

CHAPTER 1—GENERAL INFORMATION

Introduction

As part of national and state efforts to protect human health and the environment, federal and state laws require the State of Texas to develop an annual emissions inventory (EI) of the air pollutants emitted by companies at their sites.

The Texas Commission on Environmental Quality is authorized to request emissions inventories and supporting documentation under the provisions of:

- the federal Clean Air Act;
- the Texas Clean Air Act, Texas Health and Safety Code Section 382.014; and
- Title 30 of the Texas Administrative Code (30 TAC), Section 101.10—the EI requirements.

To meet the reporting requirements of these regulations, the regulated community will be working with the Emissions Assessment Section (EAS) of the TCEQ's Office of Air.

The TCEQ uses the emissions inventory to plan pollution control programs, promote compliance with laws and regulations, conduct permit reviews, develop airshed modeling and rulemaking activities, and supply required data to the U.S. Environmental Protection Agency (EPA).

EAS Objectives

In order to improve the overall quality of the statewide emissions inventory and to meet the goals stated above, the EAS objectives are to:

- ensure that the data requested in the emission inventory meet the requirements of the federal Clean Air Act and various other federal and state mandates;
- collect data in a standard format using the State of Texas Environmental Electronic Reporting System (STEERS)—Air Emissions Inventory Reporting (AEIR) Web-EI system, EAS forms, and the emissions inventory questionnaire (EIQ);
- ensure that companies consistently use the most current and accurate information available for determining their emissions;
- help industry accurately report emissions data, especially by offering assistance through the EAS Help Line (512-239-1773);
- maintain data in a standard format using the State of Texas Air Reporting System (STARS) database;
- supply data to other TCEQ personnel; and

- continually update TCEQ publications in order to improve communication with companies submitting emissions inventories.

What This Publication Contains

This chapter discusses 30 TAC Section 101.10 and what constitutes a complete EI submission. This information should help owners or operators of regulated entities determine whether an emissions inventory is required for a site and correctly prepare a complete emissions inventory submission by the due date. A brief discussion of the EAS's confidentiality policy is included in this chapter. The chapter concludes with a brief discussion of the two options available for submitting an EI through the STEERS-AEIR Web-EI System.

Chapter 2 explains the EI process and its key concepts to those unfamiliar with the emissions inventory.

Chapter 3 discusses correct EI structure (representing processes in the EI), gives examples for some common industrial processes, and supplies guidance for modifying existing representations.

Chapter 4 presents information about requested emissions data; using acceptable actual emissions determination methodologies; speciating emissions; and correctly reporting actual annual emissions, ozone season emissions, and emissions due to emissions events and scheduled maintenance, startup, and shutdown activities.

Chapter 5 offers an example of creating an initial EI.

Chapter 6 contains instructions for updating an EI.

Chapter 7 includes instructions on revising EI data, requesting EI data, and verifying site coordinate data.

The appendixes contain:

- technical supplements intended to help determine emissions from certain common sources;
- sample letters that may help address some common situations;
- EPA and TCEQ resources to assist in completing or updating an EI;
- information about qualifying for small-business assistance; and
- contacting the TCEQ Pollution Prevention and Education Section for pollution prevention tips.

Also included in this publication are a checklist to help determine if all necessary supporting documentation is included with the EI, a glossary, a list of abbreviations and information on contacting the EAS.

Note: Detailed EI reporting instructions are available for download at <www.tceq.texas.gov/goto/ieas>. Any EI tools referred to in this publication can be found on that Web page.

About 30 TAC Section 101.10

This section includes a discussion of the emissions inventory process as a self-reporting process, the special inventory request, a copy of 30 TAC Section 101.10, and maps and tables depicting the state's nonattainment and special inventory areas. The maps and tables are intended to clarify reporting requirements and do not supersede or replace requirements of federal or state law, including 30 TAC Section 101.10. It is the responsibility of the owner or operator of a regulated entity to read and understand all federal and state laws and regulations applicable to the regulated entity, including 30 TAC Section 101.10, the EI requirements.

A Self-Reporting Process

Note: Beginning with the 2015 reporting year, the TCEQ requires sites that meet the reporting requirements of 30 TAC Section 101.10 to submit emissions inventories through the STEERS-AEIR Web-EI System. Please contact the EAS immediately if you have concerns regarding the online reporting requirement.

