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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 31, 2015

CONTACT or Air Emissions Inventory Contact
COMPANY
ADDRESS 1
ADDRESS 2
CITY, STATE ZIP

Re: Calendar Year 2015 Air Emissions Inventory Information for
Regulated Entity: **REGULATED ENTITY NO**

Air Account: **ACCOUNT NO**

Dear Emissions Inventory Contact:

This letter provides notification from the Texas Commission on Environmental Quality (TCEQ) that a Calendar Year 2015 air emissions inventory (EI) for the regulated entity identified above may be required, per the reporting requirements of 30 Texas Administrative Code (TAC) §101.10. 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 TAC §101.10, either a Calendar Year 2015 EI or written notification that the above referenced site is not subject to the EI reporting requirements is required to be submitted by March 31, 2016, or 90 days from the date of this letter, whichever is later.

The required method for submitting an EI is through the State of Texas Environmental Electronic Reporting System (STEERS)-Air Emissions Inventory Web-EI (AEIR) system, using either the interactive Web entry or text file upload. Enclosed please find the "Emissions Inventory Reporting Options" that provides information on the two STEERS-AEIR reporting options. The second enclosure titled "Information for the 2015 EI Request" provides instructions for obtaining a copy of the *Emissions Inventory Guidelines*, a list of updates for 2015, Special Inventory notice, and additional guidance for completing a 2015 EI.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Kevin Cauble", enclosed in a rectangular box.

Kevin Cauble, Manager
Emissions Assessment Section
Air Quality Division

KC/JD/rs

Enclosures

Emissions Inventory (EI) Reporting Options for the 2015 Emissions Inventory

Option One: Submit your EI online using the State of Texas Environmental Electronic Reporting System (STEERS) interactive website (Web entry method)

Regulated entities can submit a 2015 EI through the 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 2015 EI.

Initial emissions inventories can be submitted using the online Web entry method. If the regulated entity has never submitted an EI, please contact the Texas Commission on Environmental Quality (TCEQ) Emissions Assessment Section Help Line at 512-239-1773 for assistance.

Option Two: Submit an EI text file online using STEERS (text file upload method)

Regulated entities can submit a 2015 State of Texas Air Reporting System (STARS) formatted EI 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 EI text file.

PLEASE NOTE: Electronically formatted EI submissions will only be accepted *through the STEERS Web interface*. **To obtain the 2015 EIQ Extract File for a site, use the following link:**

<https://www.tceq.texas.gov/airquality/point-source-ei/emissions-inventory-extracts-for-electronic-reporting>

Guidance documents and tools for both Web-reporting options are available at <http://www.tceq.texas.gov/goto/ieas>.

Information for the 2015 Emissions Inventory (EI) Request

Why the regulated entity received this EI notification:

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 notification because:

- the regulated entity meets the reporting requirements of 30 Texas Administrative Code (TAC) §101.10(a)(1)-(4) 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.texas.gov/tac/index.shtml>.

If you have received this notification to submit a calendar year 2015 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, McLennan, 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)-(4) 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, 2016, or within 90 days of the request, whichever is later.

2015 Emissions Inventory Guidelines: What's new?

The *2015 Emissions Inventory Guidelines* provides guidance for understanding the emissions inventory reporting requirements and explains how to correctly complete an EI. The Emissions Assessment Section (EAS) Web page (<http://www.tceq.texas.gov/goto/ieas>) provides additional helpful sources such as instructions for Web-EI Reporting, lists of abatement and contaminant codes, and forms to update certain structure changes that cannot be completed using the Web-EI system.

Some of the updates and considerations to the *2015 Emissions Inventory Guidelines* include:

- removed references to paper reporting from the entire document;
- clarification that insignificant change notification requirements apply to each criteria pollutant (Chapter 1);
- using the document attachment function in the Web-EI system to submit non-confidential sample calculations and supporting documentation (Chapters 1 and 2);
- instructions to contact the EAS if averaging stack test data for hazardous air pollutants from electronic generating units (Chapter 4);
- clarification that the volatile organic compound (VOC) speciation requirements are for non-combustion sources and undestroyed VOC from flares and other combustion abatement devices (Chapter 4, Table 4-4);
- clarification that for any of the determination methodologies, data from a current year must not be used to report or revise emissions for any previous year's emissions inventory (Chapters 4 and 7);
- choosing the correct determinant methodology of "scientifically calculated" when a process simulator was used to determine emissions (Chapter 4)
- choosing the correct determination methodology when half the detection limit was used to determine emissions (Chapter 4);
- choosing the determination method for sulfur dioxide emissions from internal and external combustion (Technical Supplement 1);
- clarification that the TCEQ flare emission factors are preferable to AP-42 Section 13.5 factors to determine nitrogen oxides and carbon monoxide emissions (Technical Supplement 4);
- clarification that VOC emissions from flares should not be determined using the AP-42 Section 13.5 total hydrocarbon or VOC emission factors (Technical Supplement 4);
- removed requirement of annual reporting of the number of emissions events and maintenance startup, shutdown activities from the Inapplicability Notification letter; (Appendix B);
- new *Path Deactivation* form for structure changes that cannot be updated in Web-EI system, which can be found on the EAS Web page (<http://www.tceq.texas.gov/goto/ieas>); and
- new *Paper EI Reporting Instructions* document for special cases when prior approval for paper reporting was obtained by the EAS, which can be found on the EAS Web page (<http://www.tceq.texas.gov/goto/ieas>).

The TCEQ is not including the *2015 Emissions Inventory Guidelines* with this package. This document is available for download from the EAS Web page at <http://www.tceq.texas.gov/goto/ieas>. To receive a paper copy, please contact the TCEQ's Publications staff at (512) 239-0028.