

March 18, 2009

TO: All Chapter 137 Reporting Facilities and  
Other Interested Parties

FROM: Tammy L. Gould, Emissions Inventory Program  
Bureau of Air Quality

SUBJ: 2008 Annual Air Emissions Inventory

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**The 2008 Annual Air Emissions Inventory is due on July 1, 2009.** This emissions inventory must include criteria air pollutants and greenhouse gases, and this year, hazardous air pollutants, as well.

Modified 2007 Data Files Ready to Download

The blue sheet contained in this mailing has the data file name, password and download location for the data set you should use to create your 2008 air emissions inventory. Please follow the directions on the back of the blue sheet to download and import this data set. The process has not changed from previous years, only the location of the files. This year, that location is <http://www.maine.gov/dep/air/emissions/2008datafiles.htm>. If you do not have internet access or a security firewall which prevents downloading of executable (\*.exe) files, please contact me and I will be happy to send you a disk with your data files.

This data set reflects our production data as of **March 6, 2009** and was created by copying your 2007 inventory data and making a number of changes.

- All existing hazardous air pollutant records were deleted.
- Fuel-burning process units were identified by SCC (Source Classification Code) and Process Unit Emission records (pollutants) were created for the thirteen hazardous air pollutants now required to be reported in the triennial inventory. Maine DEP has placed its default HAP emission factor in the record as a placeholder.
- Greenhouse gases no longer reportable under Chapter 137 have been deleted.
- New fields were added for the Emissions Contact and Senior Management Official e-mail addresses on the Facility General page. Also, new fields were added to track EPA's new identification system numbers on the Facility General, Group/Area and Stack Parameter pages.

**It is very important that you start with the data set provided by Maine DEP to complete your 2008 air emissions inventory.** If you have an existing data set for your facility already loaded in your Satellite i-STEPS program, you will need to delete that data set first before you try importing the modified 2007 data set. If you need instructions for deleting an existing facility data set and for importing the new data set, they can be found on our website at <http://www.maine.gov/dep/air/emissions/isteps-howto.htm#deleting>.

### Satellite i-STEPS Beginner Training Available

Back by popular demand! Maine DEP is pleased to once again offer FREE, HANDS-ON Satellite i-STEPS Training. This training will walk participants through all the steps necessary to complete the 2008 annual emissions inventory for criteria and hazardous air pollutants and greenhouse gases. This year's training will also include a brief overview of amendments which occurred to DEP's Chapter 137, "Emission Statements," in November 2008.

We will be offering training in both Augusta and Presque Isle this year. The enclosed yellow flyer lists the dates and locations of the training sessions. **Space is limited, so register early!** Contact Daniel Thoma at (207) 287-8672 or by e-mail at [daniel.thoma@maine.gov](mailto:daniel.thoma@maine.gov) to register.

### Changes to Chapter 137 Affecting the 2008 Air Emissions Inventory

In November 2008, the Board of Environmental Protection adopted a number of changes to DEP's Chapter 137, "Emission Statements." Many of these changes will be evident in our 2008 inventory. These changes include:

- Requiring air emissions inventories of only licensed facilities and for only licensed pieces of equipment and processes. Many facilities have previously reported emissions for activities that were considered "insignificant" for licensing purposes. Facilities are no longer required to report emissions for those activities. While these emission units may still be in your Satellite i-STEPS data set, Maine DEP plans to identify and delete all unlicensed activities by the start of the 2009 annual emissions inventory cycle. Facilities may choose to report zero emissions (or zero throughput) this year, mark them for deletion by changing the name of the Group/Area to "DELETE" or delete these units themselves for 2008. But, please remember: There is no UNDO if you unintentionally delete a reportable emission unit!
- Requiring reporting of thirteen hazardous air pollutants for all fuel-burning and combustion-related equipment, regardless of reporting thresholds in Appendix A of the rule. The HAP records have been pre-populated in the data sets provided for your 2008 emissions inventory;
- Removing the requirement to report hazardous air pollutants released to publicly-owned, treatment works (POTWs). This was a remnant of our early parallel with EPA's TRI inventory and is now deemed redundant; and
- Deletion of about 30 low toxicity hazardous air pollutants, another 25 greenhouse gases not covered by the Kyoto Protocol, and changes to the way that POM and chromium are reported. Facilities are encouraged to download the new 2008 Pollutant Code table found at <http://www.maine.gov/dep/air/emissions/2008.htm>.

### Default Emission Factors for Hazardous Air Pollutants

As mentioned previously, the modified 2007 data files have pre-populated HAP pollutant records using the DEP default emission factors for the thirteen required HAPs for select fuel-burning and combustion-related process units. This is intended to save owners and operators the effort of creating new pollutant records, not to imply that DEP believes those factors are the most appropriate estimation method. Facility owners and operators may choose to use the default emission factors and to accept the HAP pollutant estimates, or provide their own estimate (using an alternative emission factor or other estimation method), when completing their Satellite i-Steps submittal.

