TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Instructions for Section 185 Fee Program Baseline Amount Determination Forms

Under 30 Texas Administrative Code Section 101.106

DRAFT

Contents

Background ..... **Error! Bookmark not defined.**

About These Forms and Instructions 1

Applicability 1

Baseline Amount under 30 TAC §101.106 1

Aggregation for Baseline Amount Determination under 30 TAC §101.107 2

Subsequent Fee Calculation 2

Required Forms 3

Submitting the Forms 4

Section 185 VOC Baseline Amount Request Form 4

- Section A: Customer Information 4
- Section B: Section 185 Contact Information 5
- Section C: Baseline Amount Worksheet 5
  - Table C1. Compare VOC Emissions 5
  - Table C2. Determine Baseline Amount 6
- Section D: Certifications 6
- Attachment 1: Authorizations 7

Section 185 NO_X Baseline Amount Request Form 8

- Section A: Customer Information 8
- Section B: Section 185 Contact Information 8
- Section C: Baseline Amount Worksheet 8
  - Table C1. Compare NO_X Emissions 8
  - Table C2. Determine Baseline Amount 9
- Section D: Certifications 10

DRAFT

Attachment 1: Authorizations 10

Section 185 Baseline Amount Request Form for Aggregating VOC with NO_X 11

Section A: Customer Information 11

Section B: Section 185 Contact Information 11

Section C: Baseline Amount Worksheet 11

Table C1. Compare NO_X Emissions 11

Table C2. Determine Baseline Amount 13

Section D: Certifications 13

Attachment 1: Authorizations 13

Mailing Instructions 13

Contact Us 13

Examples of Completed Forms 15

Example 1: One Site Determining a Baseline Amount for VOC 15

Example 2: Two Sites Aggregating Baseline Amounts for NO_X 16

Example 3: Three Sites Aggregating VOC and NO_X Baseline Amounts 17

DRAFT

Background

Sections 182 and 185 of the Federal Clean Air Act (FCAA) require that states with severe and extreme ozone nonattainment areas submit a revision to the state implementation plan that assesses fees on certain major stationary sources if the area fails to attain the ozone National Ambient Air Quality Standard (NAAQS) by the applicable attainment date.

The Houston-Galveston-Brazoria (HGB) area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties) was originally classified as severe for the one-hour ozone NAAQS and was required to attain this standard by November 15, 2007. A finding of failure to attain notice was published on February 1, 2012 for the HGB one-hour nonattainment area, and the area is currently not attaining the one-hour NAAQS.

About These Forms and Instructions

These forms and instructions are intended for reporting a baseline amount for one or more major stationary sources under 30 Texas Administrative Code (TAC) Section (§) 101.106 (Baseline Amount Calculation) or §101.107 (Aggregated Baseline Amount). If a major stationary source had a permit that was administratively complete but not issued by the attainment date, an alternative baseline amount under 30 TAC §101.108 may be requested. To request an alternative baseline, please see "Alternative Baseline Forms" at http://www.tceq.texas.gov/airquality/point-source-ei/sipsection185.html.

Applicability

This fee program applies to all regulated entities (REs) that are major stationary sources of volatile organic compounds (VOC) emissions or nitrogen oxides (NO_X) emissions in the HGB one-hour ozone nonattainment area on or after November 15, 2007. For the HGB one-hour ozone nonattainment area, a major stationary source is any RE with actual or potential emissions of 25 tons per year of either VOC emissions or NO_X emissions. An RE can be classified as a major stationary source for either of the two pollutants or for both pollutants. A baseline amount determination is required from any RE that is a major stationary source for either VOC or NO_X.

Baseline Amount under 30 TAC §101.106

The baseline amount is the lower of the baseline emissions or authorized emissions in the attainment year which is 2007 for the HGB one-hour ozone nonattainment area. This lower amount is referred to as the "basis" of the baseline amount. Major stationary sources that have irregular, cyclical operations or have emissions that vary significantly from year to year may select a consecutive 24-month period between 2003 through

2007 for electric utility steam-generating units (EGU) and between 1998 through 2007 for non-EGUs for determining annual baseline emissions. The year 2007 or the 24-month consecutive period used for the basis of is referred to as the "period."

