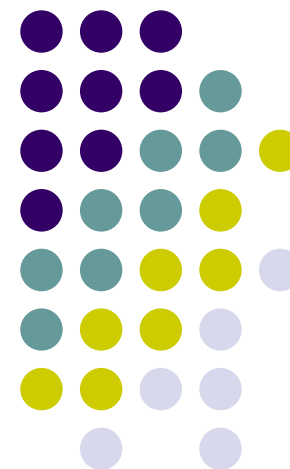
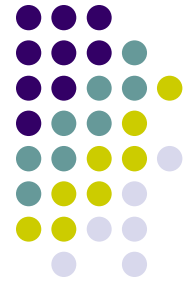


Air Emissions Reporting Requirements (AERR) Rule

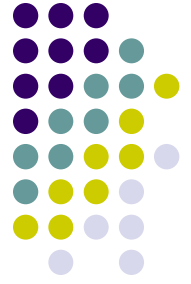
Dennis Beauregard
Emission Inventory and Analysis Group
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
March 17, 2009





Why Was the AERR Developed?

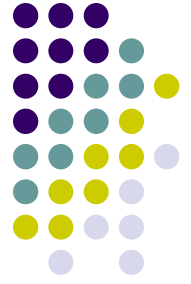
- Early emissions reporting requirements were located in several areas of the Code of Federal Regulations (CFR)
- The Consolidated Emissions Reporting Rule (CERR) initiated the process of organizing and simplifying emissions reporting requirements
- The AERR continued to organize and simplify emissions reporting requirement by:
 - Harmonizing CERR and NOx SIP Call reporting requirements
 - Deleting, adding and revising data elements to update reporting requirements



Who Needs to Report?

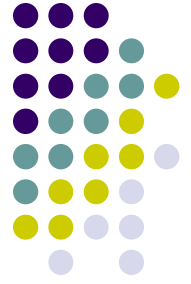
- States are responsible for reporting emissions from sources on non-tribal lands
- If local agencies have the lead role for developing emission inventories or inventory categories, the AERR also applies to them
- The AERR can apply to tribes that have been granted “treatment as state” status under the Tribal Authority Rule and have approval to implement rules through a Tribal Implementation Plan.

When Will the AERR be Implemented?



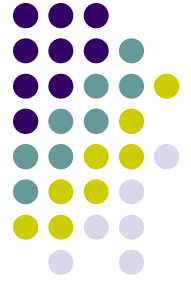
- Implementation begins with the 2009 inventory
- 2009 and 2010 will be Type A source reporting years
- 2011 will be the first triennial (comprehensive) inventory
- Therefore, states will have two years of large point source data reporting to become familiar with the new AERR and EIS requirements before a comprehensive inventory is required

Reporting Changes in AERR



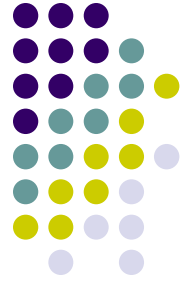
- 40 CFR 70 definition of major source now used for point source reporting
- The AERR requires emissions to be reported within 12 months from the end of the inventory year rather than 17 months under the CERR
- No biogenic emissions requirement

Reporting Changes in AERR (con't)



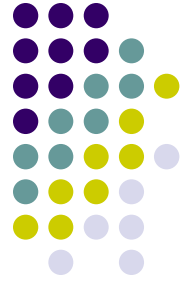
- Model inputs in lieu of emissions will be acceptable
- Data elements for reporting have been updated
- Summer day emissions of VOC and NOx for ozone nonattainment areas only
- Winter work weekday emissions of CO required for nonattainment areas and areas with maintenance plans.

Reporting Changes in AERR (con't)



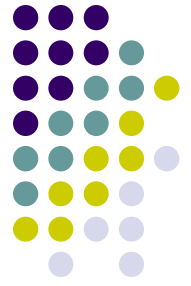
- Particulate Matter
 - PM primary (sum of filterable and condensible components) must be reported as under the CERR
 - Reporting of the filterable and condensible components is a new requirement
 - We added the component reporting requirement to help us understand what was being reported as PM primary

What are the Reporting Cycles and Averaging Times?



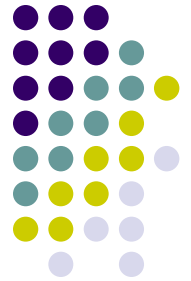
- Every Year Cycle Reporting
 - Annual emissions from Type A (large) point sources. If one pollutant qualifies source as Type A, all pollutants must be reported
 - Ozone season and summer day emissions of NO_x from sources controlled to meet SIP Call requirements

What are the Reporting Cycles and Averaging Times (con't)?

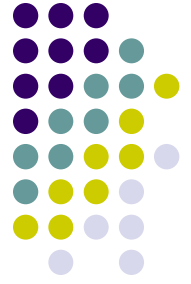


- Three Year Cycle Reporting
 - Annual emissions of criteria pollutants from all sources
 - Ozone season and summer day emissions of NO_x from all sources
 - Summer day emissions of NO_x and VOC for ozone nonattainment areas
 - Winter work week day emissions of CO for nonattainment areas and attainment areas with maintenance plans

What Pollutants Need to be Reported?



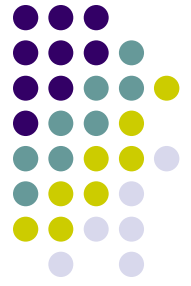
- States must report emissions of the following pollutants:
 - Volatile Organic Compounds (VOC)
 - Primary PM_{2.5}
 - Primary PM₁₀
 - Nitrogen Oxides (NO_x)
 - Carbon Monoxide (CO)
 - Lead and Lead Compounds (Pb)
 - Sulfur Dioxide (SO₂)
 - Ammonia (NH₃)



What About HAPs and GHGs?

- Hazardous Air Pollutants (HAPs) are not required, but we encourage agencies to submit them on a voluntary basis using the requirements of the AERR
- Greenhouse Gases (GHGs) are not required

Will Point Source Reporting for Pb be Changed?



- The Pb NAAQS final rulemaking was promulgated on October 15, 2008 and changed the Pb emission inventory point source threshold from 5 tons/year to 0.5 tons/year
- We intend to revise the 5 tons/year threshold for Pb point sources in the AERR to help identify the potential for Pb point source problems in attainment/unclassifiable areas under the new Pb NAAQS



Early Data Submittal Program

- EPA is interested in encouraging states to submit data by 12/31/09 for the 2008 inventory year
- States that participate in the Early Data Submittal Program will receive recognition from EPA
- Additional details on the Early Data Submittal Program will be communicated via the NEI Listserv