The EI process requires self-reporting. The owner or operator of the regulated entity is responsible for determining whether 30 TAC Section 101.10 applies to the site. If so, or if the TCEQ requests a special inventory, the owner or operator must submit an EI by March 31 of the calendar year immediately after the reporting year or on the due date as directed in writing by the agency. Failure to do so may result in the agency initiating an enforcement action against the owner or operator. Responsibility for submitting the EI resides with the owner or operator of the site on March 31 of the calendar year immediately after the reporting year or on the due date as directed in writing by the agency.

Failure to receive a courtesy notification from the TCEQ regarding the required submission of the annual emissions inventory does not justify noncompliance with 30 TAC Section 101.10.

Requirements for submitting an EI may vary based on the site location and on the type and quantity of emissions released. This publication will help in determining whether the owner or operator must submit an emissions inventory and, if so, how to determine emissions and how to prepare and submit the required information.

The TCEQ requires annual and initial emissions inventories to be submitted online through its STEERS-AEIR Web-EI system, either by interactive Web entry or text-file upload. For more information on how to submit online, please see the EAS Web page at <www.tceq.texas.gov/goto/ieas>.

Nonattainment Designations

For the official list and boundaries of nonattainment areas, see Title 40, Code of Federal Regulations, Part 81 and pertinent *Federal Register* notices.

The map entitled “Emissions Inventory Reporting Requirements” on page 9 identifies the ozone nonattainment and ozone-precursor special inventory counties. A link to this map also appears on the EAS Web page at <www.tceq.texas.gov/goto/ieas>. The map and its associated table are intended as guidance and do not supersede or replace any state or federal law or regulation.

Special Inventory Request

The TCEQ, under the “special emissions inventory” provisions of 30 TAC Paragraph 101.10(b)(3), has the authority to request emissions inventories to be completed and submitted. If a regulated entity meets the thresholds explained below and the TCEQ has notified the regulated entity with a formal written request, the owner or operator must complete and submit an EI by the required date. The TCEQ is conducting a special emissions inventory for entities that emit or have the potential to emit lead and for entities that emit ozone precursors.

Requirements for Sources that Emit Lead

For the 2015 reporting year, the TCEQ is conducting a special inventory for sources of lead under the authority of 30 TAC Paragraph 101.10(b)(3). Any regulated entity that emits 0.5 tons per year, or has the potential to emit 5 tons per year of lead during normal operations must submit a complete emissions inventory by the required due date, regardless of location.

Requirements for Sources that Emit Ozone Precursors in Specified Counties

The TCEQ is conducting a special emissions inventory for sources that emit ozone precursors in the specified counties listed in Table 1-1 under the authority of 30 TAC Paragraph 101.10(b)(3). Regulated entities that are located in one of these counties and had actual emissions of either 10 tpy of volatile organic compounds or 25 tpy of nitrogen oxides during normal operations must submit a complete emissions inventory by the required due date.

Note: Regulated entities that meet any of the other applicability requirements of 30 TAC Section 101.10 are required to submit an annual emissions inventory regardless of whether the TCEQ has made a formal written request.

Table 1-1. Ozone-Precursor Special Inventory Counties

Bastrop	Bexar	Caldwell	Comal	El Paso
Gregg	Guadalupe	Hardin	Harrison	Hays
Henderson	Hood	Jefferson	McLennan	Nueces
Orange	Rusk	San Patricio	Smith	Travis
Upshur	Victoria	Williamson	Wilson	

30 TAC Section 101.10. Emissions Inventory Requirements

[A copy of 30 TAC Section 101.10 appears below for convenience. For the official rule, see <[texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=30&pt=1&ch=101&rl=10](http://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=30&pt=1&ch=101&rl=10)>.]

(a) **Applicability.** The owner or operator of an account or source in the State of Texas or on waters that extend 25 miles from the shoreline meeting one or more of the following conditions shall submit emissions inventories or related data as required in subsection (b) of this section to the commission on forms or other media approved by the commission:

- (1) an account which meets the definition of a major facility/stationary source, as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions);
- (2) any account in an ozone nonattainment area emitting a minimum of ten tons per year (tpy) volatile organic compounds (VOC), 25 tpy nitrogen oxides (NO_x), or 100 tpy or more of any other contaminant subject to national ambient air quality standards (NAAQS);
- (3) any account that emits or has the potential to emit 100 tpy or more of any contaminant except for [greenhouse gases], individually or collectively, as listed in §101.1 of this chapter (relating to Definitions);
- (4) any account which emits or has the potential to emit 10 tons of any single or 25 tons of aggregate hazardous air pollutants as defined in Federal Clean Air Act (FCAA), §112(a)(1); and
- (5) any minor industrial source, area source, non-road mobile source, or mobile source of emissions subject to special inventories under subsection (b)(3) of this section. For purposes of this section, the term “area source” means a group of similar activities that, taken collectively, produce a significant amount of air pollution.