Aggregation for Baseline Amount Determination under 30 TAC §101.107

In accordance with §101.107, there are several aggregation scenarios allowed under this program.

Table 1. Baseline Amount Aggregation Scenarios and Corresponding Basis and Period Requirements

Aggregation Scenario	Basis and Period
None; VOC and NO_X emissions are not aggregated at a major stationary source.	A separate basis and period can be used for each pollutant.
VOC emissions are aggregated with NO_X emissions at a major stationary source.	The basis and the period must be the same for both pollutants.
VOC emissions are aggregated from more than one major stationary source. NO_X emissions are not aggregated with NO_X emissions from other major stationary sources.	The basis and the period must be the same for the VOC emissions from all major stationary sources in the group. Each major stationary source may maintain its own separate basis and period for the NO_X baseline amount.
VOC emissions are not aggregated with VOC emissions from other major stationary sources. NO_X emissions are aggregated from more than one major stationary source.	A separate basis and period can be used for the VOC baseline amount. The basis and the period must be the same for the NO_X emissions from all major stationary sources in the group.
VOC emissions are aggregated with NO_X emissions from more than one major stationary source.	The basis and the period must be the same for both pollutants at all major stationary sources in the group.

Subsequent Fee Calculation

Any subsequent fees will use the same method of aggregation selected by the company for the baseline amount. Thus, if a company aggregated several major stationary sources of VOC to determine an aggregated VOC baseline amount, then all VOC emissions from all major stationary sources in that group will be used to estimate a fee – even if one of the stationary sources is no longer major. The first fee will be for calendar year 2012 emissions and will be based upon annual emissions; maintenance, start-up, and shutdown (MSS) emissions; and emissions from emissions events in excess of 80% of the baseline amount for the group.

Required Forms

The forms are available for download from http://www.tceq.texas.gov/airquality/point-source-ei/sipsection185.html. There are three forms for determining a baseline amount: a form for VOC emissions, a form for NO_X emissions, and a form for combining VOC and NO_X emissions. The forms may be used for one major stationary source or a group of major stationary sources. Please also see forms for alternative baselines that are allowed under 30 TAC §101.108.

As noted previously, the forms are designed to accommodate a single major stationary source or multiple major stationary sources that are aggregated into one group for purposes of Section 185 baseline amount determination. Each form submitted will result in the creation of a Section 185 Account Number.

Table 2. Baseline Amount Aggregation Scenarios and Corresponding Forms Required

Aggregation Scenario	**Section 185 Account Baseline Amount Determination Forms Needed**
None; a major stationary source will maintain VOC and NO_X baselines separately.	Two separate Section 185 Account Numbers will be assigned – one for the VOC baseline and one for the NO_X baseline. Complete a Section 185 Baseline Amount form for VOC and a second Section 185 Baseline Amount form for NO_X.
A major stationary source will combine the VOC baseline amount with the NO_X baseline amount.	One Section 185 Account Number will be assigned for the aggregation of VOC and NO_X baseline amounts. Complete one Section 185 Baseline Amount form for Aggregated VOC and NO_X.
VOC baseline amounts are aggregated from more than one major stationary source. NO_X is not aggregated with NO_X at other major stationary sources.	Two forms are required and two separate Section 185 Account Numbers will be assigned. One Section 185 Account Number will be assigned for the VOC group. Complete a Section 185 VOC Baseline Amount form for the VOC baseline for this group. List all regulated entity reference numbers (RNs) for each major stationary source in the VOC group on the form. A separate Section 185 Account Number will be assigned for the NO_X baseline amount at the major stationary source. Complete a Section 185 NO_X Baseline Amount form for the single major stationary source.
VOC is not aggregated with VOC at other major stationary sources.	Two forms are required and two separate Section 185 Account Numbers will be assigned.

NO_X is aggregated with NO_X at one or more other major stationary sources.	One Section 185 Account Number will be assigned for the VOC baseline amount at the major stationary source. Complete a Section 185 VOC Baseline Amount Form for the single major stationary source. Complete a second Section 185 NO_X Baseline Amount form for the NO_X baseline amount for the group. List all RNs for each major stationary source in the NO_X group on the form. A Section 185 Account Number will be assigned to the NO_X group.
VOC is aggregated with NO_X at more than one major stationary source	Complete one Section 185 Baseline Amount form for Aggregated VOC and NO_X and list all RNs for major stationary sources on the form. One Section 185 Account Number will be assigned for the aggregated VOC and NO_X baseline for this group of sources.

