SRN is requested. The request is submitted to the DATSU and includes facility name; location of the facility, including address, city, county, and zip code; facility contact, contact’s email address and telephone number.
	DATSU	Verifies the address/facility does not already have an SRN assigned and issues an SRN. Per the policy above, a preliminary determination is made, based on input from district staff as to whether the source will be required to report emissions in the coming year. A reporting “permit” is added to the MiEnviro site, and the Equipment Inventory Review and the Annual Emissions Report schedules will be attached to the “permit.”
Step 2 – Emissions reporting determination	ERAU/Field Operations / District Supervisors	Sources are added or removed based on the criteria outlined in the policy above and in consultation with the district supervisor. This is done at the same time and the air quality fee sources are reviewed as detailed in <a href="#">AQD-035</a> .
Step 4 – Emissions reporting determination	District Supervisors or designee	Any sources not required to report should be removed before January 1 of the reporting year.
Step 5 – Notification to report annual air emissions	Emissions Reporting Coordinator	MiEnviro will electronically notify sources of their obligation to review their equipment inventory and report emissions. Paper notifications will be sent to any source without an associated user account. All notifications shall be completed by January 29 each year. Notifications

Step	Who	Does What
		will provide the source with the necessary resources to report their emissions efficiently.
Step 6 – Customer Service	DATSU, ERAU, Field Operations, EAC	EGLE will provide the necessary resources for sources to be able to complete and submit their emission reports in MiEnviro. These resources will include, but are not limited to a dedicated webpage ( <a href="http://Michigan.gov/egle/about/organization/air-quality/air-emissions">Michigan.gov/egle/about/organization/air-quality/air-emissions</a> ), live and recorded virtual training sessions, video tutorials, guidance documents for specific issues, and a guidebook for emissions reporting holistically, a dedicated email ( <a href="mailto:EGLE-Air-MiEnviro@Michigan.gov">EGLE-Air-MiEnviro@Michigan.gov</a> ) as well as phone access to the EAC and district staff.
Step 7 – Review and Audit of Submitted Reports	Field Operations	Upon submittal and before June 1, emissions reports assigned for audit will be reviewed for errors. Sources are automatically assigned for audit.
Step 8 – Statewide QA	ERAU	After district staff have completed the audits of the emissions reports, 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. ERAU will identify and correct data where the correction is discernable. ERAU will work with district staff and/or the source to verify or correct data where a correction is not able to be determined.
Step 9 – Annual Point Source Inventory Submittal to USEPA	ERAU	By January 1 of the following year, ERAU will finalize the point inventory and generate the files necessary to submit a facility and point inventory to the USEPA’s Emissions Inventory System according to 40 CFR Part 52. 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 public through MiEnviro and Freedom of Information Act.

## LINKS TO ADDITIONAL INFORMATION

### Rules:

- [Michigan Air Pollution Control Rule 336.202 \(Rule 2\)](#)
- [Air Pollution Control Rule, Part 2 Rules, Rule 336.1212 \(Rule 212\)](#)
- [Natural Resources and Environmental Protection Act, Part 55, Section 5522](#)

### Policies:

- [Mechanisms for Limiting the Applicability of Michigan’s Renewable Operating Permit Program AQD-004](#)

- [Waivers Affecting Fee Assessment; Closures Affecting Fee Applicability - AQD-035](#)

Webpages and webapps:

- [Air Emissions Reporting Webpage](#) contains information, training, and other resources related to MiEnviro Portal and the emission reporting process.
- [Fee Calculations website](#) provides information on the different fee categories and how fees are assessed.
- [MiEnviro Portal resource landing page](#) is where resources related to MiEnviro Portal are housed and where the webapp can be accessed.
- [MiEnviro Portal webapp](#) is a direct link to the webapp.

## APPROVING AUTHORITY

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Annette Switzer, Director  
Air Quality Division

## HISTORY

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Policy No.	Action	Date	Title
AQD-013	Original	11/25/1996	Criteria Pollutant Threshold Levels For The Point Source Emissions Inventory
AQD-013	Revised	2/14/1997	Criteria Pollutant Threshold Levels For The Point Source Emissions Inventory
AQD-013	Reformatted	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
AQD-013	Revised	2/7/2024	Air Emissions Reporting Process Requirements

## CONTACT/UPDATE RESPONSIBILITY

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Any questions or concerns regarding this policy and procedure should be directed to Catherine Asselin at [EGLE-Air-MiEnviro@Michigan.gov](mailto:EGLE-Air-MiEnviro@Michigan.gov) or at 517-582-3604.

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