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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 31, 2020

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

Re: Calendar Year 2020 Air Emissions Inventory Notification for
Regulated Entity: REGULATED ENTITY NO Air Account: ACCOUNT NO

Dear CONTACT:

This letter provides notification from the Texas Commission on Environmental Quality (TCEQ) that a Calendar Year (CY) 2020 air emissions inventory (EI) for the regulated entity identified above may be required by the reporting requirements of 30 Texas Administrative Code (TAC) Section 101.10. Per Texas Health and Safety Code, Section 382.014, the TCEQ has the authority to request a regulated entity to submit air emissions data to develop a statewide air EI.

This letter also provides notification that the TCEQ is conducting a special EI for ozone precursors under the authority of 30 TAC Section 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, Caldwell, Comal, El Paso, Gregg, Guadalupe, Hardin, Harrison, Hays, Henderson, Hood, Jefferson, McLennan, Nueces, Orange, Rusk, San Patricio, Smith, Travis, Upshur, Victoria, Williamson, or Wilson County; and
- that emits 10 tons per year (tpy) or more of volatile organic compounds or 25 tpy or more of nitrogen oxides during routine operations.

Per 30 TAC Section 101.10, either a CY 2020 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, 2021, or 90 days from the date of this letter, whichever is later. The official version of 30 TAC Section 101.10 is available at the [Secretary of State's](https://www.sos.state.tx.us) website ([https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=30&pt=1&ch=101&sch=A&rl=Y](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=30&pt=1&ch=101&sch=A&rl=Y)).

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,

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contact the Emissions Assessment Section (EAS) as soon as possible.

The required method for submitting an EI is through the State of Texas Environmental Electronic Reporting System Air Emissions Inventory Reporting system, using either the interactive Web entry or text file upload.

Additional information, including a sample copy of this notification letter, a list of *2020 Emissions Inventory Guidelines* updates, and details on the Web-EI reporting options can be found on the [Point Source Air Emissions Inventory](https://www.tceq.texas.gov/airquality/point-source-ei/psei.html) webpage (<https://www.tceq.texas.gov/airquality/point-source-ei/psei.html>).

If you have questions, please call the EAS helpline at (512) 239-1773 or by e-mail at psinvent@tceq.texas.gov.

Sincerely,



Danielle Nesvacil, Manager
Emissions Assessment Section
Air Quality Division

DN/CP/rlo

General Information for the 2020 Emissions Inventory

A regulated entity may have received an emissions inventory (EI) notification because:

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

The official version of 30 TAC Section 101.10 is available at the [Secretary of State's](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=30&pt=1&ch=101&sch=A&rl=Y) website ([https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=5&ti=30&pt=1&ch=101&sch=A&rl=Y](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=5&ti=30&pt=1&ch=101&sch=A&rl=Y)). An EI reporting requirements map with a summary table is located at the [Point Source Air Emissions Inventory](https://www.tceq.texas.gov/airquality/point-source-ei/psei.html) webpage (<https://www.tceq.texas.gov/airquality/point-source-ei/psei.html>).

If the regulated entity meets the reporting requirements of 30 TAC Section 101.10 or is requested to submit a special EI, a complete 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, 2021, or within 90 days from the date of the notification 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 Section 1.7.

2020 Emissions Inventory Guidelines: What's New?

The *2020 Emissions Inventory Guidelines* provides EI reporting guidance and can be found at the [Point Source Air Emissions Inventory](https://www.tceq.texas.gov/airquality/point-source-ei/psei.html) webpage (<https://www.tceq.texas.gov/airquality/point-source-ei/psei.html>).

Some of the updates to and clarifications in the *2020 Emissions Inventory Guidelines* include:

- Chapter 1 - added a section on submitting confidential information through the TCEQ secure File Transfer Protocol website;
- Chapter 1 - clarified that an Insignificant Emissions Change Notification letter or similarly worded letter is required to be submitted when the entire site's actual emissions are being copied from the most recently reported emissions to the current reporting year in the State of Texas Environmental Electronic Reporting System (STEERS);
- Chapter 1 - clarified that a hard copy of the Inapplicability and Insignificant Emissions Change Notification letters must contain a wet-ink signature of the appropriate responsible official (for Title V sites) or company representative (for sites that are not required to have a Title V permit);
- Appendix A - clarified that glycol units must be included as a source in the EI even if emissions are routed back into the process;

- Appendix A - added a section regarding pigging units;
- Technical Supplement 3 - clarified that certain non-monitored components may be excluded from emissions determinations; and
- Technical Supplement 6 - added that the TANKS software program is no longer an acceptable emissions determination method for the emissions inventory.

Web-Emissions Inventory Reporting Options for the 2020 Reporting Year

Guidance documents and tools for Web-reporting options are available at the [Point Source Air Emissions Inventory](https://www.tceq.texas.gov/airquality/point-source-ei/psei.html) webpage (https://www.tceq.texas.gov/airquality/point-source-ei/psei.html).

Option One: Submit an EI online using the STEERS interactive website (Web entry method)

Regulated entities can submit a 2020 EI through the STEERS Web interface. Regulated entities can choose the “EIQ Entry” option in the Annual EI Report (AEIR) program area of STEERS to update and submit a 2020 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 TCEQ EAS 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 2020 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-formatted EI text file.

PLEASE NOTE: The TCEQ will only accept electronically formatted EI submissions through the STEERS Web interface. 2020 EIQ extract files are located at [Point Source Air Emissions Inventory Extracts for Electronic Reporting](https://www.tceq.texas.gov/airquality/point-source-ei/emissions-inventory-extracts-for-electronic-reporting) webpage (https://www.tceq.texas.gov/airquality/point-source-ei/emissions-inventory-extracts-for-electronic-reporting).