Submitting the Forms

The TCEQ will electronically load the baseline amount data into a database. Certifications are also required for the data. An electronic copy and a printed/signed copy of the completed form(s) are required to be submitted.

1. Save the appropriate form(s) to your computer.
2. Complete the form(s) using the electronic template (do not print and complete).
3. Print and sign the completed form(s).
4. Save a copy of the completed electronic form(s) on a compact disc (CD).
5. Mail the signed, completed forms and the CD to the TCEQ.

Section 185 VOC Baseline Amount Request Form

Section A: Customer Information

1. **Customer Reference Number (CN):** The number assigned by the TCEQ to an individual or business that is responsible for one or more regulated entities. For example, the organization or individual that owns or operates a site or facility. This CN identifies the customer for either the major stationary source or the group of major stationary sources that will be aggregated under a baseline amount.

2. **Customer Name:** Name of the owner or operator responsible for submitting the Section 185 fee program information.

Section B: Section 185 Contact Information

Note: This information must be associated with an RE and cannot belong to a consulting firm, law office, etc.

3. **First Name:** The first name of the company employee who will serve as the contact for items related to the Section185 fee program.

4. **Last Name:** The last name of the company employee who will serve as the contact for items related to the Section185 fee program.

5. **Title:** The job title of the Section 185 fee program contact.

6. **Mailing Address:** The address where correspondence related to the Section 185 fee program can be sent.

7. **Business Address:** The Section 185 contact's physical address if different from the mailing address.

8. **Telephone and Fax Numbers and E-mail Address:** Contact information for the Section 185 contact.

Note: Only one Section 185 contact person can be listed per form. If multiple REs are aggregated on a form, the contact person listed will be considered the Section 185 contact for all REs in the Section 185 account.

Section C: Baseline Amount Worksheet

Table C1. Compare VOC Emissions

List the RE for each major stationary source that will be aggregated into a group. If no aggregation is being requested, list only one RE. Include the following information for each major stationary source listed:

9. **Regulated Entity Reference Number (RN):** The number assigned by the TCEQ to a location where a TCEQ-regulated activity occurs. If an RN has not already been assigned, complete a Core Data form and submit it to Central Registry. Submit a copy of this form with the Baseline Amount Determination Form.

10. **Site Name:** The name of the RE.

11. **SIC:** Standard Industrial Classification (SIC). Include the four-digit numeric code that best describes the RE's primary business activity and operations.

12. **Baseline Emissions:** The total annual and maintenance, planned startup, and shutdown (MSS) emissions in tons per year as reported in the annual emissions inventory. Planned MSS are authorized and may have been reported as annual emissions in the emissions inventory. Do not include non-compliant emissions that

occurred while the source was operating above an emissions limitation that was legally enforceable in this estimate.

The baseline emissions are either annual emissions reported in the 2007 emissions inventory or if the source has intermittent, irregular, or cyclic operations or have emissions that vary significantly a consecutive 24-month period between 2003 and 2007 for EGFs and between 1998 and 2007 for non-EGFs may be chosen. The baseline emissions must be adjusted downward to account for source-specific emissions limits in effect in the attainment year. In other words, if a unit's emissions during the 24-month period exceeded an emissions limit in effect in 2007, the source's baseline emissions must reflect compliance with that limit and be calculated in accordance with that limit.

All emissions and REs reported within a form must use the same basis and period.

13. **Authorized Limit:** The sum of the annual limit at each major stationary source effective in the attainment year. All authorizations may be included, including limits from permits-by-rule.

14. **Total:** The sum of all reported baseline emissions and the sum for the reported authorized limits.

15. **Period:** The period used for determining the baseline emissions. If the baseline year, 2007, is used, 2007 would be reported. If a historical 24-month time period is used, report the start date in month, day, and year (mm/dd/yyyy) and the end date in month, day, and year (mm/dd/yyyy).

Table C2. Determine Baseline Amount

16. **Baseline Amount:** The lower amount from the total row in Table C1. This will be from the baseline emissions column or the authorized limit column.

