

ACHD Reporting Limits Criteria and HAP Emissions

AES* ONLINE EMISSION ESTIMATES

- THE LOWER REPORTING LIMITS DEFINED BY PA DEP DO NOT APPLY IN ALLEGHNEY COUNTY
 - NO LOWER LIMIT ON THE REPORTING OF EMISSIONS OF CRITERIA POLLUTANTS
 - HAP EMISSIONS MUST BE REPORTED AT THE SUB-FACILITY LEVEL FOR ACTUAL EMISSIONS OF 0.1 TONS OR 200 POUNDS AND ABOVE WITH EXCEPTIONS DESCRIBED BELOW

AES* ONLINE EMISSION ESTIMATES CONT.

- REPORTABLE HAP EMISSIONS LESS THAN .01 TONS SHOULD BE REPORTED IN POUNDS.
- NEW CALCULATION METHOD CODES – 4,5,6,7 AND 8 ARE ASSIGNED BY AIMS/eFACTS.
- CODES BELOW ARE ASSIGNED BY THE SOURCE.

1. Stack test

2. Company Stack Test approved by ACHD

3. Other Company Test Approved by ACHD

9. See comment

10. Company SCC Factor

11. Company Material Balance

12. Company Efficiency of Control Device

14. Continuous Emission Monitoring

15. AP-42 Latest available

16. Company – Calculated Site Emissions

EXCEPTIONS TO LOWER HAP EMISSION REPORTING LIMIT

- **EPA Reporting Recommendations/Strategies in order of Preference**
- **De-minimis levels**
- * Chromium Compounds
- * Mercury Compounds
- * Polycyclic Organic Matter Compounds.

- **Dioxins/Furans**
- 1. Report mass emissions and the associated CAS#'s of all individual congeners of chlorinated dibenzodioxins (CDDs) and chlorinated dibenzofurans (CDFs).
- 2. If it is not possible to identify individual congeners, then report dioxins and furans as 2,3,7,8 Tetrachlorodibenzodioxin (TCDD) toxic equivalents (TEQ) under the HAP name "dioxins/ furans as TEQ". **Do not report dioxins/furans with POM emissions.**
- 3. Report emissions as total dioxins or total furans where it is not possible to report individual congeners.

- **Xylenes and Cresols**
- 1. Report emissions for individual xylene and cresol isomers with their associated CAS#'s. Do not report any emissions for total xylenes or cresols.
- 2. If you cannot report individual emissions of isomers of xylene and cresol, then report total emissions of xylenes under CAS# 1330207 or cresols/cresylic acid.

- **Glycol Ethers**
- 1. Report emissions for individual glycol ethers with their associated CAS#'s . Use the Toxic Release Inventory (TRI) guidance on glycol ethers to identify compounds that are actually glycol ethers

EXCEPTIONS TO LOWER HAP EMISSION REPORTING LIMIT

- **Metals and Cyanide Groups**

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- 1. Separate emissions of metals from those of metal compounds.
- Example: arsenic - CAS# - amount emitted
- Lead arsenate - CAS# - amount emitted
- All individual compounds should be reported as mass of the total compounds not just the metal within the compound
- 2. Report two forms of the toxic material of widely - varying toxicity. This alternative method is especially applicable to chromium, lead, mercury and nickel.
- Report only the mass emissions of the metal not of the entire metal compound
- Example: Trivalent Chromium- CAS# 160658
- Hexavalent Chromium- CAS# 18540299
- Separate lead compounds into organic and inorganic
- Separate mercury compounds into organic (CAS# 22967926) and inorganic (CAS#7439976)
- Separate nickel compounds into nickel subsulfide (CAS# 12035722) and other nickel (CAS#7440020)
- For all other metal and cyanide groups report total emissions in terms of the mass of the metal or cyanide alone under the CAS# of the metal or cyanide.

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- **Polycyclic Organic Matter Compounds**

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- 1. Identify and report as many individual POM compounds with associated CAS numbers as possible. It is especially important to differentiate the seven PAH compounds from POM. Seven PAH compounds should be reported individually if at all possible as well as the POM compounds for which cancer assessments are available.
- 2. If individual PAH's cannot be reported, then report 7-PAH as a subgroup.
- 3. Naphthalene is a HAP and should be reported individually even though it is a component of total POM.