Air Emissions Reporting Requirements (AERR) and Conference Highlights

Marc Houyoux

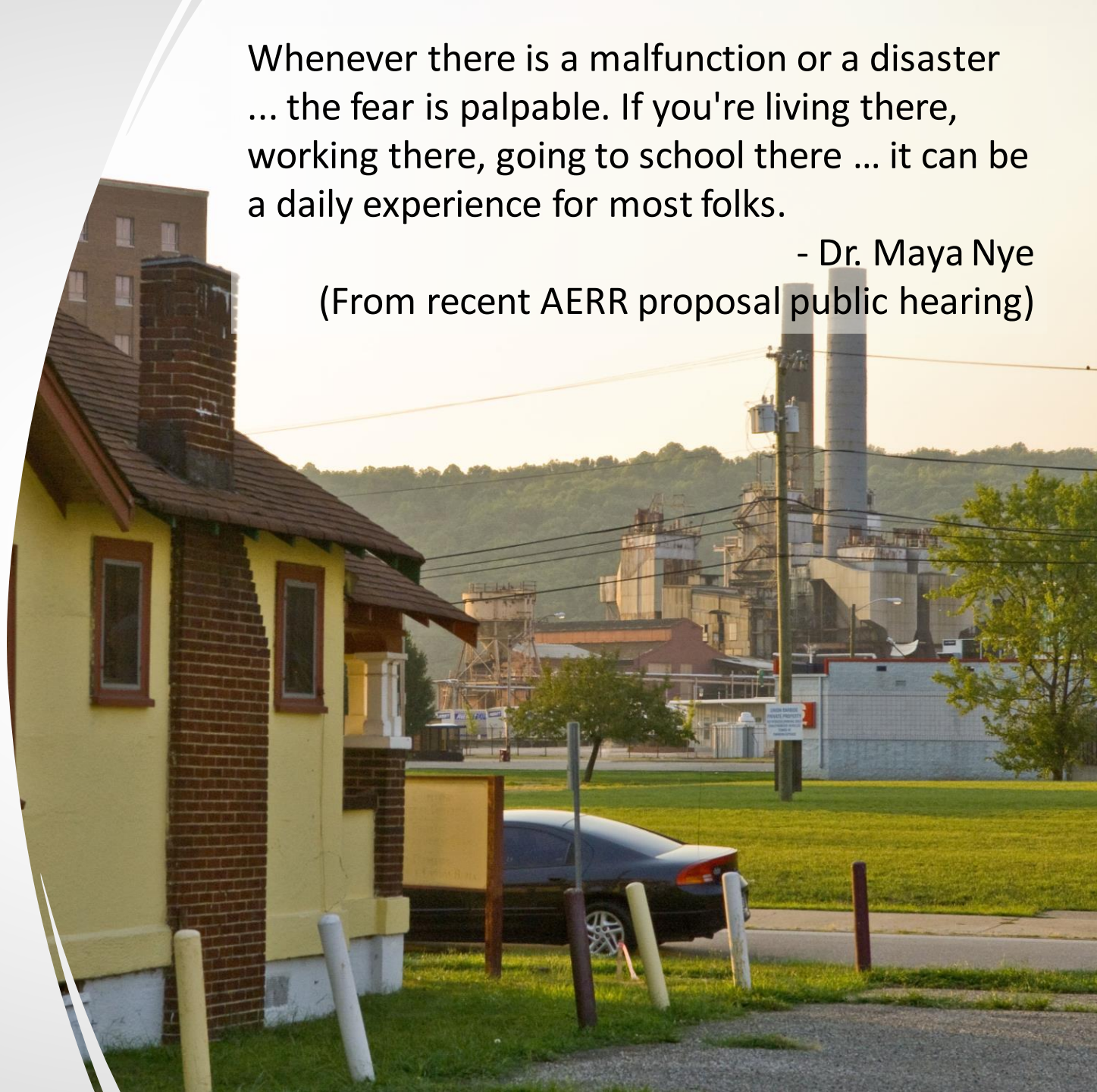Emissions Inventory and Analysis Group

Office of Air Quality Planning and Standards, US EPA

EPA is proposing to revise the AERR to make sure that EPA and communities have critical data to understand risks

Proposing to require reporting of hazardous air pollutants (HAP), which are currently voluntary under the rule

Whenever there is a malfunction or a disaster ... the fear is palpable. If you're living there, working there, going to school there ... it can be a daily experience for most folks.

