

NMED 2023 Emissions Inventory FAQs

1) Who must submit an Air Emissions Inventory?

The National Emissions Inventory (NEI) occurs every three years and an emissions inventory is required from all permitted and registered (Notice of Intent, NOI) facilities. All sources, major, minor, and registrations are required to submit an emissions inventory of actual emissions for the year 2023.

This includes facilities that have a Title V permit, New Source Review (NSR) permit, General Construction Permit (GCP), or Notice of Intent (NOI). The owner or operator of these facilities is required to keep operational records in accordance with 20.2.73.300.C NMAC. The following sources are required to report annually.

- Any source which emits, or has the potential to emit, 5 tons per year or more of lead or lead compounds, or 100 tons per year or more of PM₁₀, PM_{2.5}, sulfur oxides, nitrogen oxides, carbon monoxide, or volatile organic compounds shall submit an emissions report annually.
- Any source defined as a major source of hazardous air pollutants under 20.2.70 NMAC (Operating Permits) shall submit an emissions report annually.
- Any source which is located in an ozone nonattainment area and which emits, or has the potential to emit, 25 tons per year or more of nitrogen oxides or volatile organic compounds shall submit an emissions report annually.

Other sources that are not required to submit by the paragraphs above are required to submit an emissions report upon request by the department. The department currently requests reports for these sources every three years, to coincide with the NEI.

2) How is the NEI year different from other years?

The NEI is a comprehensive estimate of annual air emissions of criteria and hazardous air pollutants (HAPs) from all air emissions sources and is conducted at least every three years. It is primarily based on data submitted by State, Local and Tribal (SLT) air agencies, and supplemented by EPA-developed data. New Mexico submits an emissions inventory for major sources to EPA on an annual basis but has relied upon EPA to develop estimates for minor and area sources. By requesting a Minor Source Emissions Inventory every three years, New Mexico will be able to provide better data for incorporation into the NEI, which is used by EPA in its evaluation of National Ambient Air Quality Standards, assessing interstate transport of air pollutants, and air toxics programs. State and local air agencies also use the NEI for State Implementation Plan (SIP) development, modeling, and the evaluation of pollution control strategies.

3) When are inventories due?

The owner or operator shall submit the emission report by April 1 of each year in which the source is required to submit an emission report. The reporting year is after the inventory year. The online submission tool, AEIR, is available to you for reporting emissions from January 1st.

4) What information must be submitted?

In accordance with 20.2.73.300.C NMAC, owners or operators must include emissions from all routine operations, fugitive emissions, excess emissions, and emissions from malfunctions, startup, shutdown, and maintenance events. For details of other information needed, please refer to the NMAC cited above.

5) What are excess emissions and how do I know if I have them?

When a permit condition or air quality regulation limits the quantity, rate, opacity, or concentration of an air contaminant, then any emissions higher than that limit are excess emissions. Any fugitive emissions are included in calculations for excess emissions. (See 20.2.7.7 NMAC.) Excess emissions from facilities authorized under 20.2.72 NMAC – *Construction Permits* should be reported in your emissions inventory submission.

6) Is AQB collecting greenhouse gases this year?

Yes, we are collecting greenhouse gases (Methane, Carbon Dioxide, and Nitrous Oxide) emissions from reporting facilities and sectors. A GHG emission inventory is required from all facilities that must submit emission inventory for criteria pollutants. To calculate GHG emissions, use 40 CFR 98: [EPA's calculation sheets by subpart link](#). Refer to the Greenhouse Gas Reporting Instructions to report in AEIR are found on this website: <https://www.env.nm.gov/air-quality/ei-submittal/>.

7) Is there a minimum threshold for reporting emissions?

No, there is no official EPA reporting threshold for emission inventory. According to AQB policy, if emissions are 0.1 tons per year or greater of any regulated air pollutant, including VOCs, at a process, then the emissions must be reported. The key exceptions that must be reported at 0.001 tons or greater per process are:

1. Lead, mercury, and chromium
2. Any Hazardous Air Pollutant (HAP) at a facility that is also reported to the Toxics Release Inventory (TRI)
3. Any HAP from glycol dehydration still vents
4. Any HAP from large storage tanks (>500 BBL)

8) What if my actual emissions are higher than the emission limits in my permit?

The actual emissions are still required to be reported in the emission inventory. To find out if these emissions violate your air permit, review the Department's Civil Penalty Policy's Appendix D: Voluntary Environmental Self-Evaluation Policy at <https://www.env.nm.gov/air-quality/civil-penalty-policy/>.

9) What is AEIR and where do I find it?

Air Emissions Inventory Reporting (AEIR) is the online application for reporting emissions. It allows you to import XML files (with emission data) with a specific format. Refer to this website for more information: <https://www.env.nm.gov/air-quality/ei-submittal/>.

10) How can an organization access AEIR?

The link to the instructions to Access AEIR can be found under Instructions to Complete Emission Inventory on this webpage: <https://www.env.nm.gov/air-quality/ei-submittal/>.

11) Can an organization obtain a list of the facilities that must report?

The Emission Inventory Section makes every effort to track facilities' Emissions Inventory reporting requirements; however, it is the owner/operator's responsibility to know which of their facilities must report. Contact us for assistance in identifying your qualified facilities.

12) How can a permit be cancelled or terminated?

A permit action like this requires the use of Permitting Administrative Multi-Use Form (PAM) which can be found at <https://www.env.nm.gov/forms/>.

13) What is the recommended calculation tool?

Calcatenate is an air emission calculation tool designed to simplify and standardize emissions calculations and transfer information between programs. The applications and instructions can be found at <https://www.env.nm.gov/air-quality/calcatenate/>

14) Does each facility (of a specific company) need an oil and gas analysis, or can representative sampling data be used?

A gas and/or oil analysis of the facility or of the regional oil field shall have been conducted not more than one year prior to the EI submission.