17. **Basis:** The type of emissions that were used to determine a baseline amount. If the lower amount in Table C1 was based on emissions reported in the annual emissions inventory, indicate "Baseline Emissions." If the lower amount in Table C1 were based on authorized emissions, indicate "Authorized Limit." All major stationary sources in the group listed in Table C1 must use the same basis.

Section D: Certifications

18. **VOC Baseline Amount Signature:** This should only be signed by the legally responsible person for the RE(s). If the baseline amount represents an aggregation of more than one major stationary source, the form should be signed by a responsible person who represents all of the REs on the form. The responsible party is certifying that the information presented on the Section 185 Baseline Amount form is true and accurate.

Note: The responsible person cannot be a consultant. For the definition of legally responsible party, please consult §122.165, Certification by a Responsible Official.

Attachment 1: Authorizations

For each RN listed on this form, list all permit authorizations (include permits-by-rule and standard operating permits).

Section 185 NO_X Baseline Amount Request Form

Section A: Customer Information

1. **Customer Reference Number (CN):** The number assigned by the TCEQ to an individual or business that is responsible for one or more regulated entities. For example, the organization or individual that owns or operates a site or facility. This CN identifies the customer for either the major stationary source or the group of major stationary sources that will be aggregated under a baseline amount.

2. **Customer Name:** Name of the owner or operator responsible for submitting the Section 185 fee program information.

Section B: Section 185 Contact Information

Note: This information must be associated with a RE and cannot belong to a consulting firm, law office, etc.

3. **First Name:** The first name of the company employee who will serve as the contact for items related to the Section185 fee program.

4. **Last Name:** The last name of the company employee who will serve as the contact for items related to the Section185 fee program.

5. **Title:** The job title of the Section 185 fee program contact.

6. **Mailing Address:** The address where correspondence related to the Section 185 fee program can be sent.

7. **Business Address:** The Section 185 contact's physical address if different from the mailing address.

8. **Telephone and Fax Numbers and Email Address:** Contact information for the Section 185 contact.

Note: Only one Section 185 contact person can be listed per form. If multiple REs are aggregated on a form, then the contact person listed will be considered the Section 185 contact for all REs in the Section 185 account.

Section C: Baseline Amount Worksheet

Table C1. Compare NO_X Emissions

List the RE for each major stationary source that will be aggregated into a group. If no aggregation is being requested, list only one RE. Include the following information for each major stationary source listed:

9. **Regulated Entity Reference Number (RN):** The number assigned by the TCEQ to a location where a TCEQ-regulated activity occurs. If an RN has not already been

assigned, complete a Core Data form and submit it to Central Registry. Submit a copy of this form with the Baseline Amount Determination Form.

10. **Site Name:** The name of the RE.

11. **SIC:** Standard Industrial Classification (SIC). Include the four-digit numeric code that best describes the RE's primary business activity and operations.

12. **Baseline Emissions:** The total annual and MSS emissions in tons per year as reported in the annual emissions inventory. Planned MSS are authorized and may have been reported as annual emissions in the emissions inventory. Do not include non-compliant emissions that occurred while the source was operating above an emissions limitation in this estimate.

    The baseline emissions are either annual emissions reported in the 2007 emissions inventory or if the source has intermittent, irregular, or cyclic operations or have emissions that vary significantly, a consecutive 24-month period between 2003 and 2007 for EGFs and between 1998 and 2007 for non-EGFs may be chosen. The baseline emissions must be adjusted downward to account for source-specific emissions limits in effect in the attainment year. In other words, if a unit's emissions during the 24-month period exceeded an emissions limit in effect in 2007, the source's baseline emissions must reflect compliance with that limit and be calculated in accordance with that limit.

    All emissions and REs reported within a form must use the same basis and period.

13. **Authorized Limit:** The sum of the annual limit at each major stationary source effective in the attainment year. All authorizations may be included, including limits from a permits-by-rule.

14. **Total:** The sum of all reported baseline emissions and the sum for the reported authorized limits.

15. **Period:** The period used for determining the baseline emissions. If the baseline year, 2007, is used, 2007 would be reported. If a historical 24-month time period is used, report the start date in month, day, and year (mm/dd/yyyy) and the end date in month, day, and year (mm/dd/yyyy).