- Dr. Maya Nye

(From recent AERR proposal public hearing)

AERR Backstory

1990 — **Clean Air Act amendments:** New per[mit...] nonattainment areas

1998 — **NOx SIP call requirements:** Set trie[...] reporting requirements for NOx sources

2002 — **Consolidated Emissions R[...]**
- Simplify emissions reporting [...] mobile sources, include fine particula[...]
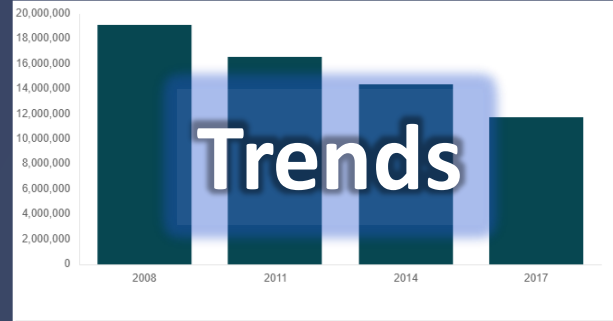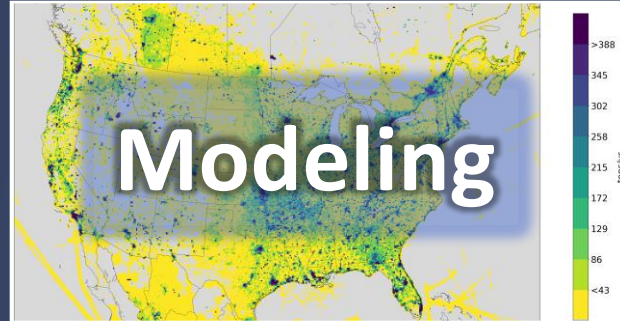- EPA: "We plan to develop HAP reporting measures at a future date"

2008 — **Original AERR:** Consolidate, reduce, and simplify current requirements, adds limited new requirements, and provides additional flexibility to states, and accelerates reporting of emissions to EPA

2015 — AERR Revision did not propose HAP changes

"The EPA believes it will be possible to continue developing and improving national level HAP inventories using the cooperative approach employed to date but intends to closely monitor the participation of state agencies in this effort."

EPA Uses the HAP Emissions Data

Modeling

Regulatory

Risk Analysis

Non-regulatory (AirToxScreen)