(b) **Types of inventories.**

- (1) **Initial emissions inventory.** Accounts, as identified in subsection (a)(1), (2), (3), or (4) of this section, shall submit an initial emissions inventory (IEI) for any criteria pollutant or hazardous air pollutant (HAP) that has not been identified in a previous inventory. The IEI shall consist of actual emissions of VOC, NO_x, carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), particulate matter of less than 10 microns in diameter (PM₁₀), any other contaminant subject to NAAQS, emissions of all HAPs identified in FCAA, §112(b), or any other

contaminant requested by the commission from individual emission units within an account. For purposes of this section, the term “actual emission” is the actual rate of emissions of a pollutant from an emissions unit as it enters the atmosphere. The reporting year will be the calendar year or seasonal period as designated by the commission. Reported emission activities must include annual routine emissions; excess emissions occurring during maintenance activities, including start-ups and shutdowns; and emissions resulting from upset conditions. For the ozone nonattainment areas, the inventory shall also include typical weekday emissions that occur during the summer months. For CO nonattainment areas, the inventory shall also include typical weekday emissions that occur during the winter months. Emission calculations must follow methodologies as identified in subsection (c) of this section.

- (2) Statewide annual emissions inventory update (AEIU). Accounts meeting the applicability requirements during an inventory reporting period as identified in subsection (a)(1), (2), (3), or (4) of this section shall submit an AEIU which consists of actual emissions as identified in subsection (b)(1) of this section if any of the following criteria are met. If none of the following criteria are met, a letter certifying such shall be submitted instead:
- (A) any change in operating conditions, including start-ups, permanent shut-downs of individual units, or process changes at the account, that results in at least a 5.0% or 5 tpy, whichever is greater, increase or reduction in total annual emissions of VOC, NO_x, CO, SO₂, Pb, or PM₁₀ from the most recently submitted emissions data of the account; or
 - (B) a cessation of all production processes and termination of operations at the account.
- (3) Special inventories. Upon request by the executive director or a designated representative of the commission, any person owning or operating a source of air emissions which is or could be affected by any rule or regulation of the commission shall file emissions-related data with the commission as necessary to develop an inventory of emissions. Owners or operators submitting the requested data may make special procedural arrangements with the Emissions Assessment Section to submit data separate from routine emission inventory submissions or other arrangements as necessary to support claims of confidentiality.

(c) **Calculations.** Actual measurement with continuous emissions monitoring systems (CEMS) is the preferred method of calculating

emissions from a source. If CEMS data is not available, other means for determining actual emissions may be utilized in accordance with detailed instructions of the commission. Sample calculations representative of the processes in the account must be submitted with the inventory.

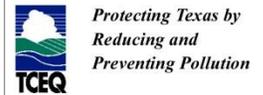
(d) **Certifying statement.** A certifying statement, required by the FCAA, §182(a)(3)(B), is to be signed by the owner(s) or operator(s) and shall accompany each emissions inventory to attest that the information contained in the inventory is true and accurate to the best knowledge of the certifying official.

(e) **Reporting requirements.** The IEI or subsequent AEIUs shall contain emissions data from the previous calendar year and shall be due on March 31 of each year or as directed by the commission. Owners or operators submitting emissions data may make special procedural arrangements with the Emissions Assessment Section to submit data separate from routine emission inventory submissions or other arrangements as necessary to support claims of confidentiality. Emissions-related data submitted under a special inventory request made under subsection (b)(3) of this section are due as detailed in the letter of request.

(f) **Enforcement.** Failure to submit emissions inventory data as required in this section shall result in formal enforcement action under Texas Water Code, Chapter 7.

April 17, 2014

Emissions Inventory Reporting Requirements



Texas Commission on Environmental Quality
 P.O. Box 13087 (Mail Code 197)
 Austin, Texas 78711-3087

December 3, 2012



Texas Statewide Mapping Projection (TSMS)

