

Pinal County Air Quality Control District

(PCAQCD)

§3-1-103. Annual Emissions Inventory Questionnaire and Emissions Statement

State Implementation Plan (SIP) Rulemaking

May 5, 2020



PINAL COUNTY

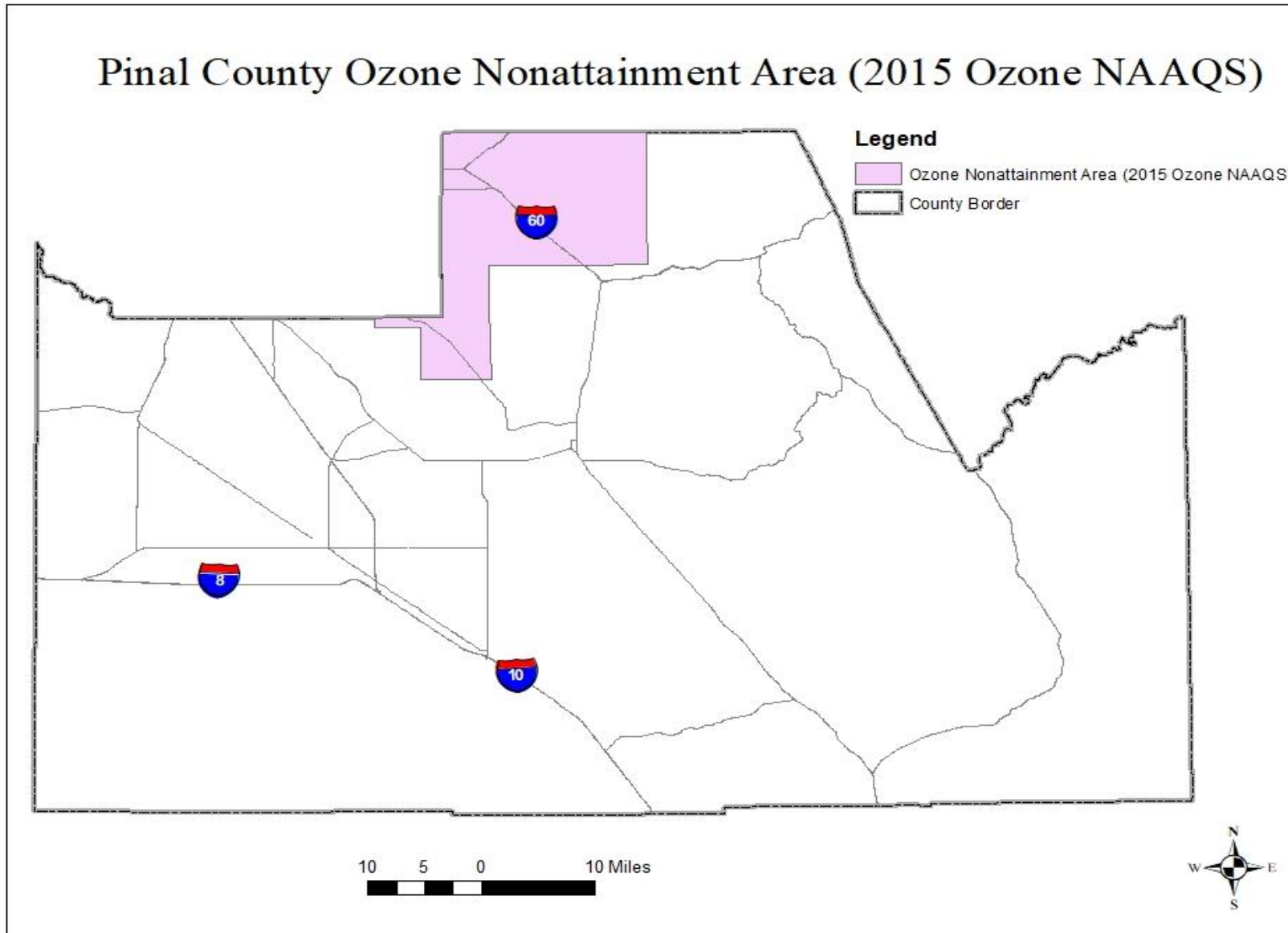
WIDE OPEN OPPORTUNITY



Why?

