

Preparing for Colorado's Toxic Air Contaminant Report

On June 2, 2022, Colorado signed into law HB22-1244. This set the wheels in motion for Colorado to develop an air toxics program to initially include ambient air monitoring and annual Toxic Air Contaminant (TAC) reporting. The TAC reports will inform additional future monitoring and a future air toxics permitting program.

Below are key requirements outlined by this law and how to prepare for the first **June 30, 2024** initial compliance deadline.

Who is impacted by the law?

More than 2,100 facilities statewide are required to report. The law applies to Title V major or synthetic minor air permit holders.

>2,100

Facilities
Statewide



477 TACs are covered by HB22-1244, including 182 pollutants not previously required for Air Pollutant Emissions Notice (APEN) reporting.

477

TACs

Including

182

New
Pollutants



How should emissions be quantified?

Subject facilities must report facility-wide actual emissions for TACs emitted. Facilities should use the following hierarchy of emission factor sources:

- ▶ Site monitoring data
- ▶ Source tests
- ▶ Fuel analysis
- ▶ Manufacturer data
- ▶ Publicly available data (AP-42, EPA, CDPHE)
- ▶ Speciated emissions based on actual emissions of PM or VOC

How can facilities comply?

Report facility-wide actual controlled emissions greater than zero pounds per year and report to two significant digits. No de minimis threshold!

>0 lbs

Per Year



2

Significant
Digits



Submit CDPHE spreadsheet via Google Doc form. O&G sources will submit via "ONGAEIR". For facilities that didn't operate during the reporting year, a notification is still required. Stay consistent with your reporting across air toxics, TRI, emission inventory, APENs, etc.

Air compliance reporting is never an easy task so it's important to get started early and ensure you have a supportive environmental partner.

The Trinity team possesses extensive expertise in air toxics emission calculations and reporting and can assist companies across diverse industry sectors in preparing for new regulatory requirements. If you would like to discuss the new annual TAC reports or other elements of the air toxics program, please contact **Trinity's Denver office** or **Fort Collins office** or call **800.229.6655**.