Scale: 1:6,623,570

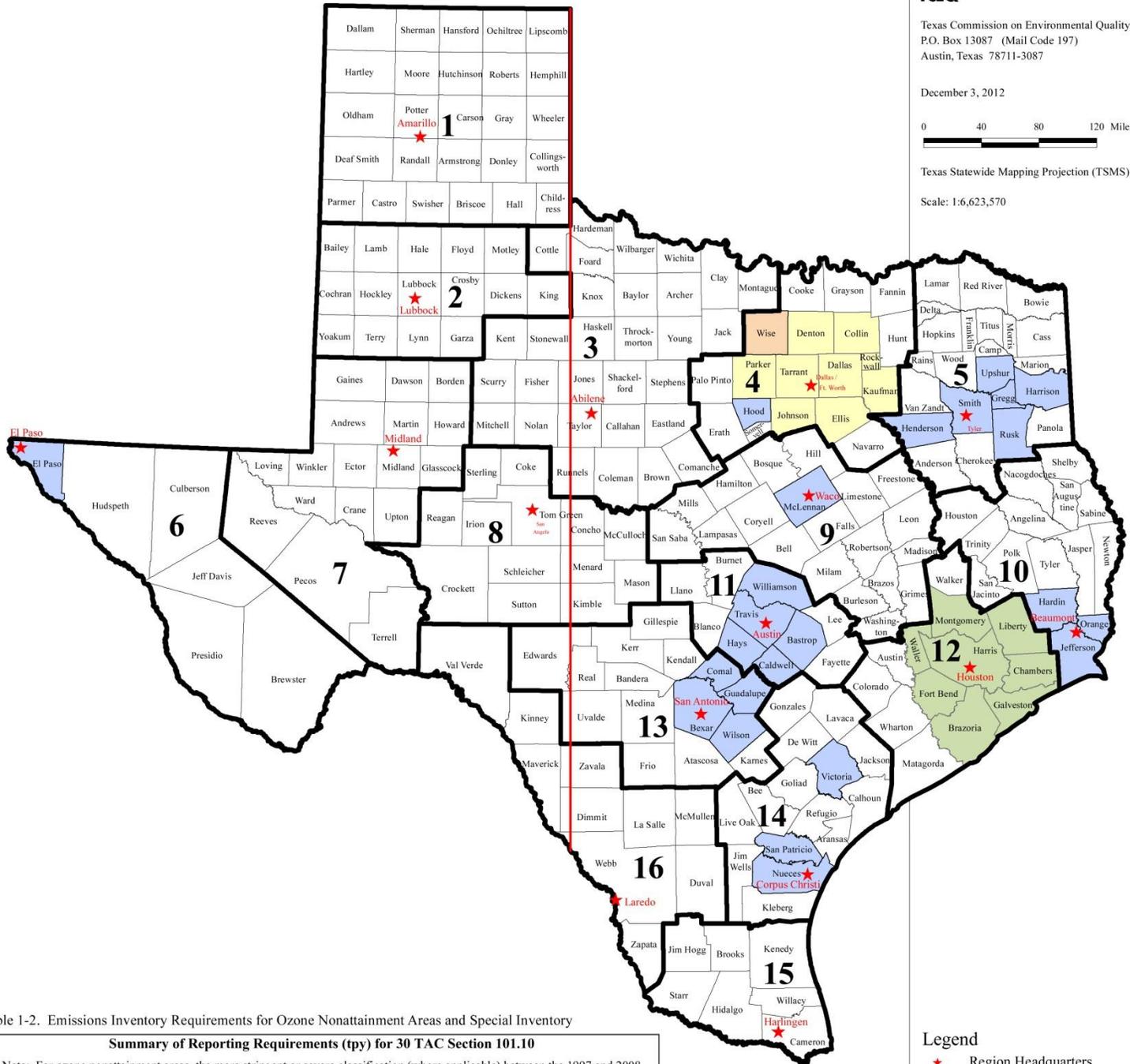


Table 1-2. Emissions Inventory Requirements for Ozone Nonattainment Areas and Special Inventory

Summary of Reporting Requirements (tpy) for 30 TAC Section 101.10										
Note: For ozone nonattainment areas, the more stringent or severe classification (where applicable) between the 1997 and 2008 ozone standards is used to determine reporting requirements for ozone precursor potential emissions.										
County CLASSIFICATION / POLLUTANT	VOC		NO _x		Other		Individual HAP		Aggregated HAP	
	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential
Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller SEVERE / OZONE	10	25	25	25	100	100	10	10	25	25
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant SERIOUS / OZONE	10	50	25	50	100	100	10	10	25	25
Wise County MODERATE / OZONE	10	100	25	100	100	100	10	10	25	25
See county listing below** SPECIAL INVENTORY REPORTING THRESHOLDS FOR OZONE PRECURSORS	10	100	25	100	100	100	10	10	25	25
All Other Counties	100	100	100	100	100	100	10	10	25	25
Statewide	Lead (Pb) Actual					Lead (Pb) Potential				
SPECIAL INVENTORY REPORTING THRESHOLDS FOR LEAD (All counties)	0.5					5				

Note: If an account's emissions meet or exceed the tons per year (tpy) thresholds listed in this table, an emissions inventory questionnaire must be submitted to the TCEQ. This table is not the actual rule. If a discrepancy exists between the table and rule 30 TAC Section 101.10 and 30 TAC Section 116.12 (Major Stationary Source Definition), then the rule will take precedence.

