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Emissions Inventory Confidential Data Help Sheet

How to submit confidential emissions inventory data

Maricopa County Air Quality Department

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Introduction

Information submitted in your annual emissions reports must be made available to the public unless it meets certain criteria described in Arizona Revised Statutes and Maricopa County Rules. Applicable excerpts concerning confidentiality of data are reproduced below.

A.R.S. § 49-487 D. ...the following information shall be available to the public:...

2. The chemical constituents, concentrations and amounts of any emission of any air contaminant. ...

MARICOPA COUNTY AIR POLLUTION CONTROL RULES AND REGULATIONS, Rule 100:

§ 200.126 **TRADE SECRETS** - Information to which all of the following apply:

- a. A person has taken reasonable measures to protect from disclosure and the person intends to continue to take such measures.
- b. The information is not, and has not been, reasonably obtainable without the person's consent by other persons, other than governmental bodies, by use of legitimate means, other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding.
- c. No statute, including ARS §49-487, specifically requires disclosure of the information to the public.
- d. The person has satisfactorily shown that disclosure of the information is likely to cause substantial harm to the business's competitive position.

§ 402 **CONFIDENTIALITY OF INFORMATION:**

402.2 Any records, reports or information obtained from any person under these rules shall be available to the public ... unless a person:

- a. Precisely identifies the information in the permit(s), records, or reports which is considered confidential.
- b. Provides sufficient supporting information to allow the Control Officer to evaluate whether such information satisfies the requirements related to trade secrets as defined in Section 200.107 of this rule.

Task 1: Submitting Confidential Data

Step 1

Access your facility profile in the AQD Online Portal. Go to your facility's Emission Inventory and select the **Process & Emission Detail** screen that the confidential information is associated with. Select **Edit Material/Schedule/Seasons**. When inputting the material and operation details, select **Confidential** for the material throughput information.

→ Process & Emissions Detail

▶ PRC004: Source Classification Code (SCC) is 1-02-006-03

▼ Material Information, Annual Average Operating Schedule & Throughput Percent

Maximum Hours Per Day:	24	* Winter (Jan-Feb, Dec)%:	25
Maximum Days Per Week:	7	* Spring (Mar-May)%:	25
Maximum Weeks Per Year:	52	* Summer (Jun-Aug)%:	25
* Actual Hours:		* Fall (Sep-Nov)%:	25

Material	Action	Throughput	Confidential	Units
Natural Gas Burned			<input checked="" type="checkbox"/>	MILLION CUBIC FEET

Variable Amount in Natural Gas Units & Meaning	
HCg	Gas Heat Content (Btu/Cubic Feet)

Step 2

You will be required to submit a justification to claim confidentiality. Once all the material and operational information is inputted, select **Save**.

Material	Action	Throughput	Confidential	Units
Natural Gas Burned		5.846898	<input checked="" type="checkbox"/> Add Justification	MILLION CUBIC FEET

Throughput Confidential Data Justification

Material: Natural Gas

OK Cancel

Step 3

Next, edit the emissions method. Click **Edit Emissions** at the bottom of the screen. For the method used, select **Emissions** and input the emissions values calculated in the Fugitive Amount column. Indicate in the **Explanation** column that the information is confidential and which calculation spreadsheet was used to calculate the emission value. Attaching this documentation is outlined in the next step. Do not provide an emission factor in the process emissions table.

Process Emissions

Criteria Air Pollutants/Other	Method Used	Hours Uncontrolled	Uncontrolled Emissions Factor (Lbs/Throughput Units)	Time-based Factor (LBS/Hour)	Emissions Reported			Units	Explanation
					Fugitive Amount	Stack Amount	Total		
PM Primary (includes filterables > 10 microns + condensibles)	Emissions		7.6				TONS	Confidential	
PM10 Primary (includes filterables + condensibles)	Emissions		7.6				TONS	add	
PM2.5 Primary (includes filterables + condensibles)	Emissions		7.6				TONS	add	
CO - Carbon Monoxide	Emissions		84				TONS	add	
NOx - Nitrogen Oxides	Emissions		100				TONS	add	
SO2 - Sulfur Dioxide	Emissions		0.6				TONS	add	
VOC - Volatile Organic Compounds	Emissions						TONS	add	
Ammonia	Emissions		3.2				TONS	add	

Step 4

When attaching the calculation documentation, you will need to label it as a **Trade Secret Document**. The Public File to Upload should contain the same information as the Trade Secret Document but with confidential data redacted. This may include material names, annual throughput, and emission factors. Attach the Trade Secret Document and provide the justification.

* Attachment Type: Trade Secret Document

* Description:

* Public File to Upload: Choose File No file chosen

Trade Secret File to Upload: Choose File No file chosen

Trade Secret Justification:

Apply Cancel

Step 5

Submit a letter requesting that the selected processes be held confidential. The letter should provide factual information describing why releasing this information could cause substantial harm to the business's competitive position. This document should be submitted following the same procedure in Step 4. **No data can be held confidential without proper justification.** The department will reply in writing to all requests for confidentiality, detailing which individual data elements for each process have been deemed confidential.