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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 31, 2011

Attn: Air Emissions Inventory Contact
Company Name
Address
Address Line 2
City, State Zip

Re: Submission of Calendar Year 2011 Air Emissions Inventory Information for
Regulated Entity: RNXXXXXXXXX Air Account: XXXXXX

Dear Emissions Inventory Questionnaire Recipient:

The Texas Commission on Environmental Quality (TCEQ) is requesting that you submit a completed calendar year 2011 air emissions inventory (EI) for the regulated entity identified above. Per Texas Health and Safety Code, §382.014, the TCEQ has the authority to request a regulated entity to submit air emissions data to develop a statewide air emissions inventory. Per 30 Texas Administrative Code §101.10, the completed EI is required to be submitted by March 31, 2012, or 90 days from the date of this letter, whichever is later.

A paper copy of the Emissions Inventory Questionnaire is not included with this letter. Enclosed is the "Emissions Inventory Reporting Options" which provides instructions for obtaining a printable copy of your Emissions Inventory Questionnaire through e-mail, information on obtaining an electronic EIQ extract file, submitting the 2011 STARS electronic-formatted EI text file through the State of Texas Environmental Electronic Reporting System (STEERS) Web interface, and updating the EI online manual entry through the STEERS Web interface. The second enclosure titled "Information for the 2011 Emissions Inventory Request" provides instructions for obtaining a copy of the *Emissions Inventory Guidelines* and additional guidance for completing a 2011 EI.

If you have questions, please call the Emissions Assessment Section help-line at (512) 239-1773.

Sincerely,

Kevin Cauble, Manager
Emissions Assessment Section
Air Quality Division

KC/MS/rs

Enclosures

Information for the 2011 Emissions Inventory (EI) Request

Why the regulated entity received this EI request:

The Texas Commission on Environmental Quality (TCEQ) is responsible for compiling and reviewing information regarding emissions from stationary sources in Texas. The regulated entity described in the enclosures of this letter may have received this formal written request because:

- the regulated entity meets the reporting requirements of 30 Texas Administrative Code (TAC) §101.10(a)(1)-(3) for submitting an EI; or
- the regulated entity is being requested to submit an EI under the special EI provisions of 30 TAC §101.10(b)(3).

The official version of 30 TAC §101.10 is located at the Secretary of State's Web site at <http://www.sos.state.tx.us/tac/index.shtml>.

If you have received this request to submit a calendar year 2011 air EI, you have been formally notified that the TCEQ is conducting a special EI for lead and ozone precursors under the authority of 30 TAC §101.10(b)(3). A completed EI must be submitted by the owner or operator of:

- a regulated entity that emits 0.5 ton per year (tpy) of lead emissions during normal operations or has the potential to emit 5 tpy of lead emissions; and/or
- a regulated entity that is located in Bastrop, Bexar, Caldwell, Comal, El Paso, Gregg, Guadalupe, Hardin, Harrison, Hays, Henderson, Hood, Jefferson, Orange, Nueces, Rusk, San Patricio, Smith, Travis, Upshur, Victoria, Williamson, or Wilson County and that emits 10 tpy of volatile organic compounds or 25 tpy of nitrogen oxides during normal operations.

If the regulated entity described in the enclosures of this letter meets the reporting requirements of 30 TAC §101.10(a)(1)-(3) or is requested to submit a special EI, a completed EI must be submitted. Otherwise, a signed written statement explaining why the referenced regulated entity does not meet the EI reporting requirements must be submitted by the due date. The completed EI or signed written statement must be received by the TCEQ by March 31, 2012, or within 90 days of the request, whichever is later.