**SPECIAL INVENTORY COUNTIES FOR OZONE PRECURSORS Bastrop, Bexar, Caldwell, Comal, El Paso, Gregg, Guadalupe, Hardin, Harrison, Hays, Henderson, Hood, Jefferson, McLennan, Nueces, Orange, Rusk, San Patricio, Smith, Travis, Victoria, Williamson, Wilson, Upshur.

Note for Special Inventory Requests: Regulated entities must complete and submit an EI if they meet the thresholds explained in the "Special Inventory Request" section in Chapter 1 and the TCEQ has initiated a formal written request.

Legend

- ★ Region Headquarters
- 12 Region Number
- County Boundary
- Central Meridian

Source: The county boundaries and region headquarters are U S Census Bureau 1992 Tiger/Line data (1:100,000).



This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.

Due Date

The EI is due on March 31 of the calendar year immediately after the reporting year unless otherwise specified in writing by the TCEQ.

Emissions inventories that are submitted through the STEERS-AEIR Web-EI system will not be considered late as long as the file is validated by the due date. After submitting the EI, the user will receive two e-mails. The first e-mail confirms that the data have been placed in the queue for validation processing. The second e-mail will state whether the submission passed or failed validation. If validation succeeded, the TCEQ will consider the EI “received” in accordance with 30 TAC Section 101.10. If validation failed, the user must correct the errors and submit the data again. The EI will not be assigned a received date until the EI passes validation.

Sample calculations and supporting documentation are part of a complete EI submission and must be either attached to the STEERS-AEIR Web-EI system (for non-confidential data) or postmarked (for confidential data) by the EI due date.

Inapplicability and Insignificant Change notification letters must be postmarked by the due date. If the owner or operator gained prior permission from the EAS to continue submitting on paper forms, the EI must be postmarked by the due date.

The owner or operator on the date that the inventory is due is responsible for submitting the EI. New owners or operators should ensure that they obtain all appropriate records necessary to accurately represent emissions for the full EI reporting period. To document compliance, the TCEQ recommends that the owner or operator use a delivery method that confirms receipt by the agency and keep a record of the confirmation on file.

Failure to receive a courtesy notification from the TCEQ regarding the required submission of the annual emissions inventory does not justify noncompliance with 30 TAC Section 101.10.

Note: If the due date falls on a weekend or legal holiday, the EI must be validated for STEERS-AEIR Web-EI system submissions or postmarked for notification letters or paper forms by the following business day per 30 TAC Section 1.7.

What Constitutes a Complete Submission?

A complete EI submission includes a complete and updated EI, a signed certification statement, sample calculations representative of the current processes at the site, summary test results if stack-test data are used to determine emissions, summary Relative Accuracy Test Audit

sheets if data from CEMS) or predictive emissions-monitoring systems data are used to determine emissions, material throughput forms, and Fugitive Data Forms if required by the Technical Supplement 3 in Appendix A.

Submission through the STEERS-AEIR Web-EI system serves as the certification and constitutes a legally binding electronic signature by the legally responsible party. The STEERS-AEIR Web-EI submission process includes an option for an electronic Emissions Events Certification signature (if applicable).

The TCEQ requires annual emissions inventory updates, initial emissions inventories and special emissions inventories to be submitted online through the STEERS-AEIR Web-EI system, using either the interactive Web entry or text-file upload. For additional requirements regarding EI submissions through STEERS-AEIR Web-EI system, refer to the sections later in this chapter and the information at the EAS Web page <www.tceq.texas.gov/goto/ieas>.

This section discusses various reporting situations in detail below. No matter what the reporting situation, failure to receive a request from the TCEQ to submit the annual emissions inventory does not justify noncompliance with 30 TAC Section 101.10.

Requirements for a New Emissions Inventory or Updating an EI

If a site has not previously submitted an emissions inventory and it meets the EI reporting requirements of 30 TAC Section 101.10 for a given calendar year (reporting year), then the owner or operator is required to submit an initial emissions inventory (IEI).

