

CHAPTER 5—EXAMPLE INITIAL EMISSIONS INVENTORY

This chapter presents an example of an initial EI for a hypothetical site producing and processing natural gas. Carefully consult the materials in Chapters 3 and 4 in conjunction with this example.

Identifying Emission Sources

The following processes occur at an upstream gas field site (hypothetical):

- natural gas production
- separation of natural gas and liquids
- natural gas sweetening
- natural gas dehydration
- natural gas compression and delivery to a pipeline
- storage of condensate and natural gas liquids
- loading of condensate on trucks
- blowdown operations

The following equipment is involved in the above processes:

- lift pump and associated electric motor
- gunbarrel separator (initial gas-liquids separation)
- amine unit, associated heater, and diethylamine storage tank
- glycol dehydration still, associated heater, and ethylene glycol storage tank
- emergency flare to control glycol unit and amine unit emission events, as well as blowdowns
- refrigerated absorption unit and fractionation columns (further gas-liquids separation)
- compressor engines:
 - one 2000 hp turbine with dual exhaust stacks
 - one 1200 hp lean-burn, 4-stroke engine
 - one 1000 hp rich-burn, 4-stroke engine with a 70 percent-efficient nonselective catalytic reduction (NSCR) system
- two 1500 gal condensate fixed-roof storage tanks
- one condensate truck loading rack (uncontrolled)
- high-pressure storage tanks

Analyzing the two above lists, the following emission sources can be identified. Characteristic source emissions are listed, as appropriate.

Table 5-1. Identifying Emission Sources from Equipment and Processes

Equipment or Process	Emissions Source
Lift pump and associated electric motor	Piping fugitive components (including pump)
Gunbarrel separator	Gunbarrel separator: flash emissions
	Piping fugitive components
Natural gas sweetening	Amine unit: hydrogen sulfide emissions
	Amine heater unit: combustion emissions
	Diethylamine storage tank
	Piping fugitive components
Natural gas dehydration	Glycol still: VOC and HAP emissions
	Glycol heater unit: combustion emissions
	Glycol-still flash tank: VOC and HAP emissions
	Ethylene glycol storage tank
	Piping fugitive components
Refrigerated absorption unit and fractionation columns	Piping fugitive components
Compressor engines	Turbine
	Lean-burn four-stroke engine
	Rich-burn four-stroke engine
	Piping fugitive components
Flaring of emissions events	Emergency flare: combustion emissions
	Source that generated emissions events (amine unit, blowdown, etc.)
	Piping fugitive components

Table 5-1. Identifying Emission Sources, continued

Equipment or Process	Emission Source
Condensate storage	First 1500 gal condensate fixed-roof storage tank
	Second 1500 gal condensate fixed-roof storage tank
	Piping fugitive components
Condensate truck loading	Loading rack: loading emissions
	Piping fugitive components
Natural gas liquids storage	Piping fugitive components, especially relief valves
Gas delivery to pipeline	Piping fugitive components
Blowdown operations	Blowdown process

Representing Emission Sources in the Emissions Inventory

Sources (Facilities). After the emission sources have been identified, they must be added to the inventory using Web-EI reporting or standardized EI forms. The preferred method for submitting an EI is through the STEERS-AEIR Web-EI system, using either the interactive Web entry or text-file upload. Review Chapter 3, “Emissions Inventory Structure,” in conjunction with this chapter.

For an EI, a *facility* is defined as a unique unit, device, structure, or area capable of generating emissions. The sources listed in Table 5-1 are all of the emission sources at the site. Each source that will be reported in the EI must be assigned a unique facility identification number (FIN) by the owner or operator. The EI naming conventions (for facilities as well as emission points) must follow the naming conventions of any associated permits. A list of FINs (and their corresponding emission sources) for the hypothetical site appears in Table 5-2.

Table 5-2. Assigning FINs to Emission Sources

Emission source	FIN
All natural gas piping fugitive components	FUGAREA1
All condensate piping fugitive components	CONDFUGS
Gunbarrel separator	GUNBARSEP
Amine unit	AMINEUNIT
Amine heater unit	AMHEATER
Diethylamine storage tank	DEA-TANK
Glycol still	GLYCOLSTIL
Glycol heater unit	GLHEATER
Ethylene glycol storage tank	EG-TANK
Turbine	TURBINE1
Lean-burn four-stroke engine	COMP1
Rich-burn four-stroke engine	COMP2
Emergency flare	UPSETFLARE
First 1500 gal condensate fixed-roof storage tank	CONDTANK1
Second 1500 gal condensate fixed-roof storage tank	CONDTANK2
Loading rack: loading emissions	LOADRACK
Blowdown operations	BLOWDOWN

Note that, in Table 5-2, piping fugitive components are grouped together into two facilities: one equipment leak fugitive facility for the natural gas streams, and one equipment leak fugitive facility for the condensate streams. If an emission source handles similar process streams, uses the same emissions determination methodology, and is monitored under the same monitoring program, all of the components will be grouped under one facility. See Technical Supplement 3 in Appendix A for more details on creating facilities for piping component fugitive areas.

