

# Reportable Event/Activity Notification/Reporting Form

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## INTRODUCTION

*These instructions, together with the referenced form, are provided as summary information only. Always refer to the most current version of the applicable rules when preparing and submitting any required information.*

Always comply with all applicable legal provisions, including the rules relating to Emissions Events (EEs), Excess Opacity Events (EOE), and Scheduled Maintenance, Startup and Shutdown (scheduled MSS) notification and reporting requirements which are found in the following sections of [30 TAC Chapter 101](#):

[§101.1](#) Definitions;

[§101.201](#) Emissions Event Reporting and Recordkeeping Requirements;

[§101.211](#) Scheduled Maintenance, Scheduled Start-up and Scheduled Shutdown Reporting, and Recordkeeping Requirements;

[§101.221 through §101.224](#) Operational Requirements, Demonstrations, Actions to Reduce Excessive Emissions, Temporary Exemptions During Drought Conditions

Additional applicable rules are found in [30 TAC 116](#) and the Clean Air Act ([Texas Health and Safety Code 382](#)).

## WHEN, HOW, AND WHERE TO REPORT

### When to submit Notifications and Reports

Regulated entities with facilities experiencing reportable EEs, or EOE are required to submit an initial notification *for each affected facility* no later than 24 hours after discovery of the “reportable” event in accordance with [30 TAC §§101.201\(a\)\(2\)](#) or [101.201\(e\)](#). Note that the term ‘facility’ used in these rules refers to the term as defined in the Texas Clean Air Act ([TH&SC §382.003\(6\)](#)) and in TCEQ rule ([30 TAC §116.10](#)).

Regulated entities expecting to perform certain maintenance, startup or shutdown activities (MSS) are expected to submit a prior notification for the activity, as detailed in [§101.211\(a\)](#) *for each affected facility*. Scheduled MSS activities which do not meet the definition of “scheduled maintenance, startup, or shutdown activity” in [§101.1\(91\)](#) are considered to be EEs and are subject to the reporting and recordkeeping requirements applicable to EEs, set forth in [§101.201](#).

For all reportable EEs, if the information differs from the information provided in the initial 24-hour notification, the owner or operator of the regulated entity shall submit a copy of the final record to the commission office for the [region](#) in which the regulated entity is located and to appropriate [local air pollution agencies](#) with jurisdiction no later than two weeks after the end of the EE or scheduled MSS activity (see [30 TAC §§101.201\(c\)](#) and [101.211\(c\)](#) respectively). It is important to note that if a final report is not submitted within the required deadline, the initial report becomes the final report.

### How to submit Notifications and Reports

Regulated entities subject to and experiencing a reportable EE are required to make reports through the State of Texas Environmental Electronic Reporting System ([STEERS](#)) Air Emissions and Maintenance Events (AEME) web-based electronic reporting system. Each individual within an organization who wishes to submit notifications and reports are required to [create their own STEERS account](#) and sign a STEERS participation agreement. Registered users will receive email updates on the web-based reporting interface.

[Form 10360](#) will be used any time STEERS is unavailable. Reports or notifications must be made by facsimile as allowed by [30 TAC §101.201\(g\)](#). In addition, this facsimile form may be used in lieu of electronic STEERS reporting by small businesses. Consult [30 TAC §101.201\(g\)](#) for details on electronic submittals.

## Where to submit

When faxing this form, notifications and reports are required to be submitted to the [TCEQ regional office](#) and any appropriate [local air pollution control agency](#) whose jurisdiction includes the site experiencing the event or activity ([30 TAC §§101.201\(a\)\(1\)\(B\)](#) and [101.211\(a\)](#)). Likewise, final reports are required to be submitted to the appropriate TCEQ regional office. Addresses and fax numbers are provided on the back of the form in the case of difficulty in accessing the agency's web pages.

## WHAT TO REPORT: COMPLETING THIS FORM

It is imperative that the form be completed accurately and completely.