Any regulated entity that continues to meet the EI reporting requirements of 30 TAC Section 101.10 is required to submit an annual emissions inventory update (AEIU).

When submitting the IEI or AEIU through the STEERS-AEIR Web-EI system, the following information must also be submitted:

- A Core Data Form (TCEQ-10400). For an IEI, this form is necessary when the information is not yet in the Central Registry. For an AEIU, the form is necessary for sites updating ownership, name or location. If this form has already been submitted to the Central Registry, please include a copy with the EI.
- Supporting documentation and sample calculations representative of the current processes at the site.

The Core Data Form, supporting documentation and sample calculations may be submitted using the document-attachment function in the STEERS-AEIR Web-EI system. Supporting documentation and sample

calculations that are considered confidential must be mailed to the EAS. Consult the section entitled “Confidential Data and Other Information” below for instructions on submitting supporting documentation that is considered confidential.

When sending electronic files, ensure that the data are self-contained and not linked to external data sources unavailable to the TCEQ. For electronic files, the preferred formats are Microsoft Word, Excel, Access, and Adobe PDF.

Note: The EAS will no longer accept emissions inventories submitted by mail on an external medium, such as CD. All EIs must be submitted through the STEERS-AEIR Web-EI system. For more information on how to submit online, please see the EAS Web page at <www.tceq.texas.gov/goto/ieas> or contact the EAS.

Special Requirements for a Site that Experienced Insignificant Changes in Emissions

Submission of an updated EI is not required if the total actual annual emissions of VOCs, NO_x, CO, SO₂, Pb, and PM₁₀ are **each** within 5 percent or five tons, whichever is greater, of the most recent total actual annual emissions reported in the STARS database. Instead, the owner or operator may request that the EAS copy the most recent annual emissions to the current reporting year.

If the site experienced **no** emissions due to emissions events (EE) and scheduled maintenance, startup, or shutdown (SMSS) activities, then the owner or operator may formally request to have the EAS copy the most recent annual and ozone season emissions to the current reporting year by submitting the following by the EI due date:

- a letter similar to the Insignificant Change Notification letter in Appendix B;
- the Account Information and Emissions Inventory Contact Information, page 2 of the EIQ;
- the Criteria Emissions Totals and Site Quantifiable Event Totals, page 3 of the EIQ with the current year’s totals entered; and
- the signed Emissions Events and Legally Responsible Party certification statements, page 4 of the EIQ.

If the site experienced emissions due to EE and SMSS activities, the owner or operator may still submit a formal request to have the EAS copy the most recent annual and ozone season emission rates to the current year. However, the emissions from EE and SMSS activities are required to be updated by submitting the following by the EI due date:

- a letter similar to the Insignificant Change Notification letter in Appendix B;

- the Account Information and Emissions Inventory Contact Information, page 2 of the EIQ;
- the Criteria Emissions Totals and Site Quantifiable Event Totals, page 3 of the EIQ;
- for regulated entities reporting only SMSS emissions and not reporting emissions events, the signed Emissions Events certification statement, page 4 of the EIQ;
- the signed Legally Responsible Party certification statement, page 4 of the EIQ; and
- all applicable pages relating to path emissions of the original EIQ updated to reflect emissions from EE and SMSS activities.

The hard-copy letter must be delivered to the EAS; currently there is no option to submit an Insignificant Change Notification letter through the STEERS-AEIR Web-EI System. The necessary EIQ pages for the certification signatures, EI contact information and EE and SMSS activities can be printed and mailed. A printable version is available through the Integrated Web Reporting System at the Central Registry Web page <www.tceq.texas.gov/goto/cr-query>. Instructions for navigating the Central Registry Web pages and downloading an EIQ formatted for printing are available at <www.tceq.texas.gov/goto/eiqprint>.

For this reporting situation, sample calculations and other supporting documentation may need to be supplied upon request.

Note: The Insignificant Change Notification letter and the certification statements must be signed by a responsible official of the company. These documents cannot be signed by a consultant.

If a Site Does Not Meet the Requirements of 30 TAC Section 101.10 for the Current Emissions Inventory Year

If an account receives an EI notification request letter and the owner or operator has determined that a site does not meet the EI reporting requirements of 30 TAC Section 101.10 for the current inventory year, but may meet applicability requirements in future years, then the site must submit an Inapplicability Notification letter (Appendix B) or similarly worded letter by the EI due date. In this reporting scenario, choose “Option 1” on the Inapplicability Notification letter in Appendix B to keep the site on the mailing list. The hard-copy letter must be delivered to the EAS; currently there is no option to submit an inapplicability notification through STEERS-AEIR Web-EI system.