- Revision of Ozone Health Standard in 2015 (from 0.075 ppm to 0.070 ppm)
- Previous ozone nonattainment area [NAA] (covered the Phoenix metro and northern Pinal County) was expanded east and south in the Pinal County portion to include Gold Canyon/Queen Valley and San Tan Valley.
- The new 2015 ozone NAA was classified marginal.

2015 Ozone NAA – Pinal County Portion



Marginal Ozone NAA Requirements

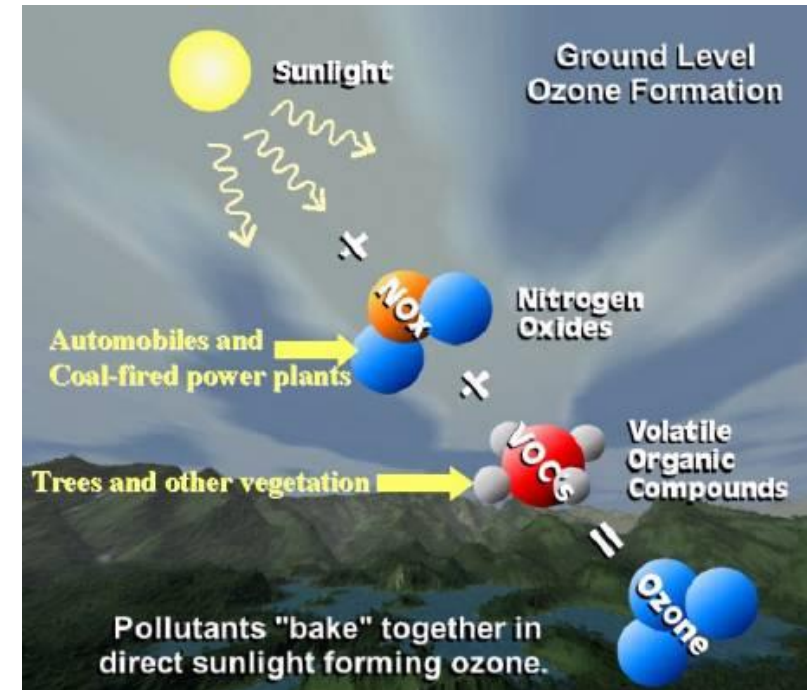
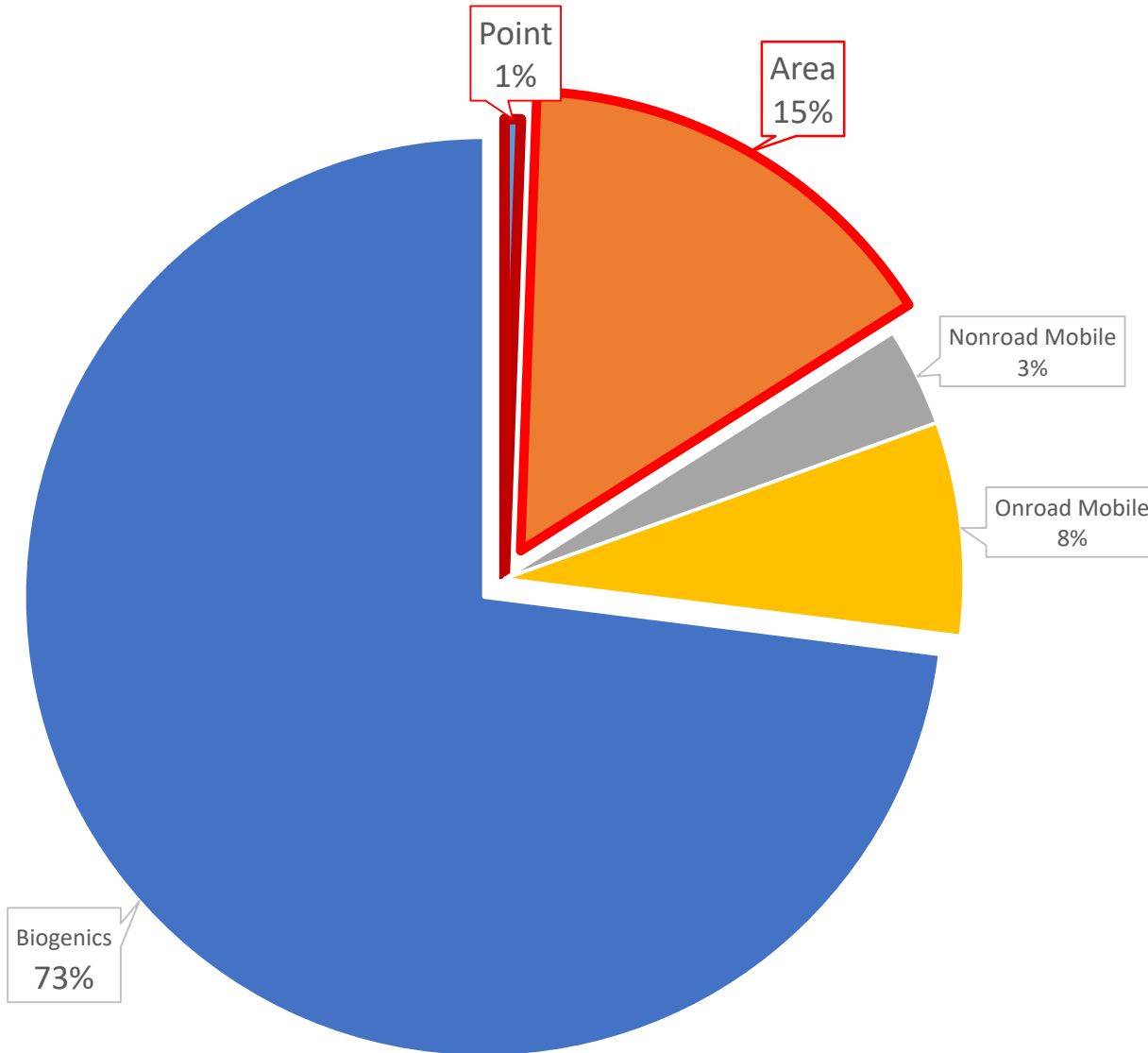
- An Emissions Statement – CAA Section 182(a)(3)(B)
- A Baseline Emissions Inventory – CAA Section 182(a)(1)
- A Periodic Emissions Inventory, No later than every three years until attainment of the standard – CAA Section 182(a)(3)(A)
- Corrections to the State Implementation Plan – CAA Section 182(a)(2)
- New Source Review – CAA Title I, Part D
- Offset Requirements – 1.1 to 1 (Ratio of Total Emissions Reductions of Volatile Organic Compounds to Total Increased Emissions) – CAA Section 182(a)(4)
- Meet Transportation Conformity Requirements – CAA Section 176(c)