To develop its default emission factors, Maine DEP reviewed already available factors from EPA, trade groups and source testing in Maine. The DEP identified equipment and processes described by numerous source classification codes (SCCs) and matched emission factors, when available. Where there was no match, the Department identified emission factors from other related SCCs that we consider acceptable to estimate emissions when no better emission factor is available.

**We will not require that the default factors be used. We are simply providing them as a way to pre-populate the pollutant records and as tool to help facilities meet the new requirements of Chapter 137.** Additional information about the development of the default HAP emission factors and a spreadsheet of all factors and their applicable SCCs can be found on our website at <http://www.maine.gov/dep/air/emissions/2008.htm>.

#### A Few Other Inventory Items of Note...

- **Did not operate in 2008?** – If your facility did not operate in 2008, Maine DEP has a form letter on which you may certify your facility as closed or equipment as non-operational. You can download the form letter from our website at <http://www.maine.gov/dep/air/emissions/2008.htm>.
- **Do you know what the most common submission error is?** - The most common error we find on submissions is that facilities forget to change the year of inventory. Please remember to change the Year of Inventory field – found at the bottom of the Facility/General page – from 2007 to 2008!
- **Estimated Emissions Method Codes** – On the Process Unit Emissions screen, you must select a code which represents how you calculated your emissions: the Estimated Emissions Method code.

Code	When It Should Be Used
1	<b>Source Test</b> – Use this code when reporting emissions from CEMs devices or when emissions are calculated based on a stack test.
2	<b>i-STEPS Equation/Material Balance</b> – There is no equation involved, but this code should be used for estimates using a mass balance method.
3 and 5	<b>Manually Calculated/AP-42</b> and <b>Manually Calculated/Local EF</b> – For some processes, you may already be using emission calculation tools (such as TANKS) or using some other software program (Excel) that provides you with emission estimates. When emissions data is calculated using a program other than i-STEPS, enter those emission amounts using Code 3 or 5.
8	<b>i-STEPS Calculated/AP-42 EF</b> – This is the default method within Satellite i-STEPS. The program draws AP-42 emission factors from an underlying data table within the program and performs the emission calculation for you. The emission factor table was last updated in 2006.
9	<b>i-STEPS Calculated/Local EF</b> – When using this method code, the facility or DEP must supply an emission factor, then i-STEPS will use that factor to perform emission calculations. The factor can come from any source – so “local” does not refer where it comes from, but where it is used.

**Please remember:** When using Estimated Emissions Method codes 1,2,3 and 5, that emissions values do not “automatically” update themselves from year to year. You are required to place the new value in the Emissions (No Rule) field, not just in the NOTE or in other supporting documentation.

- **Certification Statements** – Again this year, we are asking all facilities to type a certification statement on company letterhead and attach it to the last page of the Detail Report for inventory certification. A sample certification statement can be found on our website at <http://www.maine.gov/dep/air/emissions/crit-rptng.htm#cert>.
- **Supporting Documentation** – Any time emission estimates are provided using any Estimated Emissions Method code other than 8 (**i-STEPS Calculated/AP-42 EF**) or 9 (**i-STEPS Calculated/Local EF**), facilities are required by Chapter 137 to provide supporting documentation for their emission calculations. Please remember to include a comment in the NOTE field or provide these documents with your Satellite i-STEPS submission. It slows our review of your submission significantly if we must contact you to obtain this documentation.

#### E-mail Address for Submissions

Last year, the Emissions Inventory Program established a new e-mail address for your questions and inventory submissions: [emissionsinventory@maine.gov](mailto:emissionsinventory@maine.gov). This new e-mail address will route your e-mail to our staff and ensure that you get a same-day response to most questions or an acknowledgement that attached files have been received. **Please do not e-mail your emission inventory submissions to Tammy Gould, Dan Thoma or Becky Hodsdon.** Facilities should use the [emissionsinventory@maine.gov](mailto:emissionsinventory@maine.gov) address for all e-mail submissions.

#### On-Site Help, Telephone, and E-Mail Assistance Available

The Emissions Inventory Program staff is available to help you with your i-STEPS and inventory questions. Appointments for on-site inventory assistance or assistance at our Augusta offices can be made through June 1. Beyond that date, our staff are busy answering telephone calls and e-mails through the July 1 reporting deadline. And don't forget to take advantage of the training programs mentioned earlier!

If you have any questions, contact one of us. Please note the areas of expertise as you make your call, but we are cross-trained to handle many routine questions. Thank you.

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Also, visit our website established for the 2008 inventory, <http://www.maine.gov/dep/air/emissions/2008.htm>, for inventory related documents, links, and instructions.