Note: By signing this letter or a similar letter, the owner or operator of the regulated entity will remain on future EAS mailing lists and continue to receive a request to submit annual emissions inventories. The owner or

operator must submit a letter to the agency for each reporting year that the site does not meet the reporting requirements. The letter must be signed by the owner or operator and may not be signed by a consultant or other employee or agent.

For this reporting situation, sample calculations and other supporting documentation may need to be supplied upon request.

If a Site Does Not Expect to Meet the Requirements of 30 TAC Section 101.10 in Future Years

If the owner or operator has determined that a site does not meet the applicability requirements of 30 TAC Section 101.10 for the current reporting year and does not expect to do so in future reporting years, then the owner or operator may formally request the site's removal from the EAS mailing list by submitting an Inapplicability Notification letter (Appendix B) or a similarly worded letter by the EI due date. In this reporting scenario, choose "Option 2" on the Inapplicability Notification letter in Appendix B to remove the site from the mailing list. The hard-copy letter must be delivered to the EAS; currently there is no option to submit an Inapplicability Notification through STEERS-AEIR Web-EI system.

Note: The owner or operator—not a consultant or other employee or agent—must sign a letter requesting this action. The EAS only accepts written requests for removal from the mailing list.

AEIU requests are based primarily on the most recent EI as it appears in the STARS database. If the latest emissions reported in the STARS database exceed the rule applicability requirements, the TCEQ cannot remove the regulated entity from the annual EI mailing list unless the owner or operator submits a current updated EI and sample calculations. After the EI data are updated in STARS, the site can then be removed from the mailing list.

If the site is a major source as defined in 30 TAC Section 116.12 at any time during the calendar year, the site cannot be removed from the mailing list for that year. The owner or operator must submit an EI by the applicable due date.

An owner or operator must have federally enforceable emission limits that demonstrate that the site's PTE levels are below the EI reporting requirements as described in 30 TAC Subsection 101.10(a) before the TCEQ can remove the site from the mailing list. If the site meets the EI reporting requirements of 30 TAC Section 101.10 at any time during the calendar year, the owner or operator shall submit an annual emissions inventory for that calendar year. *Note:* If a major source has an active Title V permit due to PTE levels, the EAS will not remove the site from the mailing list.

For example, if the owner or operator of a major source lowers the

site's PTE levels below major-source thresholds by accepting federally enforceable limitations in an issued NSR permit in June of a calendar year, and actual emissions for that calendar year do not meet the reporting thresholds of 30 TAC Section 101.10, the owner or operator must submit an inventory for the entire calendar year, since site PTE levels were at or above major-source levels for part of the year. For the subsequent calendar year, if the site did not meet the reporting requirements of 30 TAC Section 101.10, the owner or operator can request to be removed from the mailing list.

If a regulated entity that has been removed from the mailing list meets the EI reporting requirements of 30 TAC Section 101.10 at any time in the future, it is the responsibility of the owner or operator to submit an EI by the due date.

If a Site Is Permitted but Not Built

If a site is permitted but not built, the requirement to submit an emissions inventory may not apply. However, an owner or operator may submit an initial emissions inventory in order to establish structure. Each facility's status should be coded "N" ('permitted but not built') and all emissions should be zero. However, due to database requirements, seasonal percentages must total 100. For more information on reporting structure for sites that are "planned" or "under construction," contact the EAS.

Sample Calculations

Per 30 TAC Subsection 101.10(c), sample calculations representative of the processes at the site must be submitted with the inventory and updated each year. Submit sample calculations showing determinations of actual annual emissions for each different type of process present in the EI, including enough data so that the determination results may be reasonably reproduced. The TCEQ cannot accept generic sample calculations, since they do not contain representative process data and do not demonstrate actual annual emissions determinations. For similar reasons, summary spreadsheets listing emissions quantities are not considered sample calculations. Sample calculation templates giving minimum requirements for common source types appear on the EAS Web page.

Refer to the following guidelines when sending representative sample calculations:

- When several sources of the same type are present and a **single** calculation methodology was used to determine emissions:
 - Include calculations for the source with the highest emissions.
 - Include the current reporting year's process data for each source for which sample calculations are not supplied.

- When several sources of the same type are present but **different** calculation methodologies were used to determine emissions:
 - Include calculations for the source with the highest emissions for each calculation methodology.
 - Include typical process data for each source that uses a different calculation methodology and for which sample calculations are not supplied.

Examples of the current reporting year's process data include heat inputs and fuel types for combustion sources and chemical types and throughputs for storage tanks and loading sources.

