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POLICY REGARDING EMISSION FACTOR USAGE FOR THE COAL INDUSTRY

In a continuing effort to ensure accuracy and consistency within all Division of Air Quality (DAQ) programs, the following interpretation is offered as a clarification of coal crushing and screening emission factors. The emission factors used by the coal industry are critical for the determination of not only program applicability, but also fiscal responsibilities of corporate citizens.

NSR AND TITLE V PROGRAM APPLICABILITY

For the purpose of adequately estimating the maximum potential emissions from crushing and screening operations associated with coal processing, the DAQ will require the calculation of these emissions based on raw coal input (throughput) to the process. However, as always, where facility specific tests have been conducted in accordance with an approved test protocol, such information is preferable.

CERTIFIED EMISSION STATEMENTS (CES) AND EMISSIONS INVENTORY (EI)

For the purpose of determining fees associated with CES and EI, emission factors based on only tons shipped have been accepted by the DAQ in the past. However, upon further consideration and evaluation, it has been determined that this method is inappropriate because it does not account for the emissions resulting from the crushing and screening of refuse material. For CES and EI, a source can use one of the following two options to estimate actual emissions from crushing and screening operations at coal preparation and handling facilities:

1. As above, using the NSR and Title V applicability determinations which are to be based on raw coal input (throughput) including refuse; or,
2. A source can use the coal emissions factors for crushing and screening based on tons of coal shipped. In addition, the source must quantify emissions associated with the crushing and screening of the refuse material based on nonmetallic minerals processing emission factors for rock crushing and screening. The amount of refuse shall be determined by subtracting the tons of coal shipped from the tons of raw coal input to the process (throughput). This combination of shipped coal plus refuse emissions will be accepted as an adequate estimate of the crushing and screening portion of the facility emissions.

In transition, for the 2001 CES a source may use either of the preceding methods for calculating emissions, or a source may calculate crushing and screening emissions based only on tons of product shipped (as accepted in the past).

Dated: August 7, 2001

John Benedict, Deputy Director