

December XX, 2011

To All Title V Permit Holders and Applicants

Enclosed with this letter, you will find the Division's Emission Inventory forms for use in completing the emission inventory of criteria and hazardous air pollutants for calendar year 2011. As required under Chapter 6, Section 3(f)(v)(G) of Wyoming Air Quality Standards and Regulations (WAQSR), emission inventories shall be submitted to the Division for fee assessment and compliance determinations within **sixty (60) days** following the end of calendar year. Emission inventories for 2011 must be postmarked no later than March 1, 2012.

Note that PM_{2.5} is now included as a reported pollutant for the inventory. Under WAQSR Ch 6, Sec 3(b), a regulated air pollutant includes any pollutant for which a national ambient air quality standard has been promulgated. EPA requires that we report actual emissions of all regulated air pollutants from Title V sources. The Division also needs this information to be able to conduct PSD analyses. In most cases, we anticipate that emission estimates for PM_{2.5} will be made using manufacturer data, AP-42 emission factors, or other available emission factor data, as few sources in the state have been tested for PM_{2.5}. You will **not** be billed for PM_{2.5} at this time; billing will be based on PM₁₀ emissions as in the past.

To minimize additional information requests, please consider the following:

- The Responsible Official for the facility must sign the completed emission inventory, certifying that, based on information and belief formed after reasonable inquiry, the information contained therein is true, accurate and complete.
- Not all of the forms contained in this mailing are applicable to all facilities. Please select the forms that are appropriate for your facility and make additional copies as needed. Forms are also available in Word and pdf formats on our website at <http://deq.state.wy.us/aqd/ei.asp>.
- Please use identification numbers and descriptions of emission units which correspond to those contained in the operating permit or the operating permit application submitted for this facility. If you have questions, please contact your District Air Quality Engineer.
- The emission inventory must include an accounting of fugitive emissions.
- The emission inventory must include any emissions in excess of allowable rates that occur as the result of start-ups, shutdowns and equipment malfunction and/or failure.
- Entries under "Estimated Potential Emissions" on the inventory need to be included with the inventory.

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- All emission units located at a major facility must be identified in the inventory. Emission units not operating or shut down should be identified as such. For small operating sources, actual emissions that are reasonably expected to be less than 1 ton per year can be stated at <1 TPY without further calculation, though operating parameters should still be provided (like hours of operation, throughput, fuel use, etc.).
- Emissions of regulated hazardous pollutants listed under Section 112(b) of the Clean Air Act need not be reported on HAP Form A if such emissions are less than 1000 pounds per year, and the actual emission levels do not exceed exemptions based on insignificant emission levels established through rulemaking by EPA. If hazardous pollutants are emitted, fill out HAP Form A for each emission point.
- Emissions from activities that are incidental to a source's primary business function likewise need not be reported if they are less than 1 ton per year. (For example, plant maintenance and upkeep activities, welding, painting, air conditioning, ventilating, heating units for human comfort, and the like.)
- Again this year, please report any ammonia emissions from your facility.

On July 1, 2010 the Title V emission fee increased from \$28.16 per ton to \$31 per ton. As a result, emissions occurring during calendar year 2011 will be billed at a rate of \$31 per ton.

Please return the original and one copy of each section of the completed inventory to:

Administrator, Air Quality Division-DEQ
c/o Janet Stephens, Operating Permits Program
122 West 25th Street
Herschler Building, 2-East
Cheyenne, Wyoming 82002

If you have difficulty in completing any of the inventory forms, please contact the District Engineer responsible for your area of the State as noted on page 3 of your operating permit, or the Cheyenne office. Contact information may also be found at <http://deq.state.wy.us/aqd/contacts.asp>. Your cooperation in the timely and accurate completion of the 2011 emission inventory is appreciated.

Sincerely,

Lori N. Bocchino
Operating Permit Program Manager
Air Quality Division