### General Directions for the Form

- Be as specific as possible; complying with the notification and reporting requirements is one of the conditions for meeting affirmative defense criteria for the event or activity.
- If a field on the form does not apply to the facility, mark it N/A.
- The form is designed to be used in an initial notification for an EE, an EOE, or a scheduled MSS or as a final report for EEs and scheduled MSSs.
- **Please be aware that the rule requires information related to each facility to be reported individually.** This form is designed for reporting information about *a single facility only*. *Events that affect multiple facilities will require submission of multiple forms.*

Please note that there are distinct legal requirements for EEs, EOE, and scheduled MSSs, and depending upon whether the submission is a notification or a report. Please refer directly to the applicable rules to ensure that the submission complies with all applicable legal requirements.

### Field-Specific Instructions

Each field on the form is described below:

#### Submittal Type

Mark an "x" in the appropriate box on the form to indicate if the notification is an initial notification or a final report. For electronic reporting purposes, the TCEQ web interfaces (i.e. STEERS and public view query) will only identify initial notifications and final reports.

**Name of Owner or Operator, Regulated Entity (RN)/Air Account (Acct) Number (#), Physical Location, Process Unit or Area,**

Provide the name of the owner or operator of the site.

Provide the TCEQ Regulated Entity Number (RN). The designated RN must identically match and correspond with the provided information in [TCEQ Central Registry](#).

Provide the air account number. Most sources with historic air account numbers (e.g. GG1234X) will have an RN and should also be listed.

Some situations will occur where the regulated entity does not have either a RN or a historic air account number. If that is the case, this space may be marked N/A. Final reports should contain the RN. Contact your [regional office](#) for information on how to obtain a RN.

The physical location is intended to provide the best description of a physical address or geographic location where unauthorized emissions occur or are expected to occur. Physical location should be sufficiently descriptive so that the facility involved in the event or activity can be easily located.

The names for a process unit/area, facility and emission point are names or identifiers commonly used to describe the general area at the site where the facility involved in the EE, EOE, or scheduled MSS is located.

**Facility and Emission Point Common Names, Facility Identification Number (FIN) and Emission Point Number (EPN)**

The facility common name is the source of the unauthorized emissions, while the emissions point common name is the point at which the unauthorized emissions escape into the atmosphere.

While not every facility or emission point has agency-established identifiers, submittal of such numbers for facilities and emission points with relevant agency established identification numbers is required under [30 TAC §§101.201](#) and [101.211](#) when making appropriate submissions. Agency established identifiers are typically assigned during the permitting or emissions inventory processes. Consult the facility specific permit to find the FIN and EPN. If the site is subject to the emissions inventory requirements of [30 TAC §101.10](#) then provide the FIN and the EPN for the emissions specific point of origin. The Emissions Assessment Section in the Air Quality Division of the TCEQ at (512) 239-1459 can answer general questions about the emissions inventory requirements. Information is also available on the [Point Source Emissions Inventory webpage](#).

If the unit involved in the event does not have agency established FIN's and EPN's then put N/A.

Examples of identifying a source involved in an event, follow:

**Example 1**

A site with a registered permit and subject to emissions inventory requirements, with a process commonly known as the "Coating Area". and with a coating line commonly known as "line A" that is listed in air permit number 12345 needs to identify the source. In the emissions inventory or allowable emissions rates table registered for that site, the FIN is listed as "LINEA" and an EPN called "INCINA". If unauthorized emissions occurred related to this site and involved emissions from this process due to incinerator malfunction, then the identifications are as follows:

**Process Unit Common Name:** Coating Area

**Facility Common Name:** Line A  
**Emission Point Common Name:** Incinerator A  
**FIN:** LINEA **EPN:** INCINA

**Example 2**

A site with a process unit named “Mayfair Compressor Station” which is *not* registered and has a compressor engine, “Engine 4,” needs to identify the facility where an unauthorized release occurred through the Common Blowdown vent. The facility identification will be as follows:

**Process Unit/Area Common Name:** Mayfair Compressor Station  
**Facility Common Name:** Engine 4  
**Emission Point Common Name:** Common Blowdown vent  
**FIN:** N/A **EPN:** N/A

### **The Event / Activity Type**

Indicate the type of event or activity for which unauthorized emissions notification or reporting is being given by placing an 'x' appropriately.

### **Date and Time**

Use military time to indicate the time the event started.

The rules require that an estimate of the time of discovery and duration be provided, but please provide actual time when known.

For scheduled MSS, for which prior notification is being submitted, enter the date and time the activity is expected to begin.