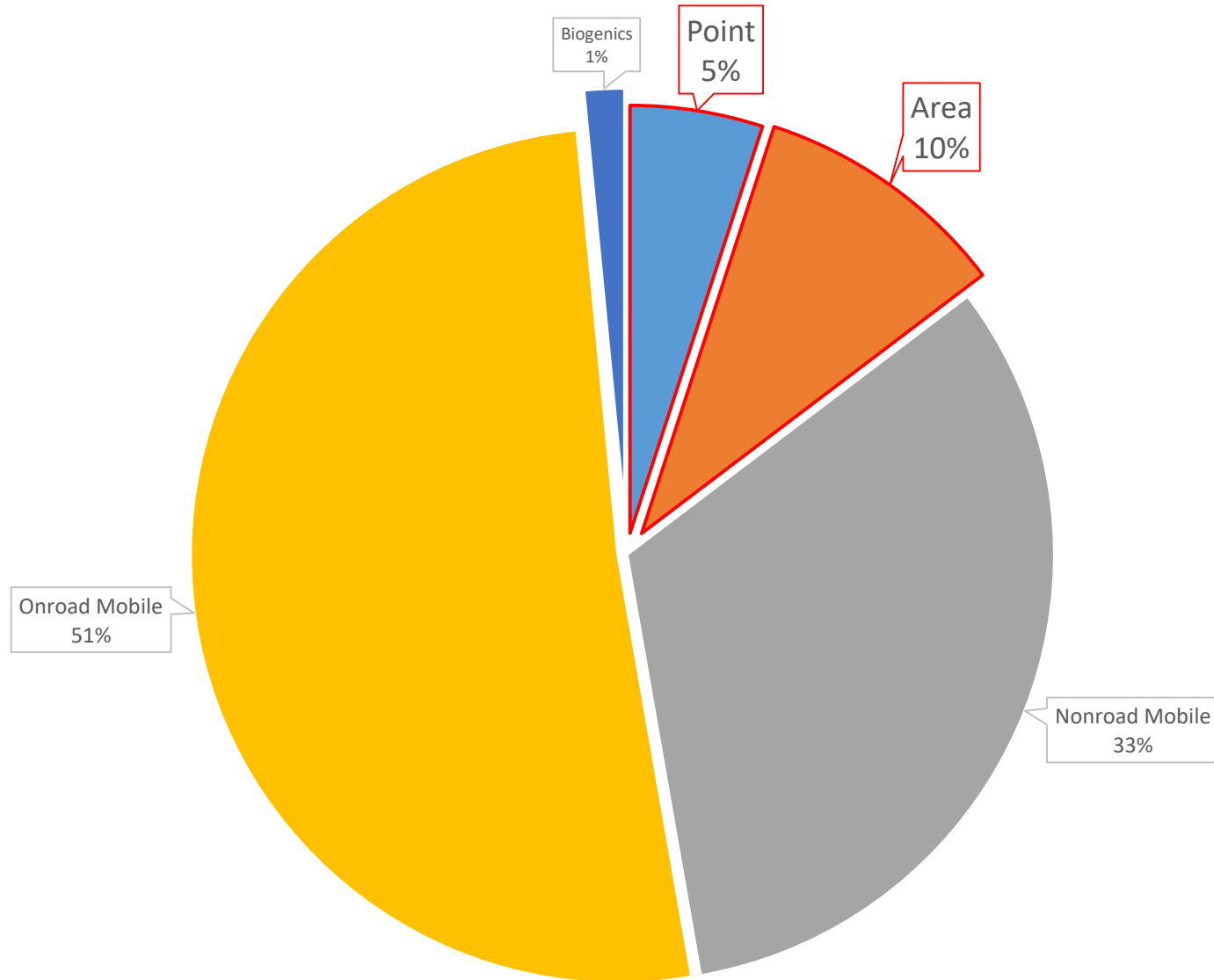
Marginal Ozone NAA Requirements (Continued)

