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The purpose of proposed new rule 18 AAC 50.275(a) is not clear. The Department is currently authorized to require "all stationary sources operating in the state [to] report actual emissions as required under 18 AAC 50 to the department, either upon request or to meet individual permit requirements." How is this new rule not redundant, and how is it necessary?

The requirement at proposed new rule 18 AAC 50.275(b) to "use consistent pollutant-specific emissions factors and calculation methods for all reporting requirements" is extremely vague and potentially problematic. Emission factor selection and emissions calculation methods can vary, appropriately, based on site- and project-specific conditions and are bound by precedence and generally accepted standard practices. Furthermore, emission factors and emissions calculation methods can change over time for legitimate reasons. The Department currently has discretion to accept or reject emission factors and emissions calculation methods; it is unclear what benefit such an unclear regulation provides.

Finally, with respect to expanded electronic reporting, I would request that the Department establish a working group of users to help guide development of new electronic forms. Working with such a group would help ensure that future reporting vehicles deliver efficiencies not only to the Department, but to its clients as well.