

## NMED 2024 Emissions Inventory FAQs

### 1) Who must submit an Air Emissions Inventory (EI)?

Sources that meet the requirements in 20.2.73.300 are required to submit an emissions inventory.

The following sources are required to report emissions:

- 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, PM2.5, 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.

### 2) 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 emission inventory submission tool, AEIR, is available to you for reporting emissions starting January 1<sup>st</sup>, 2025.

### 3) 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.

### 4) 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.

### 5) 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/>.

### 6) 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

7) 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/>.

8) 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/>.

9) 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/>.

10) 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/>

11) 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.