For final records of a scheduled MSS activity which have commenced or are completed, enter the date and time the activity started.

### **Duration of Event**

Indicate the duration of the event as required by the rules. If the event has ended and the event duration is known then indicate in hours, minutes, seconds. If the event is ongoing, provide a duration estimate.

### **List of Compound Descriptive type(s) of Individually Listed or Mixtures of Air Contaminant Compounds Released, Including Opacity**

In this field, indicate the compounds or mixtures released (or anticipated to be released) during this event or activity. The listed material should be consistent with compounds and mixtures listed in the definition of reportable quantity (RQ), [30 TAC §101.1\(89\)](#).

An EE or scheduled MSS initial notification requires that each air contaminant or air contaminant compounds or mixtures that were released or expected to be released, in amounts equal to or above the reportable quantity, be listed individually. Note that certain boilers and combustion turbines referenced in the definition of RQ's in [30 TAC §101.1\(89\)](#), pursuant to [30 TAC §101.201\(a\)\(3\)\(G\)](#) and facilities with only an excess opacity event or activity need only to list opacity in the notification. (See "Reporting Opacity" section below.)

### **Estimated Total Quantity for Air Contaminants for Emissions/ Opacity Value for Opacity**

An EE or scheduled MSS that constitutes a final report, requires that all air contaminant compounds, or mixtures released to the atmosphere be reported **in pounds**. When addressing emissions, report the total quantity of material released due to the event or activity, not only the quantity of material released above any authorized limits that exists in the rules or permits. When estimating emissions, one should use monitoring data. When actual monitoring data is not available, then estimation techniques consistent with those used in the preconstruction authorization application for the facility is next best, followed by the current [emissions inventory guidance](#). In all cases, good engineering methodology is expected.

### **Reporting Opacity**

Opacity is defined by the EPA as the property of a substance whereby it partially or wholly obstructs the transmission of visible light expressed as the percentage to which light is obstructed. When no plume is observed, the percent opacity would be "0%", whereas a completely opaque plume (i.e., no light getting through the plume) would have an opacity of "100 %".

Where reporting opacity is required, EPA Method 9, EPA Method 22 or a properly installed and operating

continuous opacity monitor (COMs) is the best method for estimating opacity. The quantity value required to be reported is the quantity above zero, not the quantity above any applicable limit that may be imposed through applicable rules or permits.

**Authorized Emissions Limit/Units**

Emissions limits for compounds or mixtures are authorized by various permits, rules, and orders and are therefore stipulated by various methods using units of measure such as pounds per hour (lbs/hr), opacity exceedance greater than limit (%) for (x) minutes per hour. Provide the same measure of units as noted in the authorized limitation.

**Authorization (Rule or Permit No.)**

Provide the permit number or the rule citation authorizing to the facility.

**Cause of Emissions Event / Reason for Scheduled Activity:**

If known, the cause/reason for the EE or scheduled MSS should be noted in the initial notification. If the cause was unknown and was not noted in the initial report, the cause/reason must be reported in the final report. The narrative should be as precise as possible in the description of the cause of the EE or EOE, or of the reason for the scheduled MSS.

**Actions Taken, or Being Taken, to Minimize and Correct the Emissions Event:**

The narrative should be as precise as possible. Provide explicit information on how the regulated entity brought the unit back into compliance and how the unauthorized emissions were controlled.

**Basis used to Determine Quantities and Additional Information Necessary to Evaluate the Emissions Event:**

This information is required for initial notifications of scheduled MSS activities and for all final reports. It is

expected that enough detail be provided to show how emissions estimates were determined. If necessary, one may reference specific external documentation, provided that such documentation is submitted concurrently with the report or is readily available in the current agency files.

**Person Making Notification/Date and Time, Phone**

Provide the name and phone number of the person making the notification and give the date and time the submittal was made.

**Incident Contact Person, Phone/E-mail**

Provide the name and phone number of the person with direct knowledge of the circumstances related to the event or activity, and who should be contacted for additional information about this event. An e-mail address must also be provided for communication regarding this event or activity.

**Jurisdiction(s) Notified**

Please indicate the [TCEQ regional office](#) and any appropriate [local air pollution control agency](#) that requires notification or reporting of this event or activity or have been notified.