CHAPTER 7—EI REVISIONS, DATA REQUESTS, SITE COORDINATE DATA

This chapter covers submitting EI revisions, requesting EI data, and reviewing site coordinate data.

A regulated entity can make a revision request to correct erroneous EI data it previously reported. A discussion on how to submit a revised EI for the current and previous reporting years is included in this chapter.

Regulated entities may request historical EI data from the TCEQ. Whether the request is for retrieving electronic data from STARS or for viewing a historic EI file, procedures are in place to request such information. This chapter discusses what data the TCEQ can supply and when an "open records" request may be more appropriate.

Because EPN and site centroid coordinate data are used for modeling, the TCEQ may request updates to those data. This chapter discusses coordinate data and can assist in locating a site's coordinates.

Revising an EI

Current and Previous Reporting Year

All revision requests are subject to TCEQ review and approval. In the cover letter, indicate the years being revised: the current year, the year immediately prior, or both.

For any of the methodologies, data from a current year must not be used to report or revise emissions for any previous year's EI. For example, if NO_x emissions from an engine were stack tested in calendar 2016; those test results can be used starting with the 2016 EI. The stack-test results cannot be used to report NO_x emissions in the 2015 EI, or to revise any EI submitted for a year prior to 2016.

Please note: Revision requests are processed as time permits. Generally processing takes place after the TCEQ has reviewed all emissions inventories for the current reporting year.

What Is Required

A revision must address errors in the self-reported EI. Submit the following to revise EI data:

- a signed cover letter describing the revisions being made and the reason for the revisions
- revised EIQ pages only
    - it is not necessary to submit the entire EIQ (STEERS printouts are not an acceptable format for submitting revisions)

  - a printable version of the EIQ is available through the Integrated Web Reporting System at the Central Registry website <www.tceq.texas.gov/goto/cr-query>
  - instructions for navigating the Central Registry website and downloading an EIQ formatted for printing are available at <www.tceq.texas.gov/goto/eiqprint> (opens a PDF file)
- updated criteria emissions totals for the site (found on page 3 of the EIQ) to help identify any errors in entering or submitting data
- detailed sample calculations and supporting documentation for the revised emissions—see Chapter 1 for additional instructions

Note: When printing the EIQ using the Central Registry's Integrated Web Report, the previous reporting year will appear on the EIQ pages. The EIQ referenced is a historical report containing the latest data as entered in STARS. To update, cross out the previous year on page 2 of the EIQ write the current reporting year. It is not necessary to update the year for subsequent EIQ pages.

Note: Please use permanent ink instead of pencil when revising the EIQ. Pencil tends to smudge and can be difficult to read, increasing the chance of data-entry errors or omissions. For each revision, use a different ink color to distinguish the most recently corrected EI information. There are no restrictions on ink color, but colors other than black make EIQ updates more noticeable.

To obtain an electronic copy of the most current data for the EI revision year, contact the EAS. The EAS help-line number is 512-239-1773.

How to Submit

The revised EIQ pages submitted to the TCEQ must be printed on only one side of the page and not copied on both sides of the page (do not duplex). Do not submit pages printed from STEERS. STEERS printouts are not an acceptable format for submitting revisions.

Contact the EAS to identify the staff member assigned to review the EI for the current year. When submitting revisions, address them to the applicable EAS staff member at MC 164.

Other Reporting Years

All revision requests are subject to TCEQ review and approval. If the revision request is for a year two to four years prior to the current reporting year, the TCEQ may or may not update the emissions data in STARS. The TCEQ will review revision requests to determine if the data currently in STARS should be updated. This review takes into account the justification for the revisions, the EI year in question, and the magnitude of the change in emissions, if applicable. For any of the methodologies, data from a current year must not be used to report or revise emissions for any previous year's EI. For example, NO_x from an engine was stack tested

in calendar year 2016; those test results can be used starting with the 2016 EI. The stack-test results cannot be used to report NO_x emissions in the 2015 EI, or revise any previous year's EI.After the review, the TCEQ will determine whether to update the emission revisions in STARS or, alternatively, to file them in the EI folder. Since each revision is unique, the TCEQ recommends that the owner or operator contact the EAS to address any questions about the submitted revisions.