Confidential Data and Other Information

The TCEQ holds data confidential as requested in accordance with agency policy and rules (see 30 TAC Section 1.5) unless the Texas Attorney General's Office rules or a court issues an opinion that the data are not protected by state law. If there are any special concerns about confidentiality, contact the EAS. Confidentiality claims do not justify withholding relevant information from the TCEQ.

The following information will be kept confidential in accordance with agency policy and rules (see 30 TAC Section 1.5) unless the Texas Attorney General's Office rules or a court issues an opinion that the data are not protected by state law:

- material data (as reported on material throughput forms)
- process flow diagrams
- process rates
- trade secrets (information that reveals secret processes or methods of manufacture or production)

Information *not* considered confidential includes:

- emission rates
- heat-input data
- emission point data
- type of emissions control equipment
- type of emitting equipment

Please do not submit confidential information through the STEERS-AEIR Web-EI system or by e-mail to the EAS. Confidential information should be submitted in hard copy, with each page clearly marked as confidential or burned onto a CD marked as confidential.

Web Reporting

Two options are available for updating EI data: an interactive Web entry system or text file upload.

Reporting an IEI or Submitting an AEIU through Interactive Web Entry

IEIs and AEIUs can be submitted through interactive Web entry in STEERS, but please contact the EAS before submitting an IEI through STEERS. Interactive Web entry allows updating of the EI data on the company, site, contacts, facility, control devices, emission points, and path emissions through graphical-user-interface windows. The user may save the data in the work area in one or more work sessions until interactive Web entry for the entire updated EI is complete. Users who have historically submitted EI updates on paper may prefer this process. Built-in data checks help prevent errors such as missing required information, data in the wrong format, or limited data that fall outside preset constraints. After all of the required EI data is entered, the AEIU is submitted through STEERS. The system will run validation routines—typically overnight—and inform the user of the status (usually the following business day) by e-mail. If no errors were encountered, the e-mail will state, “AEIR validation process successful,” and the electronic submission will be considered complete. If errors were encountered, the e-mail will state, “AEIR validation process failed,” and an error log will be attached with instructions for viewing the log through STEERS. The STEERS user must correct the errors and attempt validation again. The system will also supply the user with a copy of record of the transacted data.

Note: All file-status e-mails are sent to each individual with “submit” authorization as identified by STEERS.

A date of receipt will be assigned to the file on the day the validation is successful. The TCEQ must receive a validated file by the EI due date. Otherwise, it will consider the AEIU submission delinquent. The sample calculations and supporting documentation must also be submitted by the EI due date.

The STEERS-AEIR Web-EI system features a document-attachment function that allows inclusion of non-confidential sample calculations and supporting documentation with the Web-EI submission. The document-attachment function is the primary method for submitting sample calculations and supporting documentation. For electronic files submitted through STEERS, the preferred formats are Microsoft Word, Excel, Access and PDF.

Additional information on reporting through the STEERS-AEIR Web-EI system appears at the EAS Web page, <www.tceq.texas.gov/goto/ieas>.

Reporting an IEI or Submitting a Text File of the AEIU Online through STEERS

IEI and AEIU can be updated and submitted through a text-file upload in STEERS. Please contact the EAS before submitting an IEI through STEERS. The text file must be in an approved electronic format, as outlined in the *Electronic Emissions Inventory File Specification*, available online at <www.tceq.texas.gov/goto/starsguide>.

Two steps are required to submit the AEIU text file. First, the text-file must be loaded into the STEERS work area from the user's personal computer. After the AEIU text-file is submitted to the STEERS work area, the TCEQ will respond via e-mail, detailing whether the system accepted the AEIU text file. Second, the user will submit the file from the STEERS work area to the EAS. The system will run validation routines, typically overnight, and inform the user of the status, usually the following business day, by e-mail. If no errors were encountered, the e-mail will state "AEIR validation process successful" and the AEIU text-file submission is considered complete. If errors were encountered, the e-mail will state "AEIR validation process failed." The system will also supply the user with a copy of record of the transacted data. *Note:* All file-status e-mails are sent to each individual with "submit" authority as identified by STEERS.

If the AEIU text file does not pass the validation routine by the EI due date, the TCEQ will consider the AEIU submission delinquent. The sample calculations and supporting documentation must also be submitted by the EI due date for the submission to be considered complete.

Additional information on reporting through the STEERS-AEIR Web-EI system appears on the EAS Web page, <www.tceq.texas.gov/goto/ieas>.