Table C2. Determine Baseline Amount

16. **Baseline Amount:** The lower amount from the total row in Table C1. This will be from the baseline emissions column or the authorized limit column.

17. **Basis:** The type of emissions that were used to determine a baseline amount. If the lower amount in Table C1 were based on emissions reported in the annual emissions inventory, indicate "Baseline Emissions." If the lower amount in Table C1

were based on authorized emissions, indicate "Authorized Limit." All major stationary sources in the group listed in Table C1 must use the same basis.

Section D: Certifications

18. **NO_X Baseline Amount Signature:** This should only be signed by the legally responsible person for the RE(s). If the baseline amount represents an aggregation of more than one major stationary source, the form should be signed by a responsible person who represents all of the REs on the form. The responsible party is certifying that the information presented on the Section 185 Baseline Amount form is true and accurate. Note: The responsible person cannot be a consultant. For the definition of legally responsible party, please consult 30 TAC §122.165, Certification by a Responsible Official.

Attachment 1: Authorizations

For each RN listed on this form, list all permit authorizations (include permits by rule and standard operating permits).

Section 185 Baseline Amount Request Form for Aggregating VOC with NO_X

Section A: Customer Information

1. **Customer Reference Number (CN):** The number assigned by the TCEQ to an individual or business that is responsible for one or more regulated entities. For example, the organization or individual that owns or operates a site or facility. This CN identifies the customer for either the major stationary source or the group of major stationary sources that will be aggregated under a baseline amount.

2. **Customer Name:** Name of the owner or operator responsible for submitting the Section 185 fee program information.

Section B: Section 185 Contact Information

Note: This information must be associated with a RE and cannot belong to a consulting firm, law office, etc.

3. **First Name:** The first name of the company employee who will serve as the contact for items related to the Section185 fee program.

4. **Last Name:** The last name of the company employee who will serve as the contact for items related to the Section185 fee program.

5. **Title:** The job title of the Section 185 fee program contact.

6. **Mailing Address:** The address where correspondence related to the Section 185 fee program can be sent.

7. **Business Address:** The Section 185 contact's physical address if different from the mailing address.

8. **Telephone and Fax Numbers and Email Address:** Contact information for the Section 185 contact.

Note: Only one Section 185 contact person can be listed per form. If multiple REs are aggregated on a form, the contact person listed will be considered the Section 185 contact for all REs in the Section 185 account.

Section C: Baseline Amount Worksheet

Table C1. Compare NO_X Emissions

List the RE for each major stationary source that will be aggregated into a group. If no aggregation is being requested, list only one RE. Include the following information for each major stationary source listed:

9. **Regulated Entity Reference Number (RN):** The number assigned by the TCEQ to a location where a TCEQ-regulated activity occurs. If an RN has not already been assigned, complete a Core Data form and submit it to Central Registry. Submit a copy of this form with the Baseline Amount Determination Form.

10. **Site Name:** The name of the RE.

11. **SIC:** Standard Industrial Classification (SIC). Include the four-digit numeric code that best describes the RE's primary business activity and operations.

12. **Baseline Emissions:** The total annual and planned startup, shutdown, and maintenance (MSS) emissions in tons per year as reported in the annual emissions inventory. Planned MSS are authorized and may have been reported as annual emissions in the emissions inventory. Do not include non-compliant emissions that occurred while the source was operating above an emissions limitation in this estimate. List the baseline emissions for VOC and list the baseline emissions for NO_X for each RN. The form will subtotal each pollutant and then will supply a total for the combined VOC and NO_X baseline emissions.

    The baseline emissions are either annual emissions reported in the 2007 emissions inventory or if the source have intermittent, irregular, or cyclic operations or have emissions that vary significantly a consecutive 24-month period between 2003 and 2007 for EGFs and between 1998 and 2007 for non-EGFs may be chosen. The baseline emissions must be adjusted downward to account for emissions limits in effect in the attainment year. In other words, if a unit's emissions during the 24-month period exceeded an emissions limit in effect in 2007, the source's baseline emissions must reflect compliance with that limit and be calculated in accordance with that limit.

    All emissions and REs reported within a form must use the same basis and period.

