



Emission Inventory Training

Emission Inventory General Overview





Outline

[Emission Inventory Website](#)

[Getting Access to AEIR](#)

[Annual Emission Inventory](#)

[Triennial Emission Inventory](#)

[What to Report on an Emission Inventory](#)

[Actual Emissions vs Theoretical \(Potential or Permitted\) Emissions](#)

[Other FAQs – Non-Operational Facilities and Reporting Thresholds](#)

[Calculation Spreadsheet Requirements](#)

[Methods of Determining Actual Emissions](#)



Navigating to Emission Inventory

Phone: 505-827-2855 | 1-800-219-6157 | Environmental Emergencies: 505-827-9329 (24 hours)

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HOME | ABOUT | LICENSES AND PERMITS | COMPLIANCE AND ENFORCEMENT | PFAS IN NM | FUNDING | ONLINE SERVICES | LIBRARY | PUBLIC PARTICIPATION

CONTACT US
EQUITY
PERFORMANCE
PROGRAMS > AIR > AIR QUALITY BUREAU
ORGANIZATION
CLIMATE >
WATER >
WASTE >
PUBLIC HEALTH >

Home

New Mexico Climate Action

state is pioneering climate solutions

- From NMED website:
 - About ->
 - Programs ->
 - Air ->
 - Air Quality Bureau



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Home / Air Quality Bureau

Air Quality Bureau

[Air Quality Bureau Home](#)

[Air Pollutants](#)

[Air Monitoring](#)

[Permitting](#)

[Planning](#)

[Funding Opportunities](#)

[Emission Inventory](#)

[Modeling](#)

[Compliance and Enforcement](#)

The Air Quality Bureau of the New Mexico Environment Department protects the public health of New Mexicans and the natural beauty of the state by preventing the deterioration of air quality



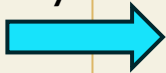
Air Quality contacts

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Select
Emission
Inventory





Emission Inventory Website

Emission Inventory

The Emission Inventory Section collects and examines amounts of emissions from various sources in New Mexico to facilitate planning and modeling of these emissions.

[Emission Inventory Submittal](#) page describes requirements and instructions for submitting emission inventories. Resources for obtaining information from completed inventories are listed below.

- [Air Permit Map \(APMAP\)](#) is an interactive map that displays locations and other information about applications for permits that have been submitted.
- [Air Quality Modeling](#) page contains links to download surrounding sources for modeling.
- [EPA's Air Emissions Inventories](#) page provides inventory data that has been reported to EPA and information about EPA's emission inventory programs.
- [New Mexico 2020 Oil and Gas Greenhouse Gas Inventory](#) summarizes the results of the 2020 Greenhouse Gas Inventory.
- [Emissions Analysis Tool](#) provides emissions inventory data to the public either as a downloadable csv file or on a map.

What is an emission inventory?

The New Mexico Environment Department (NMED) Air Quality Bureau (AQB) is required to conduct statewide emission inventories of criteria and hazardous air pollutants under [20.2.73 New Mexico Administrative Code \(NMAC\) Notice of Intent and Emissions Inventory Requirements](#).

The NMED AQB does not have jurisdiction over facilities in Bernalillo County or on tribal lands; consequently, they are not included in the NMED AQB inventory. The NMED AQB submits the emission inventory electronically to EPA based on a schedule promulgated by EPA and contained in the [Air Emissions Reporting Requirements \(AERR\) | US EPA](#). The EPA hosts the national emissions inventories where you can query specific regions, states, and pollutants at the [2020 National Emission Inventory \(NEI\) Data | US EPA](#).

Why conduct emissions inventories?

NMED conducts emission inventories in order to comply with [state](#) and [federal](#) regulations. The emission inventory is used to develop planning tools and conduct air dispersion modeling. This information is critical to measuring progress in reducing emissions and to provide input for air quality management projects, such as [regional haze](#) and [non-attainment areas](#). The emission inventory is also used to track air quality trends, provide data for the air quality report, and correlate area, industry, and source growth to pollution.



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- ❑ This page has general information about Emission Inventory
- ❑ Use Emission Inventory Submittal link to access AEIR and training materials



Emission Inventory Submittal Website

- Access AEIR from NMED website: env.nm.gov/air-quality/ei-submittal
- Scroll further down page for training materials

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Sign up for emails from NMED

Go to AEIR

Interactive Training



Getting Access to AEIR

- Register for the Secure Extranet Portal (SEP) at:

<https://sep.net.env.nm.gov/sep/login-form>

- Roles in AEIR:

- Facility Admin – An employee of the company who will approve submitters and certifiers for the facility.
- Submitter – An employee, contractor, or anyone who enters emissions information on behalf of the facility.
- Certifier – A company official or Responsible Official. Certifies that submissions are correct.



