

CHAPTER 8—QUESTIONS ANSWERED: EMISSION EVENTS, EXCESS OPACITY EVENTS, SMSS ACTIVITIES

Site Quantifiable Event Totals

Why are the site quantifiable event totals required to be reported in the EI?

The total number of reportable and nonreportable EE and SMSS events are required to be reported per 30 TAC 101.201 and 101.211 respectively.

Where must I report the total number of reportable and nonreportable EE and SMSS activities?

On page 3 of the EIQ or the Account Emissions page for an initial EI submission.

Where must I report the total number of excess opacity events?

On page 3 of the EIQ or the Account Emissions page for an initial EI submission.

What is the difference between a reportable and a nonreportable EE or SMSS release?

Reportability depends on whether emissions exceed a reportable quantity, which in turn depends on the contaminant released and the discharge location. Refer to 30 TAC 101.1(88) for chemical specific reportable quantities. A reportable release is an emissions release equal to or greater than the reportable quantity for a contaminant. For additional assistance with determining if a release is reportable, please contact your regional office.

I know I have to report my permitted emissions from SMSS activities as annual tons per year in the EI. Do I include the number of permitted SMSS activities in the total reportable or nonreportable SMSS activities on page 3 of the EIQ?

No, permitted SMSS activities should not be included in the total reportable or nonreportable SMSS activities on page 3 of the EIQ.

Reporting EE and SMSS Emissions

I reported my EE and SMSS tons per year on page 3 of the EIQ. Do I have to include the EE and SMSS amounts in tons per year at a specific path or paths in the EI?

Yes, in order for the emissions from EE and SMSS activities to be updated in the STARS database, the emissions must be reported at the specific path in the EI. The emissions on page 3 of the EIQ are sitewide totals and are not data-entered.

Do I include EE and SMSS releases when determining ozone season emissions in pounds per day (ppd)?

Ozone season emissions should only be based on the emissions reported in the “Annual” tpy column. If your SMSS releases are permitted, these emissions should be reported in the “Annual” tpy column, and therefore included in the “Ozone” ppd column.

Can I add a separate path to my EI to report all EE and SMSS activities, instead of specifying the EE and SMSS activities on specific paths?

The EAS would prefer that you do not have a separate path solely for EE and SMSS emissions. Instead, report these emissions at the actual paths where they occurred. If the EE and SMSS activities are permitted under a single site-wide cap, it may be appropriate to add a separate path. For specific questions, please contact the EAS.

The emissions from SMSS releases at my site are permitted. Where should these permitted SMSS releases be reported in the EI?

Emissions from SMSS activities authorized by a New Source Review permit or by a permit by rule should be reported as annual emissions and should not be included in the “SMSS” column (which is only for emissions from SMSS activities that are not authorized by a permit).

Do I have to report the emissions from nonreportable EE or SMSS releases in the EI?

Yes, report the total emissions in tons per year from all EE releases or SMSS activities at each FIN/EPN path, regardless of whether those releases represent reportable or nonreportable quantities.

I have several pieces of equipment that start and stop for maintenance several times a day. Over the course of a year, this can result in thousands of SMSS activities with minimal emissions (for example, last year there were 1506 activities). These emissions are nonreportable and are not permitted. Do I have to report the emissions from the SMSS activities as a tpy emission quantity in the EI? Do I have to include these activities in the number of nonreportable SMSS activities on page 3 of the EIQ?

Yes, all emissions from SMSS activities must be reported in the EI, regardless of whether they are reportable or nonreportable. The emissions are to be reported in the SMSS column at the FIN/EPN path in the EI because the emissions are not permitted. Include the 1506 activities in the total number of the nonreportable SMSS activities on page 3 of the EIQ.

How do I estimate emissions during maintenance, startup, and shutdown activities?

Please use the best emissions determination methods available, such as good engineering practices, process knowledge, or test data.

Where would emissions from maintenance activities that were not scheduled be reported? What exactly does “scheduled” mean?

Report the emissions from any MSS activity that was not scheduled in the “EE” column at the FIN/EPN path in the EI. Scheduled MSS activities as defined in 30 TAC 101.1(90) are those for which the region is notified in advance, per 30 TAC 101.211.

Excess Opacity**Excess opacity is permitted as a percentage. Can I report my excess opacity events in the EI as a percentage?**

No. However, if excess emissions were associated with the excess opacity event, those emissions must be calculated and reported in the “EE” column in tons per year at the applicable FIN/EPN path.

I had an excess opacity event with associated emissions. How do I determine those emissions?

Use the best emissions determination method available, such as process knowledge, past engineering analysis, or testing to calculate and report the emissions at the specific path in the EI.

Emissions Event Certification**When is a signed Emissions Event Certification required?**

When **no** emissions events occurred at the site. The signature certifies that no emissions from emissions events occurred during the EI reporting year, per Texas Health and Safety Code 382.0215(f).

My excess opacity event was not associated with the release of emissions and no emissions from EE occurred at my site during the reporting year. I reported the number of excess opacity events on page 3 in the EIQ. Do I have to submit a signed Emissions Event Certification?

Yes, since the site experienced no emissions events.