- CAA Section 182 - **(a) Marginal Areas**
- Each State in which all or part of a Marginal Area is located shall, with respect to the Marginal Area (or portion thereof, to the extent specified in this subsection), submit to the Administrator the State implementation plan revisions (including the plan items) described under this subsection...
- **(3) Periodic inventory**
- **(B) Emissions statements**
- (i) ...the State shall submit a revision to the State implementation plan to require that the owner or operator of each stationary source of oxides of nitrogen or volatile organic compounds provide the State with a statement, in such form as the Administrator may prescribe (or accept an equivalent alternative developed by the State), for classes or categories of sources, showing the actual emissions of oxides of nitrogen and volatile organic compounds from that source. The first such statement shall be submitted within 3 years after November 15, 1990. Subsequent statements shall be submitted at least every year thereafter. The statement shall contain a certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement.
- (ii) The State may waive the application of clause (i) to any class or category of stationary sources which emit less than 25 tons per year of volatile organic compounds or oxides of nitrogen if the State, in its submissions under subparagraphs ¹ (1) or (3)(A), provides an inventory of emissions from such class or category of sources, based on the use of the emission factors established by the Administrator or other methods acceptable to the Administrator.

2017 PEI - VOC Maricopa County Ozone Nonattainment Area



2017 PEI - NOx Maricopa County Ozone Nonattainment Area





Current rule (§3-1-103)

- **3-1-103. Annual emissions inventory questionnaire**
- A. **Every source** subject to a permit requirement under this chapter, or who obtains an authorization to operate under this chapter, **shall complete and submit to the Control Officer an annual emissions inventory questionnaire**. The questionnaire is due by March 31 or ninety days after the Control Officer makes the inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. These requirements apply whether or not a permit has been issued and whether or not a permit application has been filed.
- B. The questionnaire shall be on a form provided by the Control Officer and shall include the following information:
 - 1. The source's name, description, mailing address, contact person and contact person phone number, and physical address and location, if different than the mailing address.
 - 2. Process information for the source, including design capacity, operations schedule, and emissions control devices, their description and efficiencies.
 - 3. The actual annual quantity of emissions, including documentation of the method of measurement, calculation or estimation, of:
 - a. Any single regulated air pollutant in a quantity greater than one ton.
 - b. Any combination of regulated air pollutants in a quantity greater than 2½ tons.
- C. The Control Officer may waive a requirement that specific information or data be submitted in the annual emissions inventory questionnaire for sources requiring Class II or Class III permits if the Control Officer determines that the submission or data would be unnecessary or unreasonable for a particular source or category of sources and instead may require alternative information from which emissions may be determined.
- [Adopted effective November 3, 1993. Amended February 22, 1995. Amended October 27, 2004.]
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Proposed rule changes – PCAQCD §3-1-103

- **3-1-103. Annual emissions inventory questionnaire and emissions statement**
- **A. Emissions Inventory Questionnaire and Emissions Statement Requirements**
- ~~A1.~~ Each Class I, Class II or Class III source ~~Every source~~ subject to a permit requirement under this chapter, or who obtains an authorization to operate under this chapter, shall complete and submit to the Control Officer an annual emissions inventory questionnaire and emissions statement. ~~The questionnaire and emissions statement is due~~ shall be submitted each year by March 31 or ninety days after the Control Officer makes the inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. These requirements apply whether or not a permit has been issued and whether or not a permit application has been filed.



Proposed rule changes – PCAQCD §3-1-103

- ~~B~~2. The emissions inventory questionnaire and emissions statement shall be on an electronic or paper form provided by the Control Officer and shall include the following information for the previous calendar year:
 - ~~1~~a. The source's name, description, mailing address, contact person and contact person phone number, and physical address and location, if different than the mailing address.
 - ~~2~~b. Process information for the source, including design capacity, throughput, operations schedule, and emissions control devices, their description and efficiencies.
 - ~~3~~c. The actual annual quantity of emissions, including documentation of the method of measurement, calculation or estimation, determined pursuant to subsection B, of the following regulated air pollutants:
 - ~~a~~i. Any single regulated air pollutant in a quantity greater than one ton.
 - ~~b~~ii. Any combination of regulated air pollutants in a quantity greater than 2½ tons.
 - ~~d~~. A certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.



Proposed rule changes – PCAQCD §3-1-103

- 3. An amendment to an annual emissions inventory questionnaire, containing the documentation required by subsection (A)(2), shall be submitted to the Control Officer by any source whenever it discovers or receives notice, within two years of the original submittal, that incorrect or insufficient information was submitted to the Control Officer by a previous emissions inventory questionnaire. If the incorrect or insufficient information resulted in an incorrect annual emissions fee, the Control Officer shall require the additional payment be made or shall apply an amount as a credit to a future annual emissions fee. The submittal of an amendment under this subsection shall not subject the owner or operator to an enforcement action or a civil or criminal penalty if the original submittal of incorrect or insufficient information was not due to willful neglect.
- 4. The Control Officer may require submittal of supplemental emissions inventory questionnaires for air contaminants pursuant to A.R.S. §§49-476.01, 49-480.03 and 49-480.04.



