



## GUIDANCE

### **-EMISSIONS DATA HIERARCHY-**

#### **Purpose and Applicability**

The purpose of this guidance is to establish the hierarchy of emissions data acceptability for air quality permit (PTC, Tier II, and Tier I) applications and permit applicability decisions.

#### **Emissions Data Hierarchy**

When estimating emissions, emissions data that best reflects emissions from a stationary source<sup>1</sup> must be used. The following represents the hierarchy of emissions data that is acceptable to DEQ from best data quality to worst data quality:

1. Continuous Emissions Monitoring (CEM) data from the stationary source
2. Performance test data from the stationary source
3. Manufacturer emissions guarantee
4. CEM data from a similar stationary source or sources
5. Performance test data from a similar stationary source or sources
6. AP-42 or industry-derived emission factors

#### **Discussion**

Listed below is the emissions data hierarchy along with a discussion regarding the basis for the emissions data acceptability.

1. Continuous Emissions Monitoring (CEM) data from the stationary source

CEM data from the stationary source provides the best emissions data. CEMs are calibrated and maintained according to federal regulations and are required to monitor the real-time emissions from the stationary source during the vast majority of the stationary source's actual operating time.

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<sup>1</sup> Stationary source is defined as "any building, structure, facility, emissions unit, or installation which emits or may emit any air pollutant. The fugitive emissions shall not be considered in determining whether a permit is required unless required by federal law." Refer to IDAPA 58.01.01.006.117

2. Performance test data from the stationary source

In absence of CEM data, performance test data from the stationary source is the next best source of emissions data. Performance test data must include information regarding the operation of the stationary source and any air pollution control equipment in use during the test.

3. Manufacturer emissions guarantee

Manufacturer emissions guarantees that are stated in specific and quantifiable terms are considered the next most reliable emissions information.

4. CEM data from a similar stationary source or sources

CEM data from a similar stationary source or sources may be considered acceptable provided a clear discussion of how and why the emissions are similar is documented. Similar sources are those serving a similar operating function, using similar raw materials, having similar processing rates, and those using the same type of air pollution control equipment.

5. Performance test data from a similar stationary source or sources

Performance data from a similar stationary source or sources may be considered acceptable provided a clear discussion of how and why the emissions are similar is documented. Similar sources are those serving a similar operating function, using similar raw materials, having similar processing rates, and those using the same type of air pollution control equipment.

6. AP-42 or industry-derived emission factors

AP-42 or industry-derived emission factors should only be used when there is an absence of the emissions data of the type listed above.

AP-42 emissions factors represent the average emissions for a given group of stationary sources or activities. Being averages, AP-42 emission factors must be used with caution because emissions from half of the group of stationary sources or activities may be higher than the emission factor while emissions from the other half of the group may be lower. AP-42 emissions factors are rated A through E; A is considered the most reliable and E the least reliable. The rating of the AP-42 factor must be considered in determining how accurately the AP-42 emissions factor represents actual emissions from the subject source.

If industry derived emissions factors are used, they must be accompanied with documentation describing how the emission factor was derived.