



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Dave Freudenthal, Governor

John Corra, Director

December 1, 2005

TO: Title V Major Sources in Wyoming

RE: Use of Portable Analyzer Measurements for Emission Estimates for Fee Purposes

The Division has been accepting the use of portable analyzer periodic monitoring data for the calculation of annual emissions for fee purposes for the past several years. During that time period, we have had the opportunity to review a significant amount of portable analyzer emissions data, primarily from the testing of compressor and generator engines. I am no longer confident that the reported emissions measured by portable analyzers are representative of normal source operations.

Beginning with the annual emission inventory for 2006, the Division will no longer accept portable analyzer emissions test data for the calculation of emissions for fee purposes. The emissions reported for calendar year 2005 which must be submitted by March 1, 2006, will be the last time that portable analyzer data may be used to estimate actual emissions for fee purposes. The portable analyzer data may continue to be used as an indicator of engine performance for compliance certification purposes if better data is not available.

After calendar year 2005, the calculation of NO_x emissions for fee purposes will be done as specified in Chapter 6, Section 3(f). In order of decreasing accuracy, the calculation options are as follows:

1. The use of continuous emissions monitoring data;
2. The use of reference method testing for emissions tested during the reporting year, or from a contemporary time interval acceptable to the Division;
3. The use of manufacturers' emission estimation data (as used for permitting purposes);
4. The use of estimated emissions from EPA's AP-42 "Compilation of Air pollutant Emission Factors" or other Division approved source specific emission factors.
5. Alternatively, actual emissions may also be presumed to be allowable emissions determined by permit or standard unless there is evidence that actual emissions are in excess of the allowable emissions.

If you have additional questions regarding this matter, please feel free to contact this office.

Sincerely,

Dan Olson, Administrator
Air Quality Division

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