



# **How to Submit Emissions Inventory Revisions**

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## **Houston-Galveston-Brazoria (HGB)**

**2008 Eight-Hour Ozone  
Nonattainment Area**



# Overview

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- State implementation plan (SIP) emissions
- What is a revision?
  - Revisions are time sensitive.
- What will be processed at this time?
- How do I print my emissions inventory questionnaire (EIQ) to revise it?
- How do I make corrections?
- What else is required to be submitted with the revised EIQ pages?
- When are these revisions due?
- Where do I mail the revisions?



# SIP Emissions

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- Sources must have SIP emissions to be eligible to generate emission credits.
  - SIP emissions are the emissions inventory (EI) data from the year used in the projection-base year modeling inventory in the most recent attainment demonstration (AD) SIP revision.
- The TCEQ is preparing an HGB AD SIP revision that is expected to change the SIP emissions for future credit generation to:
  - the state's 2015 EI data for electric generating units (EGUs) with emissions recorded in the Environmental Protection Agency's 2015 Air Markets Program Data; and
  - the state's 2014 EI data for all other stationary point sources (non-EGUs).



# What is a revision?

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- A revision must address emissions reporting errors in a previously submitted self-reported EI.
- All revision requests are subject to Texas Commission on Environmental Quality (TCEQ) review and approval.
- **The revisions are time sensitive:**
  - Submit by **August 1, 2016**, and
  - Ensure all necessary pages and documentation are included.



# What is a revision? (cont.)

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To be eligible to be included in the HGB AD SIP projection-base year inventory (and thus be available for credit generation), the EI revision must:

- Be submitted on paper EIQ pages;
- Be submitted by **August 1, 2016**;
- Include a signed and detailed cover page explaining the reason for revisions;
- Include supporting documentation and sample calculations for the revised emissions;
- Include updated criteria emissions totals for the site; and
- Follow the guidance outlined in the *2015 Emissions Inventory Guidelines*, Chapter 7- EI Revisions.



# What will be processed at this time?

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- This is not an additional opportunity to comply with EI reporting. Inventories not received by the original deadline are subject to enforcement.
- Due to deadlines associated with preparing this AD SIP revision, delinquent initial emissions inventories may not be processed at this time.
- Inventories for HGB sites that do not meet the reporting requirements of 30 TAC Section 101.10 may not be processed at this time.



# How do I print my EIQ?

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- The revisions must be submitted on paper EIQ pages.
  - Revisions can NOT be submitted through Web reporting.
- To print the EIQ, follow the detailed instructions and screen shots located at:  
<http://www.tceq.texas.gov/assets/public/implementation/air/ie/pseiforms/eiq-print-copy.pdf>
- By following these instructions, a PDF copy of your EIQ should be emailed to you.



# How do I make emissions corrections?

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- Print the PDF EIQ that was e-mailed to you from the TCEQ Central Registry query Web site (see previous slide for instructions).
- EIQs must be printed one-sided.
- Update criteria emissions totals for the site found on page three of the EIQ.
  - These amounts are not data-entered but will help identify possible entry or summation errors.
- Update emissions on the specific path of the EIQ.
- Submit only EIQ pages that are being revised.



# How do I make emissions corrections? (cont.)

## Site-Wide Criteria Emissions Totals

Originally submitted

2014 TCEQ Emissions Inventory Questionnaire  
March 17, 2014

Page: 3

ACCOUNT INFORMATION

RN:RN11111111 Account:DF0000X  
Company: XYZ Industries

Revised

EIQ Year: 2014

Last EI Date:12/31/2012

CRITERIA EMISSIONS TOTALS

| Class | Annual (TPY)/Current                  | Ozone (PPD)/Current | SMSS (TPY)/Current | EE (TPY)/Current | EE/SMSS(TPY) |
|-------|---------------------------------------|---------------------|--------------------|------------------|--------------|
| PM10  | 249.1181/_____                        | 1504.4308/_____     | 0.0000/_____       | 0.0000/_____     | 0.0000       |
| PB    | 0.0315/_____                          | 0.1995/_____        | 0.0000/_____       | 0.0000/_____     | 0.0000       |
| SO2   | 571.8000/_____                        | 3508.2353/_____     | 0.0000/_____       | 0.0136/_____     | 0.0136       |
| NOX   | <del>1097.7000</del> <b>1100.5689</b> | 901.5686/_____      | 0.0000/_____       | 0.0000/_____     | 0.0000       |
| CO    | 468.4000/_____                        | 3090.0654/_____     | 0.0000/_____       | 0.0000/_____     | 0.0000       |
| VOC   | <del>14.4231</del> <b>17.8965</b>     | 85.2912/_____       | 0.0000/_____       | 0.0000/_____     | 0.0000       |
| PM2.5 | 121.7060/_____                        | 669.0721/_____      | 0.0000/_____       | 0.0000/_____     | 0.0000       |

