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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 31, 2017

CONTACT or Air Emissions Inventory Contact
COMPANY
ADDRESS 1
ADDRESS 2
CITY, STATE ZIP

Re: Calendar Year 2017 Air Emissions Inventory Information for
Regulated Entity: REGULATED ENTITY NO Air Account: ACCOUNT NO

Dear Emissions Inventory Contact:

This letter provides notification from the Texas Commission on Environmental Quality (TCEQ) that a Calendar Year 2017 air emissions inventory (EI) for the regulated entity identified above may be required, per the reporting requirements of 30 Texas Administrative Code Section (§) 101.10. Per Texas Health and Safety Code, § 382.014, the TCEQ has the authority to request a regulated entity to submit air emissions data to develop a statewide air EI. Per § 101.10, either a Calendar Year 2017 EI or written notification that the above-referenced site is not subject to the EI reporting requirements is required to be submitted by March 31, 2018, or 90 days from the date of this letter, whichever is later.

The required method for submitting an EI is through the State of Texas Environmental Electronic Reporting System (STEERS)-Air Emissions Inventory Reporting (AEIR) system, using either the interactive Web entry or text file upload. Enclosed please find the "Emissions Inventory Reporting Options" that provides information on the two STEERS-AEIR reporting options. The second enclosure titled "Information for the 2017 EI Request" provides instructions for obtaining a copy of the *Emissions Inventory Guidelines*, a list of updates for 2017, special inventory notice, and additional guidance for completing a 2017 EI.

The owner or operator on the date the inventory is due is responsible for submitting the EI. If you will not be the owner or operator on the EI due date, please contact the Emissions Assessment Section (EAS) as soon as possible.

If you have questions, please call the EAS helpline at (512) 239-1773.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kevin Cauble".

Kevin Cauble, Manager
Emissions Assessment Section
Air Quality Division

KC/JD/ro

Enclosures

Web-Emissions Inventory (EI) Reporting Options for the 2017 Reporting Year

Guidance documents and tools for both Web-reporting options are available at www.tceq.texas.gov/goto/ieas.

Option One: Submit your EI online using the State of Texas Environmental Electronic Reporting System (STEERS) interactive website (Web entry method)

Regulated entities can submit a 2017 EI through the STEERS Web interface. Regulated entities can choose the “EIQ Entry” option in the Annual Emissions Inventory Report (AEIR) program area of STEERS to manually create or update and submit a 2017 EI.

Initial emissions inventories can also be submitted using the online Web entry method. If the regulated entity has never submitted an EI, please contact the Texas Commission on Environmental Quality Emissions Assessment Section helpline at 512-239-1773 for assistance.

Option Two: Submit an EI text file online using STEERS (text file upload method)

Regulated entities can submit a 2017 State of Texas Air Reporting System (STARS) formatted EI text file through the STEERS Web interface. Regulated entities can choose the “Upload File” option in the AEIR program area of STEERS to submit the STARS EI text file.

PLEASE NOTE: Electronically formatted EI submissions will only be accepted *through the STEERS Web interface*. **To obtain the 2017 EIQ Extract File for a site, use the following link:**

www.tceq.texas.gov/airquality/point-source-ei/emissions-inventory-extracts-for-electronic-reporting

Information for the 2017 Emissions Inventory (EI)

Why the regulated entity received this EI notification:

The regulated entity described in the enclosures of this letter may have received this formal written notification because:

- the regulated entity meets the reporting requirements of 30 Texas Administrative Code (TAC) Sections (§) 101.10(a)(1)-(5) for submitting an EI; or
- the regulated entity is being requested to submit an EI under the special EI provisions of 30 TAC § 101.10(b)(3).

The official version of 30 TAC § 101.10 is located at the Secretary of State's website at www.sos.texas.gov/tac/index.shtml. Effective July 28, 2016, 30 TAC § 101.10 was revised to align the EI reporting threshold for lead (0.5 tons per year [tpy]) with the Environmental Protection Agency Annual Emissions Reporting Rule in 40 Code of Federal Regulations Part 51 and additional minor clarifications and updates were also made. For a summary of these updates, please see the Emissions Assessment Section (EAS) webpage at www.tceq.texas.gov/goto/ieas.

If you have received this notification to submit a Calendar Year 2017 EI, you have been formally notified that the Texas Commission on Environmental Quality (TCEQ) is conducting a special EI for ozone precursors under the authority of 30 TAC § 101.10(b)(3). A completed EI must be submitted by the owner or operator of:

- a regulated entity that is located in Bastrop, Bell, Bexar, Caldwell, Comal, El Paso, Gregg, Guadalupe, Hardin, Harrison, Hays, Henderson, Hood, Jefferson, Orange, McLennan, Nueces, Rusk, San Patricio, Smith, Travis, Upshur, Victoria, Williamson, or Wilson County and that emits 10 tpy of volatile organic compounds or 25 tpy of nitrogen oxides (NO_x) during normal operations.

If the regulated entity described in the enclosures of this letter meets the reporting requirements of 30 TAC § 101.10(a)(1)-(5) or is requested to submit a special EI, a completed EI must be submitted. Otherwise, a signed written statement explaining why the referenced regulated entity does not meet the EI reporting requirements must be submitted by the due date. The completed EI or signed written statement must be received by the TCEQ by March 31, 2018, or within 90 days of this letter, whichever is later. If the EI due date falls on a weekend, the EI must be submitted by the following business day per 30 TAC § 1.7.

2017 Emissions Inventory Guidelines: What's new?

The *2017 Emissions Inventory Guidelines* provides guidance for understanding the EI reporting requirements and explains how to correctly complete an EI. The EAS webpage www.tceq.texas.gov/goto/ieas provides additional helpful sources such as instructions for Web-EI Reporting, lists of abatement and contaminant codes, a frequently asked questions document, and forms to update certain structure changes that cannot be completed using the Web-EI system.

Some of the updates, clarifications, and considerations to the *2017 Emissions Inventory Guidelines* include:

- emphasized that submission through the Web-EI system serves as the certification and constitutes a legally binding electronic signature; therefore, consultants cannot be given Submit Authority or submit the EI through the Web-EI System (Chapter 1);
- added that when the EI is revised, notice should be given to other program areas that maybe impacted (i.e. Air Fees program) (Chapter 7);
- clarified that when marine loading emissions are abated, the collection efficiencies should follow Air Permit Guidance (Technical Supplement 5);
- added that when a marine facility uses vacuum loading, a 100% collection efficiency can only be claimed for inland marine vessel loading (Technical Supplement 5); and
- added Annual Air Fees contact reference to the EI Contact Information Form (www.tceq.texas.gov/goto/ieas).

The TCEQ is not including the *2017 Emissions Inventory Guidelines* with this package. This document is available for download from the EAS webpage at www.tceq.texas.gov/goto/ieas. To receive a paper copy, please contact the TCEQ's Publications staff at (512) 239-0028.