

## **Hazardous Air Pollutants: Default Emission Factors**

### **DEP amendments to Chapter 137 will affect the 2008 HAP inventory**

The Department of Environmental Protection's Chapter 137, Section 3(C) requires the owner or operator of a facility that emits hazardous air pollutants (HAPs) to file an emissions statement every three years for those HAP emissions. In November 2008 several changes were made to the reporting requirements in Chapter 137:

- Emissions must only be reported for facilities that are required to or have obtained a license.
- Emissions must only be reported for equipment and processes included in the license.
- Emissions of thirteen HAPs from all fuel-burning or combustion equipment included in the license must be reported, whether or not emissions exceed the Appendix A reporting thresholds.

### **Select the method for estimating your HAP emissions**

Chapter 137, Section 5 provides a hierarchy for emission estimation methods. When determining how to estimate your emissions, you should consider the method in Section 5(A) before 5(B), 5(B) before 5(C), and so on. Section 5(F) indicates that the Department will provide "default" emission factors to be applied only when, for a particular process or equipment, there is no data from CEMS/PEMS, data from stack testing, facility-specific emission factor approved by DEP, EPA-published emission factor, or emission factor from an industry or trade group based on sound science.

### **How did DEP develop the default emission factors?**

When developing the default emission factors referenced in Section 5(F) for the thirteen HAPs listed in Section 3(C)(3), 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) for which no published emission factors were available. We understand that many facilities have equipment and processes described by these SCCs for which HAP emission reporting is required under Chapter 137, Section 3(C)(3). To aid facility owners and operators in meeting the Chapter 137 requirements, the Department identified emission factors for other related SCCs that we would be willing to accept when used to estimate emissions for equipment and processes for which no other, better emission factor is available. We recognize that they may be low quality factors when applied in this manner, and we strongly encourage owners and operators to conduct source testing or otherwise determine more accurate emission factors for their facilities.

### **How will the default emission factors be used?**

In 2008, the Department will once again provide Satellite i-Steps data files to facility owners and operators to use to build their 2008 annual inventory. Those files will have pre-populated pollutant records using the 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. **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.**