SITE QUANTIFIABLE EVENT TOTALS

Note:  
Report TOTAL NUMBER of each event type for the reported EIQ Year per 30 TAC Sections 101.201 and 101.211.

Reportable Emission Events: \_\_\_\_\_0\_\_\_\_\_

Non-Reportable Emission Events: \_\_\_\_\_1\_\_\_\_\_

Reportable Scheduled Maintenance, Startup, or Shutdown Activities: \_\_\_\_\_0\_\_\_\_\_

Non-Reportable Scheduled Maintenance, Startup, or Shutdown Activities: \_\_\_\_\_0\_\_\_\_\_

Excess Opacity Events: \_\_\_\_\_0\_\_\_\_\_



# How do I make emissions corrections? (cont.)

## Path Level Emissions Revisions

Page: 569

RN:RN111111111 Account:DF0000E  
Company: XYZ Industries

EQ Year: 2014

FIN:COMBUSTION EPN: STACK1  
Comment:

Originally submitted

Revised

EMISSIONS INFORMATION

| Code  | Cas #   | Contaminant      | Method | Annual (TPY)                         | Ozone (PPD)                           | SMSS (TPY) | EE (TPY) | EE/SMSS |
|-------|---------|------------------|--------|--------------------------------------|---------------------------------------|------------|----------|---------|
| 50001 | 0       | VOC-UNCLASSIFIED | M A    | <del>3.5712</del><br><b>6.0345</b>   | <del>19.4860</del><br><b>32.5863</b>  | 0.0000     | 0.0000   | 0.0000  |
| 70400 | 0       | NITROGEN OXIDES  | M A    | <del>15.1097</del><br><b>32.6452</b> | <del>81.5924</del><br><b>172.2564</b> | 0.0000     | 0.0000   | 0.0000  |
| 70510 | 7446095 | SULFUR DIOXIDE   | B      | 0.5710                               | 3.5082                                | 0.0000     | 0.0000   | 0.0000  |
| 90300 | 630080  | CARBON MONOXIDE  | A      | 10.4000                              | 56.3090                               | 0.0000     | 0.0000   | 0.0000  |



# What else is required to be submitted with the revised EI Q?

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- A signed and detailed cover letter describing the revisions being made and the reason for the revisions.
- Detailed sample calculations and supporting documentation for the revised emissions.
  - Must be provided for each path that is being revised.
- Missing or inadequate sample calculations or supporting documentation could result in processing delays that would prevent the revisions from being incorporated into the HGB AD SIP revision.



# When are these revisions due?

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- EIQ revisions must be submitted by **August 1, 2016** to ensure any necessary revisions are accounted for in the HGB AD SIP revision.
- If the TCEQ accepts the submitted revision, the SIP emissions for credit generation projects will be based on the revision.
- Inventory revisions submitted after August 1, 2016, will still be processed, but the SIP emissions for credit generation projects may not reflect the change.



# Where do I mail the revision?

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## **United States Postal Service**

2014/5 HGB Emissions Inventory Revisions, MC-166  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

## **Overnight Service**

2014/5 HGB Emissions Inventory Revisions, MC-166  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Bldg. E, Third Floor  
Austin, Texas 78753



# Additional Resources and Contact Information

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- *2015 Emissions Inventory Guidelines*, Chapter 7-EI Revisions

[http://www.tceq.state.tx.us/assets/public/comm\\_exec/pubs/rg/rg360/rg36013/chapter7.pdf](http://www.tceq.state.tx.us/assets/public/comm_exec/pubs/rg/rg360/rg36013/chapter7.pdf)

- How to print a copy of your EIQ

<http://www.tceq.texas.gov/assets/public/implementation/air/ie/pseiforms/eiq-print-copy.pdf>

- Central Registry query page

<http://www12.tceq.state.tx.us/crpub/>

- Danielle Nesvacil

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