2011 EI Guidelines: What's new?

The *Emissions Inventory Guidelines* exists as two documents. The *2011 Emissions Inventory Guidelines* provides guidance for understanding the emissions inventory reporting requirements and explains how to create a complete EI. The *2011 Emissions Inventory Forms and Instructions* provides instructions for completing EI forms, blank forms, and a list of abatement and contaminant codes. Some of the new requirements and considerations are:

- a reminder that all electronic emissions inventories must be submitted through the State of Texas Environmental Electronic Reporting System (STEERS) (Chapter 1);
- additional information on how to submit an Annual EI Update through online data entry (Chapter 1);

- updated requirements for adding sources with individual or aggregate hazardous air pollutant (HAP) emissions to an EI if the HAP is listed in any TCEQ-enforceable document (Chapter 3);
- additional information on the EI structure of glycol still units with flash tanks (Chapter 3);
- updated information on using stack test data for units in the TCEQ Emissions Banking and Trading program (Chapter 4);
- clarification on the determination methodology code when using the E&P Tank Program (Chapter 4);
- information on how to obtain a printable version of the EI to update and submit to the TCEQ (note: hard copy submissions are still accepted) (Chapter 6);
- a reminder that pages printed from STEERS should not be submitted when EI revisions are required (Chapter 7);
- additional information on how to obtain an extended gas analysis for emissions determination from glycol dehydration operations (Appendix A);
- information on amine units in carbon-dioxide service (Appendix A);
- information on the results of the TCEQ 2010 Flare Study (Technical Supplement 4);
- updated information on how to determine accurate emissions determinations from TANKS 4.09d (Technical Supplement 6);
- considerations for obtaining accurate emissions determinations from TANKS 4.09d (Technical Supplement 6);
- updated considerations for obtaining accurate emissions determinations from the E&P TANK program (Technical Supplement 6); and
- updated information about determining emissions from pressure tanks and the degassing and cleaning of tanks (Technical Supplement 6).

The TCEQ is not including the *2011 Emissions Inventory Guidelines* or the *2011 Emissions Inventory Forms and Instructions* with this package. These documents are available for download from the TCEQ Web site at <http://www.tceq.texas.gov/goto/ieas>. To receive a paper copy, please contact the TCEQ's Publications staff at (512) 239-0028.

Emissions Inventory (EI) Reporting Options

Option One: Submit your emissions inventory questionnaire (EIQ) online using an interactive Web site

Regulated entities can submit a 2011 EIQ through the State of Texas Environmental Electronic Reporting System (STEERS) Web interface. Regulated entities can choose the "EIQ Entry" option in the Annual Emissions Inventory Report program area of STEERS to manually create or update and submit a 2011 EIQ.

Additional information can be obtained from the document titled "On-line Annual Emissions Inventory Report User's Guide" available at:

<http://www.tceq.texas.gov/goto/ieas>

Option Two: Submit an electronic EIQ text file online using STEERS

Regulated entities can submit a 2011 State of Texas Air Reporting System (STARS) electronically formatted EI (EIQ text file) through the STEERS Web interface.

Regulated entities can choose the "Upload File" option in the Annual Emissions Inventory Report program area of STEERS to submit the STARS EIQ text file.

PLEASE NOTE: Electronically formatted EI submissions will only be accepted *through the STEERS Web interface*. **To obtain the 2011 EIQ Extract File for a site, use the following link:**

ftp://ftp.tceq.texas.gov/pub/AirQuality/EmissionsAssessment/2011_EIQ_Extract_Files/

No updates have been made to the STARS electronic EI reporting system for reporting year 2011. Regulated entities can use the following as resource documents for submitting EIQ text files through the STEERS Web Interface. They include the "Electronic Emissions Inventory File Specifications," "Electronic Emissions Inventory File Specifications Appendices," and the zip file entitled "Electronic Emissions Inventory File Specifications Reference Tables." These resources are available at:

<http://www.tceq.texas.gov/goto/ieas> under the section titled "Emissions Inventory Documents."

Option Three: Download and print a paper EIQ report from the Central Registry Web site and submit an updated hardcopy EIQ report

The TCEQ will continue to accept paper EIQ submissions. However, for the 2011 and subsequent EI reporting years, the TCEQ will not mail paper EIQs. Instead, regulated entities can generate a printable EIQ report by accessing the EIQ Report option through the Central Registry's Integrated Web Reporting Page. Regulated entities can choose the 2010 calendar year EIQ report and have it sent via e-mail to the requestor to be used to complete your paper submission for calendar year 2011 emissions. For more information, please see "Instructions for Obtaining a Printable Copy of the EIQ Report" located at: www.tceq.texas.gov/goto/eiqprint