13. **Authorized Limit:** The sum of the annual limit at each major stationary source effective in 2007. All authorizations may be included, including limits from a permit-by-rule.

    List the authorized limit for VOC emissions and for NO_X emissions for each RN effective in 2007. The form will subtotal each pollutant and then will supply a total for the combined VOC and NO_X authorized limit.

14. **Total:** The sum of all reported baseline emissions and the sum for the reported authorized limits.

15. **Period:** The period used for determining the Baseline Emissions. If the baseline year, 2007 is used, 2007 would be reported. If a historical 24-month time period is

used report the start date in month, day, and year (mm/dd/yyyy) and the end date in month, day, and year (mm/dd/yyyy).

Table C2. Determine Baseline Amount

16. **Baseline Amount:** List the lower amount from the total row in Table C1. This will be from the baseline emissions column or the authorized limit column.

17. **Basis:** Indicates the type of emissions that were used to determine a baseline amount. If the lower amount in Table C1 was based on emissions reported in the annual emissions inventory, indicate "Baseline Emissions." If the lower amount in Table C1 were based on authorized emissions, indicate "Authorized Limit." All major stationary sources in the group listed in Table C1 must use the same basis.

Section D: Certifications

18. **Aggregated VOCNO_X Baseline Amount Signature:** This should only be signed by the legally responsible person for the RE(s). If the baseline amount represents an aggregation of more than one major stationary source, the form should be signed by a responsible person who represents all of the REs on the form. The responsible party is certifying that the information presented on the Section 185 Baseline Amount form is true and accurate. Note: The responsible person cannot be a consultant. For the definition of legally responsible party, please consult 30 TAC §122.165, Certification by a Responsible Official.

Attachment 1: Authorizations

For each RN listed on this form, list all permit authorizations (include permits by rule and standard operating permits).

Mailing Instructions

Mail both the signed forms and the CD with the electronically completed baseline forms:

Section 185 Baseline Amount, MC 166
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, Texas 78711-3087

Contact Us

E-mail: 185Rule@tceq.texas.gov
EI helpline: 512-239-1773
Kathy Pendleton: 512-239-1936 or at kathy.pendleton@tceq.texas.gov

Examples of Completed Forms

Example 1: One Site Determining a Baseline Amount for VOC

One major stationary source is submitting a baseline amount for VOC. The single RN is listed in Table C1. In this example the authorized limits are lower than the actual emissions for the chosen year. If this source is also major for NO_X, a separate NO_X baseline amount form must be submitted.

Texas Commission on Environmental Quality

Section 185 Volatile Organic Compound Baseline Amount Request Form

Use this form to request a volatile organic compound (VOC) baseline amount from one or more major stationary sources.

Section A: Customer Information			
Customer Number (CN):[1]	CN111111111	**Customer Name:**[2]	A PAINTING COMPANY

Section B: Section § 185 Contact Information					
First Name:[3]	JANE	**Last Name:**[4]	DOE	**Title:**[5]	ENV ENGINEER

Business Address[6]	333 ANY STREET			**Mailing Address**[7]	333 ANY STREET		
City:	OLD TOWN			City:	OLD TOWN		
State:	TX	Zip Code:	12345 + 4:	State:	TX	Zip Code:	12345 + 4:

Telephone Numbers and E-Mail Address[8]			
Business:	(000) 123-4567	Ext:	
Alternate Business:		Ext:	
Fax:	(000) 102-3456	E-Mail Address:	JDOE@APAINTING.COM

DRAFT

Section C: VOC Baseline Amount Worksheet

List all the RNs in the proposed Section 185 Account Group. List the VOC baseline emissions and authorized VOC limits for each RN. The period used for the baseline emissions must be the same for each RN. List only one RN if no baseline aggregation is being requested for VOC at a single major stationary source.

Table C.1: Compare VOC Emissions (tons)

RN[9]	Site Name[10]	SIC[11]	Baseline Emissions (EI-Reported*)[12]	Authorized Limit in 2007[13]
RN111111111	PAINTING COMPANY SITE	9999	75	68
		Total[14]	75	68

*Include annual and planned maintenance, startup, and shutdown emissions from emissions inventory. Do not include non-compliant emissions. Adjust the baseline emissions downward to account for emissions limit in place on November 15, 2007.