Requests for revisions to EI reporting years five or more years prior to the current reporting year will be filed with the appropriate EIQ and will be noted in the STARS tracking system.

Example: The current reporting year is 2015. Revision requests may be processed and updated in STARS for 2015 and 2014. The EAS will review revision requests for 2013, 2012, and 2011 case by case. The EAS will determine whether the emissions will be updated in STARS or filed in the EIQ folder. Revision requests for 2010 and earlier will be filed with the appropriate EIQ and noted in the STARS tracking system.

EI Data Requests

Historical EI data are available in several formats. Site-specific emissions inventory reports are available through the Central Registry Integrated Web Reports (IWR) system at <www.tceq.texas.gov/goto/cr-query>. Site-level EI information also appears online at the EAS Web page, while more detailed data can be obtained by completing and faxing an Emissions Data Request form (TCEQ-20473) to 512-239-1515 or e-mailing the form to <psinvent@tceq.texas.gov>. The Emissions Data Request form (TCEQ-20473) can be downloaded at <www.tceq.texas.gov/search_forms.html>. EI files can also be viewed in person at the TCEQ central office in Austin.

A data request may be referred to the TCEQ's open records request team when it involves other program areas or media. These types of requests can be made by e-mail to <openrecs@tceq.texas.gov> or in writing to the public information officer.

TCEQ Central Registry Integrated Web Reports

Site-specific emissions inventory reports are available through the TCEQ Central Registry IWR system, including path-level and site-level emissions, path-list reports, and the EIQ. The IWR Web page is at <www15.tceq.texas.gov/goto/cr-query>. For instructions on navigating the Central Registry online and obtaining emissions inventory reports, please refer to the following document (PDF file): <www.tceq.texas.gov/assets/public/implementation/air/ie/pseiforms/eireports.pdf>.

Data Available at the EAS Web Page

The EAS Web page titled Point Source Emissions Inventory <www.tceq.texas.gov/goto/ieas> links to easily accessible EI data. Before contacting the TCEQ for EI data, please refer to that Web page to make sure the information is not already available. Information available there includes emissions inventory trends, total criteria emissions for each site that reported an EI for the previous year, tools for completing an EI, this document, and emissions inventory forms.

Emissions Data Requests

To request emissions data, please complete the Emissions Data Request form and fax (512-239-1515) or e-mail <psinvent@tceq.texas.gov> the form to the TCEQ. The form can be downloaded at <www.tceq.texas.gov/goto/ieas>. The TCEQ will determine if the requested data are available electronically or if paper EI files are available for review. Please allow 10 business days for the TCEQ to contact you about your request.

For additional guidance on how to complete the form or on what EI data are available, please call the EAS help line at 512-239-1773.

Paper EI Data Requests

EI Files Available at the TCEQ Central Office

The TCEQ maintains files for the current EI reporting year and the two most recent years. To request them, contact the EAS help line at 512-239-1773. The account number or RN, company and site names, and EI years desired are required so the files can be identified and located.

Please allow at least 48 hours' notice to view a file for the TCEQ to retrieve it and to ensure it contains no confidential information. It will then be available in the Central File Room for review. Copying and various other services are also available.

After two years, EI files are transferred to the state archives at the Texas State Library.

Archived Files

If an EI file has already been sent to the Texas State Library, an "open records" request is necessary to obtain the file. This request can be made by e-mail to <openrecs@tceq.texas.gov> or in writing to the Public Information Officer. Please allow a few days for the state library to forward the files. For more information, visit <www.tceq.texas.gov/goto/openrecords>.

Coordinate Data

Spatial Queries and Mapping Application Viewer

Advancements in GIS software and its wide availability have drawn increased attention to obtaining accurate coordinate data for the site centroid and EPNs. Because site coordinates can potentially have an impact on emissions modeling, the TCEQ may request updates to them.

The TCEQ has recently made available an online viewer that uses Google Maps to help determine accurate coordinate data. See <www.tceq.texas.gov/goto/sqmaview>.