Annual Emission Inventory

Facilities required to submit an Emission Inventory every year:

- All major and non-major sources that meet the requirements in 20.2.73.300.C NMAC:
 - 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

This includes all major and non-major sources with:

- Air Quality Construction Permits (20.2.72 NMAC or 20.2.74 NMAC), or
- Operating Permits (20.2.70 NMAC), including General Construction Permits (GCP) and sources with Notices of Intent (NOI) (20.2.73.200 NMAC)

Actual Emissions must be reported in AEIR between January 1st and April 1st of the following year

- Example: 2025 Emissions data must be submitted between 1/1/2026 – 4/1/2026



Triennial Emission Inventory

The National Emission Inventory is Every 3 Years

- All facilities with any type of permit or NOI must report actual emissions of year 2026, 2029, 2032, etc

All facilities must report their actual emissions in AEIR for the triennial year between January 1st and April 1st of the following year

- Example: 2026 Triennial data must be submitted between 1/1/2027 - 4/1/2027

Required Recordkeeping

- All facilities must maintain records for facility production, materials processed, materials consumed, and hours of operation



What to Report on an Emission Inventory

Include ALL Emissions in the Emission Inventory Submittal

- Emissions from Routine Operations
- Fugitive Emissions
- Excess Emissions
- Emissions from Malfunctions
- Emissions from Start-up, Shut-down, and Maintenance (SSM) events

Must Report All Emissions Released into the Atmosphere

- If actual emissions are over 100 tons per year (tpy), then you must submit emissions, no matter the permit type, even if it is not a NEI (triennial) year
- If permitted emissions are over 100 tpy, then you must submit emissions annually, even if actual emissions are lower

Report Emissions of all Regulated Air Pollutants and Greenhouse Gases



Actual Emissions

It is VERY important to report Actual Emission Amounts –
NOT Permitted Amounts

Actual Emissions

- Emissions actually released under real operating conditions
- Based on measured operational hours, material usage, and activity data
- Reflects what truly occurred during the reporting period

Theoretical (Potential or Permitted) Emissions

- The maximum possible emissions if the facility operated at full capacity, 24/7, 365 days per year
- Represents the upper regulatory limit or worst-case scenario under the permit
- Used primarily for permitting and compliance determinations, *not* reporting

Why it Matters

- Accurate emissions inventory and compliance records
- Avoids over-reporting to EPA



Other FAQs

What if the Facility did not operate in the Emission Inventory year?

- A facility that did not operate is required to submit an emission inventory if its permit remains active
 - This type of submittal is easy and straightforward: indicate that the facility did not operate and the system will automatically zero out emissions
- To cancel or terminate a permit, you must submit a Permitting Administrative Multi-Use Form (PAM) at <https://www.env.nm.gov/forms>

Is There a Minimum Threshold for Reporting?

- Any regulated air pollutant or VOCs with emissions ≥ 0.1 tpy must be reported
- Key exceptions that must be reported at 0.001 tpy are:
 - Lead, Mercury, and Chromium
 - Any Hazardous Air Pollutant (HAP) at a facility that is also reported to the Toxics Release Inventory (TRI)
 - Any HAP from glycol dehydration still vents



Calculation Spreadsheet Requirements

Include the following for each type of equipment:

- ❑ Emission Factors
- ❑ Calculation Method
- ❑ Actual Parameters Used in Calculation
- ❑ Example Calculation for Each Type of Equipment
- ❑ Gas Analysis
- ❑ Stack Test Results

Very important to submit Actual Emissions and not Permitted Emissions

- ❑ Permitted Emissions are the maximum allowable emissions and are outlined in permits
- ❑ Actual Emissions are measured or calculated
 - Keeping track of operating hours, production rates, and quantities of materials processed, stored, or combusted over the calendar year for each emission unit is useful for these calculations



Methods of Determining Actual Emissions

Tier 1 – Preferred

- Actual Compliance Stack Test
- Continuous Emissions Monitoring (CEMS)

Tier 2

- Process Simulator
- Manufacturer Specification
- Vendor Supplied Emission Factors

Tier 3

- EPA Approved Emission Factor

Tier 4

- TANKS 4.09
- GRI-HAPCalc 3.0 or 4.0
- Vasquez Beggs
- Material Balance (only for construction industry)