



**DEPARTMENT OF THE AIR FORCE**  
**HEADQUARTERS UNITED STATES AIR FORCE**  
**WASHINGTON DC**

23 Nov 05

MEMORANDUM FOR ALMAJCOM/A7V/A7CV/CEV/MSEV  
10 CES/CEV  
11 CES/CEV

HQ USAF/ILEV  
1260 Air Force Pentagon  
Washington DC 20330-1260

SUBJECT: Clean Air Act (CAA) Metrics Guidance

Reference: HQ USAF/ILEV memo, 14 Feb 05, Revised Environmental Quality Metrics

The referenced memo updated the environmental compliance and pollution prevention metrics to include revised air quality metrics for implementation in FY05. The revised air metrics require the reporting of criteria and hazardous air pollutant emissions on a Calendar Year (CY) basis beginning in CY05. To assist with reporting of said emissions consistently throughout the Department of Defense, the Clean Air Act Services Steering Committee developed the attached guidance. Please instruct your installations to apply the guidance in reporting air quality metric data in the future. If you or the members of your staff have any questions, please contact Mr. Alan Waite, HQ USAF/ILEVQ, DSN 327-0192, e-mail: [alan.waite@pentagon.af.mil](mailto:alan.waite@pentagon.af.mil).

// signed JRC 23 Nov 05 //  
JOHN R. CAWTHORNE, Col, USAF  
Chief, Environmental Division  
DCS/Installations & Logistics

cc:  
SAF/IEE  
HQ AFCEE/TN  
AFCEE-CCR/A/D/S

Attachment:  
CAA Metrics Guidance

**DoD Clean Air Pollution Prevention and Compliance Metrics (CA Metrics); Reporting Guidance**

CA Air Metrics Text	Reporting Guidance
<p><b>II. Clean Air – <i>Enhance Mission Resources</i></b></p> <p>A. <u>Goal</u></p> <ol style="list-style-type: none"> <li>1. Manage air pollutant emissions to protect public health, meet national clean air standards, and maximize operational flexibility</li> <li>2. Make appropriate investments to promote the attainment of National Air Ambient Quality Standards and enhance the training/operations flexibility in maximizing use of air resources</li> <li>3. Leverage energy conservation opportunities</li> </ol> <p>B. <u>Metric</u> – Emissions of criteria air pollutants and hazardous air pollutants; annual cost of managing air pollution and energy reduction achievements.</p>	<p>None required.</p>

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CA Air Metrics Text	Reporting Guidance
<p>C. <u>Activities That Must Report</u></p> <p>1. United States and its territories – all installations that must maintain an inventory of air emissions (actual) to meet Clean Air Act (CAA) requirements, including but not limited to Title V permits and all installations that must report energy reduction in accordance with Executive Order 13123, Greening the Government Through Efficient Energy Management.</p>	<p><b>Which installations must report air emissions?</b></p> <ul style="list-style-type: none"> <li>All installations located within the United States and its territories that collect and report actual emission data from stationary sources collected for the purpose of meeting regulatory requirements.</li> </ul> <p><b>Which installations must report energy reductions?</b></p> <ul style="list-style-type: none"> <li>The DoD Components that report through the existing DoD Annual Energy Management Report (AEMR) process will meet this requirement. The 1978 National Energy Conservation Policy Act, as amended by the 1992 Energy Policy Act and supplemented by Executive Order 13123, requires Federal Agencies to submit annually to Congress, through the Department of Energy, a report on energy management programs. A copy of the report is sent also to OMB.</li> </ul> <p><b>Which installations must report cost of air pollution management?</b></p> <ul style="list-style-type: none"> <li>This requirement (Paragraph D.4, right column) will be met by the DoD Components using the same procedures used to generate the Defense Environmental Quality Program Annual Report to Congress.</li> </ul>

**DoD Clean Air Pollution Prevention and Compliance Metrics (CA Metrics); Reporting Guidance**

CA Air Metrics Text	Reporting Guidance
<p>C. <u>Activities That Must Report (Continued)</u></p> <p>2. Overseas – all installations that must report energy reduction in accordance with Executive Order 13123, Greening the Government Through Efficient Energy Management and installations that have facilities that must measure and meet air pollution requirements defined by the Final Governing Standards (FGS) or international treaties, as applicable.</p>	<p><b>Which installations must report air emissions?</b></p> <ul style="list-style-type: none"> <li>• Overseas – all installations that collect and report actual emission data from stationary sources collected for the purpose of meeting FGS, OEBGD, or international treaties requirements, as applicable.</li> <li>• AEMR does not cover overseas installations, therefore overseas installations are not required to report energy reductions.</li> </ul>

