



BUREAU OF AIR

**Staff
Contacts**

**Will Stone
785-296-6427**

**Barb Bangert
785-296-1582**

**Cathy Richardson
785-296-1947**

**[www.kdheks.gov/
emission/index.html](http://www.kdheks.gov/emission/index.html)**

2011 Emissions Inventory Newsletter

Double-Check Your HAPs

Is your facility required to report TRI data to EPA? If so, the totals reported to TRI should correspond with the HAP totals reported on your Annual Emission Inventory when pollutants are the same. Although the Bureau of Air and the Emission Inventory Group do not collect or quality assure the TRI data, we do use it to compare the reported HAPs on our Annual Emission Inventory as part of our quality assurance process.

For example:

There was 1.0 ton of Hydrochloric Acid reported on the Annual Emission Inventory Form.

On Form R for TRI there were 14,000 pounds of Hydrochloric Acid reported.

SECTION 5. QUANTITY OF THE TOXIC CHEMICAL ENTERING EACH ENVIRONMENTAL MEDIUM ONSITE					
			A. Total Release (pounds/year) (Enter a range code** or estimate)	B. Basis of Estimate (enter code)	C. % From Storm Water
5.1	Fugitive or non-point air emissions	NA D	1000		
5.2	Stack or point air emissions	NA D	13000		

The discrepancy between the Annual Emission Inventory form and TRI will lead to additional quality assurance and may necessitate revisions.

Performance Testing & the Emission Inventory

Facilities reporting actual emissions to KDHE frequently use performance test results to develop emission factors. KDHE prefers the use of approved performance test results in the emissions inventory to all other calculation methods other than continuous monitoring systems (CMS), including AP-42 emission factors and manufacturers' published emissions factors. KDHE encourages the use of performance test results to quantify emissions or control efficiencies in the emissions inventory as long as the conditions of K.A.R. 28-19-210(d) are met:

Prior approval by the department shall be obtained before the development of an alternative emission factor or control device efficiency based upon performance testing of an emissions unit or stationary source.

Before testing please review KDHE's Air Quality Performance Test Guidelines at http://www.kdheks.gov/air-permit/forms/Performance_Test_Guidelines.pdf to ensure compliance with KDHE policy.