Emission points. Once all of the FINs have been assigned for the emission sources, their associated emission points must be identified. From Tables 5-1 and 5-2, most of the sources' emission points can be identified. However, **all possible** emission points for a facility have to be listed. Based on this information, Table 5-3 lists all of the possible emission points identified for the sources listed in Table 5-2.

Table 5-3. Identifying Emission Points for FINs

FIN	Emission Point(s)
FUGAREA1	Fugitive area encompassing piping component fugitives in natural gas service
CONDFUGS	Fugitive area encompassing piping component fugitives in condensate service
GUNBARSEP	Separator vent
AMINEUNIT	Amine unit vent
	Flare (during emissions events)
AMHEATER	Heater stack
DEA-TANK	Tank vent
GLYCOLSTIL	Glycol still vent
	Flare (during emissions events)
GLHEATER	Heater stack
EG-TANK	Tank vent
TURBINE1	Stack one (dual exhaust stack)
	Stack two (dual exhaust stack)
COMP1	Compressor stack
COMP2	Compressor stack
UPSETFLARE	Flare
CONDTANK1	Tank vent
CONDTANK2	Tank vent
LOADRACK	Area where fugitive loading emissions escape
BLOWDOWN	Emergency flare

In Table 5-3, all facilities that are able to route their emissions from emissions events have the flare as an emission point. Each emission point must be assigned a unique emission point number. The EI naming conventions for EPNs must follow the same naming conventions as their air permit. Table 5-4 lists the FINs and their corresponding EPNs.

Table 5-4. Assigning EPNs to Emission Points

FIN	Emission point	EPN
FUGAREA1	Fugitive area encompassing piping component fugitives	FUGAREA1
CONDFUGS	Fugitive area encompassing piping component fugitives	CONDFUGS
GUNBARSEP	Separator vent	SEPVENT
AMINEUNIT	Amine unit vent	AMINEVENT
AMINEUNIT	Flare (during emissions events)	FLARE
AMHEATER	Heater stack	HEATERSTK1
DEA-TANK	Tank vent	DEA-TANK
GLYCOLSTIL	Glycol still vent	GLYCOLVENT
	Flare (during emissions events)	FLARE
GLHEATER	Heater stack	HEATERSTK2
EG-TANK	Tank vent	EG-TANK
TURBINE1	Stack one (dual exhaust stack)	TURBSTK1
	Stack two (dual exhaust stack)	TURBSTK2
COMP1	Compressor stack	COMP1STK
COMP2	Compressor stack	COMP2STK
UPSETFLARE	Flare	FLARE
CONDTANK1	Tank vent	CONDTANK1
CONDTANK2	Tank vent	CONDTANK2
LOADRACK	Fugitive loading emissions area	LOADFUGS
BLOWDOWN	Emergency flare	FLARE

Control Devices. Before adding the emissions paths to the EI, the control devices must be added to the appropriate paths. From the information in Table 5-4, control devices must be added to the following FIN/EPN paths:

- AMINEUNIT / FLARE

- GLYCOLUNIT / FLARE
- COMP2 / COMP2 (remember, this engine has NSCR controls)
- BLOWDOWN / FLARE

Each control device must be assigned a unique control identification number. Table 5-5 lists the FINs, the EPNs, and their associated CINs.

Table 5-5. Assigning CINs to Paths

FIN	EPN	CIN (if applicable)
FUGAREA1	FUGAREA1	
CONDFUGS	CONDFUGS	
GUNBARSEP	SEPVENT	
AMINEUNIT	AMINEVENT	
AMINEUNIT	FLARE	FLARE
AMHEATER	HEATERSTK1	
DEA-TANK	DEA-TANK	
GLYCOLSTIL	GLYCOLVENT	
GLYCOLSTIL	FLARE	FLARE
GLHEATER	HEATERSTK2	
EG-TANK	EG-TANK	
TURBINE1	TURBSTK1	
TURBINE1	TURBSTK2	
COMP1	COMP1STK	
COMP2	COMP2STK	NSCR
UPSETFLARE	FLARE	
CONDTANK1	CONDTANK1	
CONDTANK2	CONDTANK2	
LOADRACK	LOADFUGS	
BLOWDOWN	FLARE	FLARE

Creating EI Structure. Emission paths can now be created using the online STEERS-AEIR Web-EI system or by submitting the appropriate Facility Information, Emission Point Information, and Abatement Device Information hard-copy (paper) forms. For more information on how to

submit online, please see <<https://www3.tceq.texas.gov/steers/>>. Forms are available on the EAS Web page at <www.tceq.texas.gov/goto/ieas>.

Facility information, through online reporting or paper forms, is required for different types of processes or units:

- cleaning
- coating or printing
- cooling tower
- flare (combustion unit—flare profile)
- leaking component fugitives
- loading
- non-flare combustion unit
- storage tank
- VOC process
- wastewater system
- wastewater system component
- other facility

The agency requires information on different types of emission points, either through online reporting or via paper forms:

- flare
- fugitive
- stack

Abatement device information, through online reporting or paper forms, is required for control devices.

