

DRAFT

August 14, 2003

EPA/OAR/EMAD Emissions Factors Improvement and Applications Project

Introduction

The Emissions Monitoring and Analysis Division of OAQPS is reviewing and reassessing the current emissions factors development process, documentation, applications, implementation tools, and guidance. This reassessment may lead to significant changes and improvements in how we serve our stakeholders who rely on emissions factors or may be in need of alternative methods to further their respective programs. To conduct this reassessment, we want to talk with you about how your program (or constituents' programs) relies on AP-42, whether and how that program makes use of other resources for developing emissions factors, whether you (or your constituents) produce data that you use in lieu of emissions factors (e.g., testing and monitoring), and what are the areas in which the Agency could improve stakeholder support relative to emissions quantification.

Fact Finding Goals, to learn:

- How emissions factors are used generally;
- What's working and what's not working in using emissions factors;
- Major areas for further exploration;
- Who the major stakeholders are and what are their issues;
- The user community's view of the emissions factors development process;
- How the military and other government facilities' needs in permitting and source monitoring are being met by the emissions factors programs; and
- What interest there is in improving and developing new emissions factors or for developing alternative emissions quantification procedures.

Questions

1. How do you or your constituents use emissions factors (e.g., inventories, permit applicability, compliance)?
2. Are the emissions factors you or your constituents use derived from EPA's AP-42 or other data sources? What are those other sources?
3. Do you use emissions factors from sources other than AP-42 because AP-42 does not provide factors for your source type or for other reasons?
4. To what extent does the use of emissions factors satisfy the needs of the military or other government facilities in your area or constituency in obtaining and complying with

operating, NSR, or other permits and in meeting emissions monitoring needs?

5. Do you or your constituents provide data to EPA for developing emissions factors? What about the process for developing EPA emissions factors enhances or inhibits your participation?
6. Have you, your constituents, or others proposed to use emissions quantification procedures other than emissions factors? If so, why and what were those procedures?
7. Have you, your constituents, or others imposed or had imposed on you the use of emissions factors when there may have been other procedures providing more representative results?
8. If EPA decided not to update AP-42 again, what would your reaction be?
9. Would you consider more direct involvement in an effort to improve emissions factors or in developing appropriate alternatives to emissions quantification by emissions factors? If so, what level of involvement would that be?