Trends

ORD Report on the Environment

International Reporting

Public Info

Website

Environmental Justice Tools

Public

Research

Some Key Proposed AERR Changes

HAP emissions for point sources

Industry and State/Local/Tribal (SLT) emissions reporting
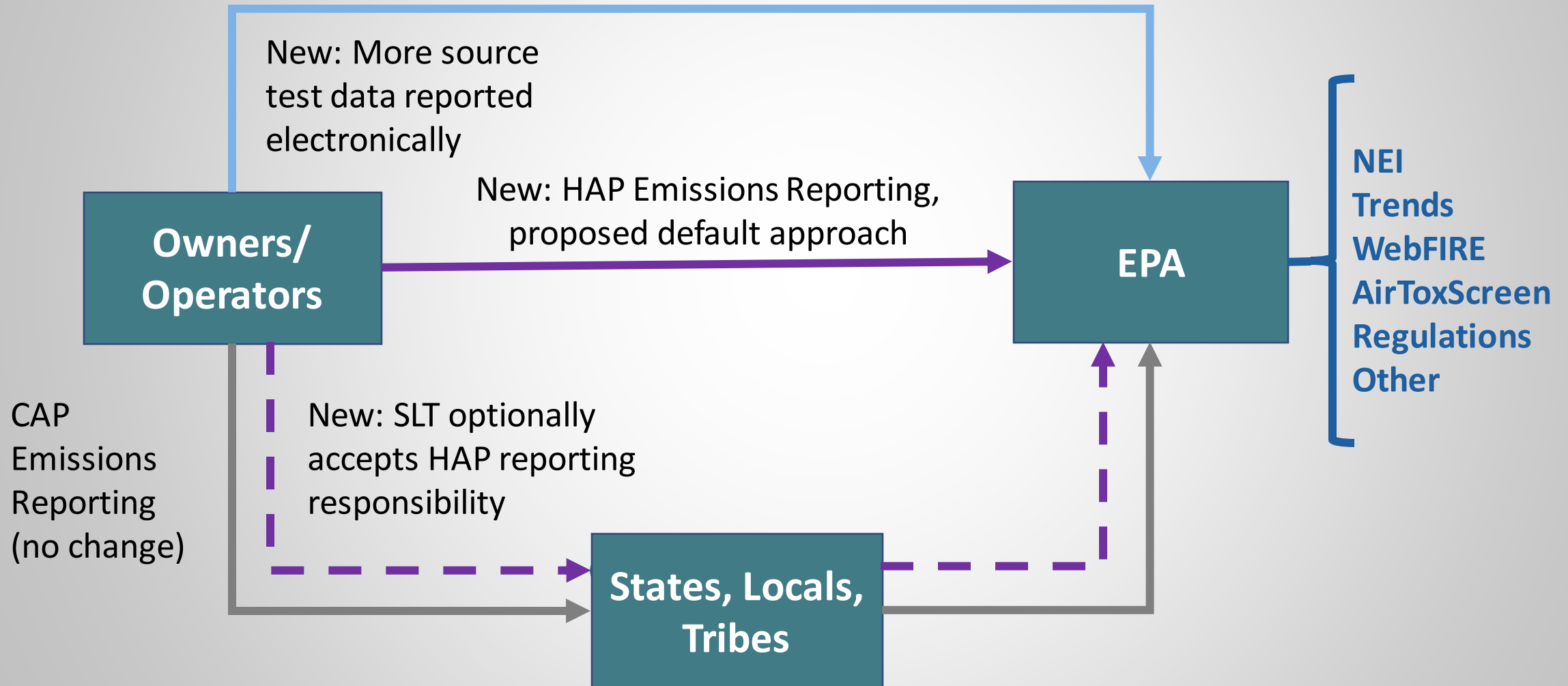
Use best available approach to estimate emissions

Electronic source test reporting

Mandatory prescribed burning activity

Proposed AERR Point Source Collection

New: More source test data reported electronically

New: HAP Emissions Reporting, proposed default approach

Owners/ Operators

EPA

NEI Trends WebFIRE AirToxScreen Regulations Other

CAP Emissions Reporting (no change)

New: SLT optionally accepts HAP reporting responsibility

States, Locals, Tribes

Some Proposed Provisions for Point HAP Emissions Data

Definition of point sources: add HAP, major sources, and selected non-major

Timing: Start with 2026 emissions (in 2027) for most sources and phase in earlier deadlines over time

Small businesses: option to report less detailed data

Other: release point locations, regulatory applicability

Industry and SLT emissions reporting

Owners/operators report...

- HAP emissions data unless SLT optionally reports on their behalf
- CAP and HAP emissions data if not within authority of SLT (such as Indian country and Federal waters)
- Report using Combined Air Emissions Reporting System (CAERS)

SLTs report...

- CAP emissions data
- HAP emissions data for owners/operators if they are approved by EPA to do so
  - SLT regulation accomplishes same as if reported by owners/operators
- Prescribed fires activity, optionally wildfires and agricultural fires
- Airports, rail yards, nonpoint, mobile

