

# Important Information on Reporting and Invoicing

## Sources of Condensable & Filterable Particulate Matter Emissions

### PM and Title V emissions reporting

Facilities subject to Title V FER/EIS emissions reporting must report Total particulate matter (PM) emissions. Certain sources of PM produce PM both as a filterable and a condensable state. Filterable PM is solid or liquid at stack and ambient conditions. Condensable PM is PM that is a vapor at stack conditions but condenses upon cooling and mixing with ambient air to a solid or liquid. The ambient air quality standards for PM (PM<sub>10</sub> and PM<sub>2.5</sub>) include both the filterable and condensable PM fractions because the measurement is made at ambient conditions. U.S. EPA began requiring both fractions in State emission inventories in 2002.

The term used to describe the reported filterable and condensable emissions is "Total PM" (also known as Primary PM). Ohio EPA requires that facilities report Total PM for emissions inventory purposes, *but not for fee purposes* (Ohio EPA currently bills only for the filterable fraction as described in more detail below).

### Is my facility a source of condensable PM emissions?

Facilities that report PM emissions under a Source Classification Code (SCC) that includes emissions factors for condensable and filterable PM, should be aware of the issues surrounding PM reporting and invoicing for emissions fees.

### PM and the problem with STARShip software

The STARShip software, used to create and file the FER and EIS with DAPC, does not have the ability to report filterable and condensable emissions separately. This poses a problem for splitting out the filterable emissions from the condensable emissions in STARShip for fee emissions reporting. STARShip (developed in 1995) is simply not designed to allow users to report the filterable and condensable portions separately within the software. Therefore, PM for the FER and EIS must include the summed total of filterable PM and condensable PM. As indicated above, U.S. EPA began requiring Total PM in emission inventories beginning in 2002. For more information about inventory requirements, go to: <http://www.epa.state.oh.us/dapc/aqmp/eiu/eisqa.html>.

### How DAPC is addressing this problem

As you know, the STARShip software is currently being redesigned. The new system will allow filterable and condensable PM to be reported separately. In order to accurately report Total PM for EIS purposes and not be billed on Total PM for fee purposes, you must report the Total PM (i.e., sum of filterable and condensable PM) in STARShip in the "Particulate Matter" row in the emissions report. In order to create an invoice on filterable emissions only, Ohio EPA must receive data on the filterable reported emissions via a hard copy letter so we can adjust the fee accordingly. As indicated above, if your facility has condensable PM emissions, the summed filterable and condensable fractions must be reported in STARShip as the reported PM for EIS purposes; including the letter that identifies the filterable PM will ensure you are not billed for condensable emissions.

## Why will DAPC adjust the billable PM to “filterable-only” if requested?

DAPC is aware of the uncertainty with respect to information used as the basis for calculating the condensible fraction of PM (see <http://www.epa.gov/ttn/chief/software/fire/pmcalcfactors2fire.pdf> ). Although condensible PM is "Particulate Matter" and is therefore billable under Ohio law, Ohio EPA recognizes that there is uncertainty with respect to emission factors used in calculating the condensible PM emissions for certain source categories. DAPC received feedback accompanying several 2005 emission reports expressing concern with respect to reporting the condensible fraction of PM emissions, the uncertainty surrounding the calculated values, and the practical significant effect the calculated condensible PM fraction would have on invoicing totals for invoicing purposes. After evaluating the concerns raised, DAPC concluded that there was enough uncertainty concerning condensible emissions calculations to warrant billing filterable PM emissions only, if requested.

## What you must do to ensure a proper invoice is generated

The STARShip FER/EIS reports submitted for 2007 should still include the total PM (i.e., the summed amount of filterable PM plus condensible PM) and be accompanied by a letter identifying the total filterable fraction if you do not want to be billed for condensible PM emissions. DAPC will include total PM (the filterable and condensable emissions) reported as the PM values submitted to U.S. EPA as primary particulate matter for emissions inventory purposes consistent with U.S. EPA guidance that is applied to emission inventory submittals.

DAPC will only charge fees only on the filterable PM emissions if specifically requested. DAPC will charge fees based on the total reported PM unless a letter attached to your STARShip receipt is signed by the responsible official as defined in OAC 3745-77-01(GG) and specifies the total filterable fraction of reported PM emissions. The letter must indicate you do not want to be billed for the condensible fraction of the emissions.

Please include a subject line on this letter which states, "**2007 Filterable Particulate Matter**," and direct the attention of this specific letter to:

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| Elisa Thomas<br>Ohio EPA, DAPC-PIER<br>PO Box 1049<br>Columbus, OH 43216-1049 |
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In summary, **to avoid being billed for the condensible PM, the facility must send a letter, as directed above.** DAPC will generate the 2007 FER invoice based on the reported filterable value in lieu of what was reported in STARShip. **If no letter is received with your signed STARS receipt, the total PM value in STARShip will be used for invoicing.**

Any subsequent revisions to the FER/EIS for cy 2005, 2006, or 2007 emissions that affect the reported PM value should follow this same procedure identified above.