Period (Indicate):[15] The period used for the baseline emissions for the major stationary source(s).

◉ 2007 Or ○ 24 Month Period Start Date: _____ End Date: _____

DRAFT

Table C.2: Determine VOC Baseline Amount	
From Table C.1, Select the lower of Baseline Emissions Total or Authorized Limit Total	
VOC Baseline Amount Total (Tons)[16]	**Basis (Select One)**[17]
68	Baseline Emissions

Certification

VOC Baseline Amount[18]

I do hereby certify the information reported on this form is true and accurately represents authorizations and baseline emissions for each RN listed.

Signature:	Jane Doe	Date:	Oct. 1, 2013

Attachment 1: Authorizations

List all permit authorizations (including Permits by Rule and Standard Operating Permits) at each major stationary source in the requested group that cover VOC and NO_X air emissions.

RN:111111111	Site Name: Painting Site		
4326			
RN:	Site Name:		
RN:	Site Name:		
RN:	Site Name:		
RN:	Site Name:		
RN:	Site Name:		

Example 2: Two Sites Aggregating Baseline Amounts for NO_X

Two major stationary sources are being aggregated for a single baseline amount for NO_X. Both RNs are listed in Table C1. Both RNs use the same 24-month period for the baseline emissions. The total amounts for the baseline emissions are compared to the total amounts of the authorized emissions to determine the lower of the two amounts. In this example, the baseline emissions are lower.

Texas Commission on Environmental Quality

Section 185 Nitrogen Oxides Baseline Amount Determination Form for a Single Major Stationary Source or Group of Major Stationary Sources

This group will aggregate the nitrogen oxide (NO_X) baseline amount from one or more major stationary sources. All subsequent §185 fees are due based on actual NO_X emissions from all the major stationary sources listed for this group.

Section 185 Account Number (to be assigned by TCEQ):					
Section A: Customer Information					
Customer Number (CN):	CN123456789	**Customer Name:**	Industrial Complex		
Section B: Section § 185 Contact Information					
First Name:	IMA	**Last Name:**	STAFF	**Title:**	Environmental Engineer
Business Address	123 Main STreet			**Mailing Address**	123 Main Street Street
City:	Outa Town			City:	Outa Town
State: TX	Zip Code: 12348	+ 4:		State: TX	Zip Code: 12348 + 4:
Telephone Numbers and E-Mail Address					
Business:	(713) 123-4512			Ext:	
Alternate Business:				Ext:	
Fax:	(713) 123-4811			E-Mail Address:	IMA@INDUSTRIAL COMPLEX.COM

Section C: NO_X Baseline Amount Worksheet

List all the RNs in the proposed Section 185 Account Group. List the NO_X baseline emissions and authorized NO_X limits for each RN. The period used for the baseline emissions must be the same for each RN. List only one RN if no baseline aggregation is being requested for NO_X at a single major stationary source.

Table C.1: Compare NO_X Emissions (tons)

RN[9]	Site Name[10]	SIC[11]	Baseline Emissions (EI-Reported*)[12]	Authorized Limit in 2007[13]
RN123456789	WIDGET PLANT 1	9999	150	175
RN234567890	WIDGET PLANT 2	9999	50	65
		Total[14]	200	240

DRAFT

*Include annual and planned maintenance, startup, and shutdown emissions from emissions inventory. Do not include non-compliant emissions. Adjust the baseline emissions downward to account for emissions limit in place on November 15, 2007.

Period (Indicate):[15] The Period used for the baseline emissions for the major stationary source(s).

○ 2007 Or ◉ 24 Month Period Start Date: 01/01/2004 End Date: 12/31/2005

Table C.2: Determine NO_X Baseline Amount	
From Table C.1, Select the lower of Baseline Emissions Total or Authorized Limit Total	
NO_X Baseline Amount Total (Tons)[16]	**Basis (Select One)**[17]
200	Baseline Emissions
Certification NO_X Baseline Amount[18] I do hereby certify the information reported on this form is true and accurately represents authorizations and baseline emissions for each RN listed.	
Signature: *John Smith*	Date: *9/30/2013*

Attachment 1: Authorizations

List all permit authorizations (including Permits by Rule and Standard Operating Permits) at each major stationary source in the requested group that cover VOC and NO_X air emissions.