Best Available Approach To Estimate Emissions

- Proposed point source requirement to use best available methods to estimate emissions, preferring source test data when available
  - Continuous monitoring
  - Source tests
    - Owners/operators can indicate why available source test data are not appropriate for estimating annual emissions and then select another emissions approach
  - Emission factors
  - Mass balance, engineering judgement, speciation profiles
- CAERS plans to connect emissions reporting with source test data and emissions factors available in EPA's WebFIRE repository
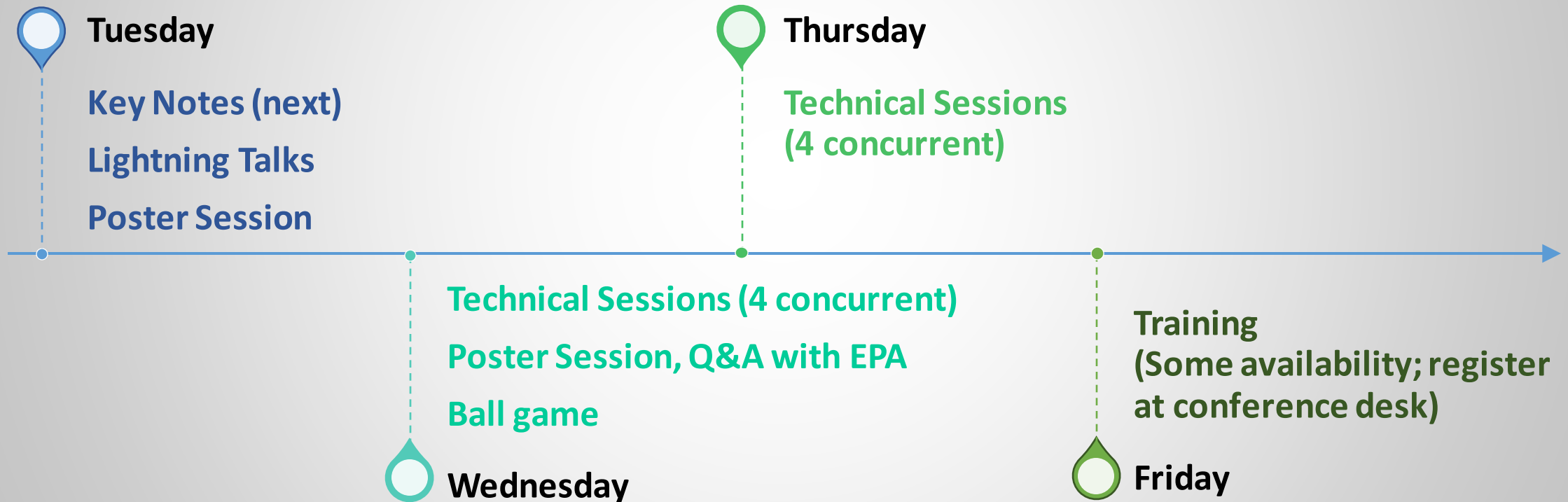
Electronic Source Test Reporting

- To improve the data available to EPA, States, and sources to estimate emissions

- Proposal to require electronic reporting of source tests and performance tests when:
  - Not otherwise reported to EPA (from other regulations)
  - Gathered to meet any other Federal or State requirement
  - Supported by EPA electronic reporting
    - Currently, the Compliance and Emissions Data Reporting Interface (CEDRI) and the Emissions Reporting Tool (ERT)
  - No subject to confidential treatment because of research purposes

Mandatory Prescribed Burning Activity

- Starting for 2026 inventory, would require states, locals, certain tribes to report activity data for certain prescribed burns
  - A broadcast burn or understory burn impacting at least 50 acres
  - A pile burn that includes biomass from at least 25 acres
  - A prescribed burn that includes pile burning and other prescribed burning types that, in total, affects 25 acres
- Excludes agricultural burning

EIC at a Glance

Tuesday

Key Notes (next)

Lightning Talks

Poster Session

Thursday

Technical Sessions (4 concurrent)

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Poster Session, Q&A with EPA

Ball game

Wednesday

Training (Some availability; register at conference desk)

Friday

What's New

Sessions

COVID impacts

Longer, interactive RWC

International presenters integrated

Remote access for plenary and trainings

New conference software

Coffee Wednesday morning

- Thank you Lakes Environmental

Longer lunch breaks

More talks (20 minutes each)

Important Reminders

- Any agenda changes to be included online and in app
- Poster sessions are a good way to meet and discuss with inventory community
- Training sessions are by registration only
- Masks and hand sanitizer are available
- Respect presenters, support staff, and each other
- Complete the survey