**DoD Clean Air Pollution Prevention and Compliance Metrics (CA Metrics); Reporting Guidance**

CA Air Metrics Text	Reporting Guidance
<p>D. <u>What to Report</u></p> <p>1. Quantity of air pollutant emissions (U.S. and its territories), UNIT – Tons (2,000 pounds per ton):</p> <p>a. Amount of criteria air pollutant emissions. Report the following pollutants:</p> <ol style="list-style-type: none"> <li>1) ozone               <ul style="list-style-type: none"> <li>- volatile organic compounds (VOCs)</li> <li>- nitrogen oxides</li> </ul> </li> <li>2) particulate matter</li> <li>3) nitrogen dioxides</li> <li>4) sulfur dioxide</li> <li>5) carbon monoxide</li> <li>6) lead.</li> </ol> <p>b. Amount of hazardous air pollutants (HAPS) – one total number.</p>	<ul style="list-style-type: none"> <li>• Obtain data only from installations in US and territories <u>required</u> to annually report actual air emissions from stationary sources excluding ODS emissions from refrigeration and fire suppression systems.</li> <li>• Quantity of air pollutant emissions, UNIT – Tons (one ton equals 2,000 pounds).</li> </ul> <p>[Note: Total emissions (for DoD or each Service) cannot be determined from the emission data to be reported because volatile organic HAPs (VOHAPs) are reported twice. VOHAPs would be included in the VOC emissions number and as part of total HAP emissions. The data will allow the determination of total criteria pollutant emissions and total HAP emissions.]</p> <ul style="list-style-type: none"> <li>• Report only emissions from stationary sources.</li> <li>• Report the following pollutants if inventoried:               <ol style="list-style-type: none"> <li>1) Volatile organic compounds (VOCs)</li> <li>2) Nitrogen oxides (NOx)</li> <li>3) Particulate matter (PM10 and PM2.5)</li> <li>4) sulfur dioxide (SO<sub>2</sub>)</li> <li>5) carbon monoxide (CO)</li> <li>6) lead (Pb)</li> <li>7) Amount of hazardous air pollutants (HAPs) – cumulative total for all HAPs.</li> </ol> </li> </ul>

**DoD Clean Air Pollution Prevention and Compliance Metrics (CA Metrics); Reporting Guidance**

<b>CA Air Metrics Text</b>	<b>Reporting Guidance</b>
<p>2. Amount of regulated air pollutant emissions identified by FGS (overseas), UNIT – Tons (2,000 pounds per ton).</p>	<ul style="list-style-type: none"> <li>• Obtain data only from overseas installations required to annually report actual air emissions from stationary sources, excluding ODS emissions (from refrigeration and fire suppression systems) and greenhouse gas emissions.</li> <li>• UNIT – Tons (one ton equals 2,000 pounds).</li> <li>• Pollutants reported shall be the criteria pollutants, HAPs and other pollutants required to be inventoried in FGS. Identify pollutants using standard chemical names.</li> </ul>
<p>3. Energy Reduction, UNIT – British Thermal Units per Gross Square Foot (BTUs/GSF) – Energy management data reported to the Office of the Deputy Under Secretary of Defense (Installations &amp; Environment) to meet the requirements of Executive Order 13123, Greening the Government Through Efficient Energy Management.</p>	<p>Energy reductions shall not be reported and shall be excluded from any reporting tool created for installations to submit their data for the MOM. The energy use information shall be obtained from the personnel who maintain the DUERS or other equivalent centralized systems used by the Services.</p>
<p>4. Cost of air pollution management as reported in President’s Budget (Exhibit PB-28), UNIT – Thousands of Dollars (\$):</p> <ul style="list-style-type: none"> <li>a. Non-Recurring Compliance Investment – Clean Air Act.</li> <li>b. Non-Recurring Pollution Prevention Investment – Clean Air Act.</li> </ul>	<p>This cost data shall not be reported. It shall be collected directly from the PB-28. Compliance cost information should be gathered as it has been in the past by the Services for the Office of the Deputy Under Secretary of Defense (Installations and Environment) in preparing the Defense Environmental Quality Program Annual Report to Congress.</p>
<p>E. <u>Reporting Period</u> – Calendar Year.</p>	<p>For an IPR data call for emissions information an appropriate reporting deadline would be 31 August of the subsequent calendar year. The DoD Environmental Management Review in December of each year will include emission data from the previous calendar year.</p>

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F. <u>Potential Data Sources</u> 1. President's Budget (Exhibit PB-28). 2. DoD Annual Energy Management Report.	These sources should continue to be used by Service HQ/DoD as the source of information for energy reductions and CAA program costs.