Proposed rule changes – PCAQCD §3-1-103

- ~~• C5. The Control Officer may waive a requirement that specific information or data be submitted in the annual emissions inventory questionnaire for sources requiring Class II or Class III permits if the Control Officer determines that the submission or data would be unnecessary or unreasonable for a particular source or category of sources and instead may require alternative information from which emissions may be determined.~~
- The Control Officer may, with EPA approval, waive the emissions statement requirement for classes or categories of stationary sources with facility-wide actual emissions of less than 25 tons/year of NOx or VOC if the NOx or VOC emissions from such class or category is included in the ozone nonattainment Base Year and Periodic Ozone SIP Emission Inventories, and the actual emissions were calculated using EPA-approved emission factors or other methods acceptable to the EPA pursuant to CAA Section 182(a)(3)(B).



Proposed rule changes – PCAQCD §3-1-103

- **B. Emissions Estimation Methodology**

- Actual quantities of emissions shall be determined using the following emission factors or data.
 - Whenever available, **emissions estimates shall either be calculated** from **continuous emissions monitors** certified pursuant to 40 CFR Part 75, Subpart C and referenced appendices, **or data quality assured** pursuant to Appendix F of 40 CFR Part 60.
 - When sufficient data pursuant to Subsection (B)(1)(a) is not available, emissions estimates shall be calculated from data from **source performance tests** conducted pursuant to §3-1-170 in the calendar year being reported or, when not available, conducted in the most recent calendar year representing the operating conditions of the year being reported.
 - When sufficient data pursuant to subsection (B)(1)(a) or (b) is not available, emissions estimates shall be calculated using **emissions factors from EPA Publication No. AP-42** “Compilation of Air Pollutant Emission Factors,” Volume I: Stationary Point and Area Sources, Fifth Edition, 1995, U.S. Environmental Protection Agency, Research Triangle Park, NC, Including Supplements A through F and all updates published through July 1, 2011 (and no future editions). AP-42 is incorporated by reference and is on file with the Pinal County Air Quality Control District and can be obtained from the Government Printing Office, 732 North Capital Street, NW, Washington, D.C., 20401, telephone (202)512-1800, or by downloading the document from the web site for the EPA Clearinghouse for Emission Inventories and Emissions Factors.



Proposed rule changes – PCAQCD §3-1-103

- **B. Emissions Estimation Methodology**
- Actual quantities of emissions shall be determined using the following emission factors or data.
 - When sufficient data pursuant to subsections (B)(1)(a) through (c) is not available, emissions estimates shall be calculated from **material balance using engineering knowledge of process.**
 - When sufficient data pursuant to (B)(1)(a) through (d) is not available, emissions estimates shall be calculated by **equivalent methods approved by the Control Officer.** The Control Officer shall only approve methods that are demonstrated as accurate and reliable as one of the methods in subsections (B)(1)(a) through (d).
 - Actual quantities of emissions calculated under subsection (B) shall be determined on the basis of **actual operating hours, production rates, in-place process control equipment, operational process control data, and types of materials processed, stored, or combusted.**

How many industrial permits issued in Pinal County? Ozone (2015 NAAQS) Nonattainment Area?

- Industrial permits – 371 facilities Countywide
- Industrial permits in Ozone (2015 NAAQS) Nonattainment Area - 84

Rulemaking Timeline

- Today's stakeholder meeting
- Oral Proceeding – May 12, 2020 @ 11 a.m. – Building F, Ocotillo room
 - Public comments due by close of business May 12th
- Pinal County Board of Supervisors (BOS) Public Hearing – July 1, 2020 @ 9:30 a.m. 1891 Courthouse, Florence, AZ.
- After BOS Adoption – submittal to ADEQ for submittal to EPA.



Questions? Comments?

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