

Screening and Risk Assessment			
De minimis emission rate Program Element 16	Significant emission rate Program Element 17	Initial Modeling Program Element 18	Refined Modeling Program Element 19
Include or not?	Include or not?	Include or not?	Include or not?

**Options if facility emits below de minimis rate**

Facility exempt from further requirements?

Require reporting every 5 years, use in statewide emissions inventory?

Include emissions in nearby cumulative source analysis?

Other options?

**Options if facility emits above de minimis emission rate and below significant emission rate**

Facility exempt from further requirements?

Require reporting every 5 years, use in statewide emissions inventory?

Include emissions in nearby cumulative source analysis?

Require cumulative analysis or modeling if in a community with environmental justice concerns?

Require pollution controls or pollution prevention?

Other options?

**Options if facility emits at above significant emission rate and initial modeling shows less than allowable risk level**

Facility exempt from further requirements?

Require reporting every 5 years, use in statewide emissions inventory?

Include emissions in nearby cumulative source analysis?

Require cumulative analysis, refined modeling, or enhanced engagement if in a community with environmental justice concerns?

Require reductions to get below SER including pollution controls, plant-wide emissions offsets, or pollution prevention?

Other options?

**Options if initial modeling shows more than allowable risk level and refined modeling shows less than allowable risk level**

Exempt from further requirements?

Require 5 year emission reporting?

Include emissions in nearby cumulative source analysis?

Require cumulative analysis, refined modeling, or enhanced engagement if in a community with environmental justice concerns?

Require reductions to get below SER including pollution controls, plant-wide emissions offsets, or pollution prevention?

Other options?

**Options if refined modeling shows more than allowable risk level**

Require pollution controls or pollution prevention?

Require periodic evaluation and installation of newly available control technology?

Conduct more accurate and detailed risk analysis?

Do not issue permit?

Other options?



**How to calculate de minimis?**

*Derive de minimis from the RBC*

Include a safety factor for cumulative risk?

**How to calculate SER**

*Derive significant emission rate from the risk based concentration*

Include a safety factor for cumulative risk?

Sum the ratios of each air toxics emission rate/SER. If result is over 1 (or some other chosen value), require modeling?

**Initial modeling**

*Compare results to allowable risk level*

Conservative modeling assumptions?

Include cumulative risk? Background? Cross-media pathways?

**Refined modeling**

*Compare results to allowable risk level*

Include cumulative risk? Background? Cross-media pathways?

Receptor locations? Sensitive populations?

Exposure vs. modeled concentrations?