

2009 Emissions Inventory Newsletter

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Bureau of Air

*****Proposed 2011 EMISSION REPORTING AND FEES*****

-IMPORTANT INFORMATION-

KDHE is drafting changes to the regulations regarding emissions reporting and fees, K.A.R. 28-19-202 and 28-19-517, in order to meet program requirements and those of the federal Air Emissions Reporting Rule (AERR). The AERR was finalized on December 4, 2008; however, the Kansas regulations have not been formally changed yet. We expect the proposed regulations to be published in the Kansas Register sometime in February with at least 60 days notice for a public hearing and open comment period. We welcome your comments on the proposal.

NEW SUBMITTAL DATE

Effective January 2011, the due date for all emission inventory forms will be **APRIL 1st**. Therefore this is the last year for the June 1st due date.

NEW FEE INCREASE

Effective January 2011, emission fees will be increased to **\$31** per ton.

NEW MINIMUM FEE THRESHOLDS

Effective January 2011, emission fees will be assessed for all air emissions of SO_x, NO_x, VOCs, PM₁₀, and HAPs. The previous minimum thresholds of 100, 25, and 10 tons have been dropped. The 4,000 ton emissions fee cap remains in effect.

OPERATING PERMIT FEES and EMISSION FEE CREDITS

Did you know?

The fee to renew your Class I operating permit may be reduced by the amount of any annual emissions fee paid. K.A.R. 28-19-516(c) states the application fee required by this regulation may be reduced if:

- The annual emission fee was due and paid within 12 months preceding application fee
- The fee involves the same stationary source and entity responsible for the fee
- The fee reduced does not exceed the annual emissions fee paid

Do you have an unused Emission Credit?

If you have an emission credit, please use it. In the future we will be returning payments if there are any outstanding credits. We will also be issuing refunds for over-payments instead of credit coupons.

Clarification for Reporting of HAP Compounds

KDHE has revised Appendix B (Hazardous Air Pollutant List) for the reporting of HAP compounds. The reason for the change is to be consistent with the latest pollutant codes in the National Emission Inventory. When reporting HAP compounds, KDHE policy is to report the elemental HAP CAS # pollutant codes and only the mass of the HAP component. The list of affected pollutants is mainly metals such as lead and chromium.

For users of the paper emission inventory forms, this should not be a very large change. For the HAP compounds we are now asking that you report only the emissions of the HAP from the list in Appendix B.

Previously if you were using the web submittal you would have reported HAP compounds as a 3-digit pollutant code provided by the pollutant code list in the web system. For example, when reporting lead compounds you would have used the 3-digit pollutant code of 195. Now KDHE policy is to report the emissions of the HAP only, which in this case would be "lead" and use the CAS # for lead which would be 7439921. Then you would calculate your amount of lead as in the example below. The 3-digit numbers are removed from the pulldown list on the web. You will notice that if you reported emissions using these codes last year, we have changed them to the CAS # codes.

Example:

Say you have 100 pounds of strontium chromate emissions. The atomic mass for strontium chromate is 204. The atomic mass of chromium is 52.0, which equals 25.5% of the total atomic mass, which would be 25.5 % of the 100 pounds. Thus 25.5 pounds divided by 2,000 pounds/ton would give you .013 tons of chromium with 7440473 as the reported pollutant code.

Below is a table of the affected pollutants.

Affected Pollutants

Removed Pollutant

Suggested Pollutant

Name	Code	Name
Antimony Compounds	7440360	Antimony
Arsenic Compounds	7440382	Arsenic
Beryllium Compounds	7440417	Beryllium
Cadmium Compounds	7440439	Cadmium
Chromium Compounds	7440473	Chromium
Cobalt Compounds	7440484	Cobalt
Coke oven emissions	-	
Cyanide Compounds	57125	Cyanide
Lead Compounds	7439921	Lead
Manganese Compounds	7439965	Manganese
Mercury Compounds	7439976	Mercury
Nickel Compounds	7440020	Nickel
Polycyclic organic matter (includes dioxins and furans)	-	
Selenium Compounds	7782492	Selenium