RN:123456789	Site Name: Widget 1		
4900			
RN:234567890	Site Name:Widget 2		
5656			
RN:	Site Name:		
RN:	Site Name:		
RN:	Site Name:		
RN:	Site Name:		

Example 3: Three Sites Aggregating VOC and NO_X Baseline Amounts

In this example, three sites are combined in a group to aggregate the VOC and NO_X baseline amount. No other baseline forms are required for these sources. All RNs use the same 24-month period for the baseline emissions. The total of the authorized amount and baseline emissions amounts are compared to determine the lower of the two emissions. In this example, the baseline emissions are lower.

Texas Commission on Environmental Quality

Section 185 Baseline Amount Request Form for Aggregating Volatile Organic Compounds with Nitrogen Oxides

Use this form to request an aggregated volatile organic compound (VOC) and nitrogen oxides (NO_X) baseline amount from one or more major stationary sources.

DRAFT

Section A: Customer Information									
Customer Number (CN):[1]	CN987654321	**Customer Name:**[2]	EXCELLENT CHEMICALS						
Section B: Section § 185 Contact Information									
First Name:[3]	JOE	**Last Name:**[4]	JONES	**Title:**[5]	STAFF CONTACT				
Business Address[6]	1 HWY 1			**Mailing Address**[7]	1 HWY 1				
City:	ANY			City:	ANY				
State:	TX	Zip Code:	23456	+ 4:	1234	State:	TX	Zip Code:	23456	+ 4:	1234
Telephone Numbers and E-Mail Address[8]									
Business:	(888) 789-4567			Ext:	22222				
Alternate Business:	(888) 789-2369			Ext:	1234				
Fax:	(888) 789-4563	E-Mail Address: JOE@EXCELLENT.COM							

Section C: Baseline Amount Worksheet

List all the RNs in the proposed Section 185 Account Group. List the VOC baseline emissions and authorized VOC limits for each RN. The period used for the baseline emissions must be the same for each RN. List only one RN if no baseline aggregation is being requested for VOC at a single major stationary source.

Table C.1: Compare Emissions (tons)

RN[9]	Site Name[10]	SIC[11]	Baseline Emissions (El-Reported*) [12]		Authorized Limit in 2007 [13]	
			VOC	NO_X	VOC	NO_X
RN000000001	PLANT A	9999	368	1,458	367	1,800
RN000000002	PLANT B	1234	1,300	1,500	1,458	2,136
RN000000003	PLANT C	1234	123	14	150	15
		Subtotal	1,791	2,972	1,975	3,951
Sum the VOC with the NO_X baseline emissions subtotals to determine the baseline emissions total. Sum the VOC with the NO_X authorized subtotals to determine the allowable limit total.		**Total**[14]	4,763		5,926	

*Include annual and planned maintenance, startup, and shutdown emissions from emissions inventory. Do not include non-compliant emissions. Adjust the baseline emissions downward to account for emissions limit in place on November 15, 2007.

Period (Indicate):[15] The Period used for the baseline emissions for the major stationary source(s).

○ 2007 Or ◉ 24 Month Period Start Date: 12/01/2002 End Date: 11/31/2004

DRAFT

Table C.2: Determine VOC and NO_X Baseline Amount	
From Table C.1, Select the lower of Baseline Emissions Total or Authorized Limit Total	
VOC with NO_X Baseline Amount Total (Tons)[16]	**Basis (Select One)[17]**
4,763	Baseline Emissions
Certification VOC with NO_X Baseline Amount[18]	
I do hereby certify the information reported on this form is true and accurately represents authorizations and baseline emissions for each RN listed.	
Signature: *A Adams*	Date: *9/29/13*

Attachment 1: Authorizations

List all permit authorizations (including Permits by Rule and Standard Operating Permits) at each major stationary source in the requested group that cover VOC and NO_X air emissions.

RN:0000000019	Site Name: Plant A		
126	4522		
RN000000002	Site Name: Plant B		
1284	3881	1666	141414
RN:000000003	Site Name:Plant C		
39912			
RN:	Site Name:		
RN:	Site Name:		
RN:	Site Name:		