For this hypothetical site, Table 5-6 lists the information required to add its structure to the EI. If submitting using the STEERS-AEIR Web-EI system, supply the appropriate information online. If submitting using paper forms, complete the standardized forms and mail them to the EAS.

For a facility that has multiple emission points, only **one** Facility Information form must be submitted to add the facility. To link the facility to other emission points, enter the FIN in the appropriate blank on the Path Emissions form. These procedures can also be used for emission points and abatement devices that have multiple paths. Similar procedures also apply when reporting EI structure using the online STEERS-AEIR Web-EI system. For a facility that has multiple emission points, only **one** facility must be added. To link the facility to other emission points, add a path for each link. Similar procedures can be used for adding emission points and abatement devices that have multiple paths.

Table 5-6. Appropriate Information for Adding Structure to the EI

FIN and Appropriate Facility Form	EPN and Appropriate Emission Point Form	CIN
FUGAREA1: Facility Information form for Leaking Component Fugitives	FUGAREA1: Emission point form for a Fugitive-type EPN	
CONDFUGS: Facility Information form for Leaking Component Fugitives	CONDFUGS: Emission point form for a Fugitive-type EPN	
GUNBARSEP: Facility Information form for a VOC Process (under the “Profile” section of the form, check “other”).	SEPVENT: Emission point form for a Stack-type EPN	
AMINEUNIT: Facility Information form for Other Facility	AMINEVENT: Emission point form for a Stack-type EPN	
AMINEUNIT: Facility Information form for Other Facility	FLARE: Emission point form for a Flare-type EPN	FLARE*
AMHEATER: Facility Information form for a Combustion Unit	HEATERSTK1: Emission point form for a Stack-type EPN	
DEA-TANK: Facility Information form for a Storage Tank	DEA-TANK: Emission point form for a Stack-type EPN	
GLYCOLSTIL: Facility Information form for a VOC Process (under the “Profile” section of the form, check “glycol still”)	GLYCOLVENT: Emission point form for a Stack-type EPN	
GLYCOLSTIL: Facility Information form for a VOC Process (under the “Profile” section of the form, check “glycol still”)	FLARE: Emission point form for a Flare-type EPN	FLARE*
GLHEATER: Facility Information form for a Combustion Unit	HEATERSTK2: Emission point form for a Stack-type EPN	
EG-TANK: Facility Information form for a Storage Tank	EG-TANK: Emission point form for a Stack-type EPN	
TURBINE1: Facility Information form for a Combustion Unit (under the “Profile” section of the form, check “turbine”)	TURBSTK1: Emission point form for a Stack-type EPN	
TURBINE1: Facility Information form for a Combustion Unit (under the “Profile” section of the form, check “turbine”)	TURBSTK2: Emission point form for a Stack-type EPN	

* Since only one abatement device form exists for control devices, complete the Abatement Device Information form for these two CINs.

(continued)

Table 5-6. Appropriate Information for Adding Structure to the EI, continued

FIN and Appropriate Facility Form	EPN and Appropriate Emission Point Form	CIN
COMP2: Facility Information form for a Combustion Unit (under the “Profile” section of the form, check “IC Engine,” and complete the remaining blanks “4-cycle, rich-burn”)	COMP2STK: Emission point form for a Stack-type EPN	NSCR*
UPSETFLARE: Facility Information form for a Flare (Combustion Unit—Flare Profile)	FLARE: Emission point form for a Flare-type EPN	
CONDTANK1: Facility Information form for a Storage Tank	CONDTANK1: Emission point form for a Stack-type EPN	
CONDTANK2: Facility Information form for a Storage Tank	CONDTANK2: Emission point form for a Stack-type EPN	
LOADRACK: Facility Information form for a Loading facility	LOADFUGS: Emission point form for a Fugitive-type EPN	
BLOWDOWN: Facility Information form for a VOC Process (under the “Profile” section of the form, check “blowdown operations”)	FLARE: Emission point form for a Flare-type EPN	FLARE*

* Since only one abatement device form exists for control devices, complete the Abatement Device Information form for these two CINs.

Completing Path Information. Emissions data must be completed on a separate Path Emissions form for each path shown in Table 5-6. Submit Material Throughput forms as necessary to supply process rate data used in emissions determinations. Similar procedures apply when adding emissions to a path using the online STEERS-AEIR Web-EI system.

Refer to Appendix A for information on determining emissions from common emissions sources.

Completing Account Information. Account information and contact information are required through online reporting or paper forms.

Use the information in Table 5-6 to complete the Structural Overview form, which documents emission path data. Note: Since information is entered into STARS by path, when using paper forms, submit them in the following order for each path: FIN, EPN, CIN, and Path Emissions.

The sum of all criteria pollutants reported at all emission paths must be entered on the Account Emissions form for paper submissions. The legally responsible party must fill out and sign the section headed “Signature of Legally Responsible Party.” If no emissions from emissions events are being reported within the EI, the legally responsible party must sign the

Emissions Events certification. Similar procedures apply when certifying emissions online using the STEERS-AEIR Web-EI system.

Detailed instructions on how to complete each EI form are available on the EAS Web page at <www.tceq.texas.gov/goto/ieas>.

