

# **Point Source Emissions Inventory - What's New?**

#### Overview

- General point source emissions inventory (EI) applicability
- Potential impacts to point source EI reporting from:
  - 2015 Ozone National Ambient Air Quality Standard (NAAQS)
  - New particulate matter (PM) NAAQS
  - United States Environmental Protection Agency's (EPA) proposed Air Emissions Reporting Requirements (AERR) rule
- 2023 Emissions Inventory Guidelines updates

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## **General El Applicability**

- In general, the following sources are required to submit an annual point source EI:
  - Major sources under 30 Texas Administrative Code (TAC) Chapter 116
  - Major sources under 30 TAC Chapter 122
  - Any stationary source that emits or has the potential-to-emit (PTE) 100 tons per year (tpy) or more of any regulated pollutant
    - Does not include greenhouse gases as defined in 30 TAC Section 101.1

### **General El Applicability (cont.)**

- Any stationary source that emits or has the PTE 10 tpy or more of any single hazardous air pollutant (HAP) or 25 tpy or more of aggregate HAPs as defined in the federal Clean Air Act, Section 112(a)(1)
- Any stationary source that emits 0.5 tpy of lead (Pb) or more or has the PTE of 10 tpy of Pb or more
- Any stationary source that emits 10 tpy or more of volatile organic compounds (VOC) or 25 tpy or more of nitrogen oxides (NO<sub>X</sub>) in an ozone nonattainment area

### **General El Applicability (cont.)**

- Any source subject to a Texas Commission on Environmental Quality (TCEQ) special inventory
- Major source threshold subject to change if source is located in an area designated as nonattainment for a NAAQS
  - Example: A serious nonattainment area under an ozone NAAQS is reclassified as severe nonattainment for the same NAAQS.
  - For this example, the major source threshold would change from 50 tpy (serious) to 25 tpy (severe) of either actual or potential VOC or NO<sub>X</sub> emissions.

#### **2015 Ozone NAAQS Updates**

- On October 7, 2022, EPA published a final redesignation of the Dallas-Fort Worth (DFW), Houston-Galveston-Brazoria (HGB), and Bexar County 2015 Ozone NAAQS nonattainment areas to moderate nonattainment.
- On October 12, 2023, Governor Abbott signed and submitted a letter to EPA to reclassify these three 2015 ozone standard moderate nonattainment areas to serious.
- EPA action on the State's request is still pending.



### 2015 Ozone NAAQS Updates (cont.)

- EPA expanded the boundary of the existing Sunland Park, New Mexico 2015 ozone marginal nonattainment area to include El Paso County in 2021.
- On June 30, 2023, the United States Court of Appeals for the District of Columbia Circuit reversed the EPA's nonattainment designation for El Paso County.
- For calendar year 2023, El Paso County is included in the TCEQ special inventory for stationary sources that emit ozone precursors.



#### **Calendar Year 2023 Point Source El Applicability**

	Summary of Reporting Requirements (tpy) for 30 TAC Section 101.10											
	Note: For ozone nonattainment areas, the more stringent classification (where applicable) is used to determine reporting requirements for ozone											
		precursor potential emissions.										
	County	VOC		NOx		Other		Individual HAP		Aggregated HAP		
	CLASSIFICATION/POLLUTANT	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	
El Paso County added to specia	Collin, Dallas, Denton, Ellis, son, Kaufman, Parker, kwall, Tarrant, Wise SEVERE/OZONE	10	25	25	25	100	100	10	10	25	25	
for ozone precu	rsors Bexar MODERATE/OZONE	10	100	25	100	100	100	10	10	25	25	
(	See county listing** SPECIAL INVENTORY REPORTING THRESHOLDS FOR OZONE PRECURSOPS	10	100	25	100	100	100	10	10	25	25	
	An other Counties	100	100	100	100	100	100	10	10	25	25	
	Statewide Lead (Pb) Actual						Lead (Pb) Potential					
	REPORTING THRESHOLDS FOR LEAD (ALL COUNTIES) 0.5						10					
	MISSION ON NTAL QUALITY Air Quality	rce Emis	ce Emissions Inventory - What's New • MFM • January 26, 2024						8			

### **PM NAAQS Updates**

- On January 27, 2023, EPA published a reconsideration of the PM NAAQS that proposed to:
  - Revise the annual standard for  $PM_{2.5}$  from the current level of 12.0 micrograms per cubic meter (µg/m³) to a range of 9.0 to 10.0 µg/m³

EPA took comment on levels from 8.0 to 11.0  $\mu$ g/m<sup>3</sup>

- Retain the 24-hour standard for  $PM_{2.5}$  at 35  $\mu g/m^3$  EPA took comment on alternate level as low as 25  $\mu g/m^3$
- Retain the secondary  $PM_{2.5}$  standard
- Retain the primary PM<sub>10</sub> 24-hour standard
- EPA is anticipated to finalize the PM NAAQS in early 2024.

#### **PM NAAQS: Potentially Affected Counties**



### **PM NAAQS Updates: El Impact**

- Timing: nonattainment area designations likely in 2026
- Major source thresholds for nonattainment areas:
  - Moderate 100 tpy of  $PM_{2.5}$ , sulfur dioxide (SO<sub>2</sub>), NO<sub>X</sub>, VOC, ammonia
  - Serious 70 tpy of  $PM_{2.5}$ ,  $SO_2$ ,  $NO_X$ , VOC, ammonia
- Initial nonattainment classification for all areas: moderate
- Reclassification to serious nonattainment if an area fails to attain by the attainment date

#### **PM NAAQS Updates: Resources**

• Federal Register notice:

https://www.govinfo.gov/content/pkg/FR-2023-01-27/pdf/2023-00269.pdf

 March 3, 2023, presentation from PM<sub>2.5</sub> NAAQS Revision Meeting for Houston and Southeast Texas: <u>https://www.tceq.texas.gov/downloads/air-</u> <u>quality/sip/pm/designations/naaqs-pm25-2012/pm-</u> <u>naaqs-revision-meeting\_houstonsetx\_final.pptx/view</u>



#### **AERR Updates**

- EPA proposed AERR revisions on August 9, 2023.
- The AERR is the basis for the state implementation plan Els.
- Proposed updates to point source EI reporting are extensive and include (not a complete list):
  - New requirements for HAP reporting would apply to point, portable, and specific area sources.
    - Would require specific area sources and portable facilities, including drilling rigs, to submit a point source emissions inventory if HAP reporting thresholds were met.
    - Proposed site-level specific thresholds for over 140 HAPs are more stringent than current TCEQ point source EI requirements.

## **AERR Updates (cont.)**

- Proposed point source El updates (not a complete list), (cont.):
  - EPA would continuously update the HAP emissions thresholds for point source reporting as new risk information becomes available.
  - Sites may have to report HAP emissions directly to EPA using the Combined Air Emissions Reporting System.
  - Emissions from a stationary site's mobile sources would be required to be reported in the point source inventory.

### **AERR Updates (cont.)**

- Proposed point source EI updates (not a complete list), (cont.):
  - Emissions from emissions events and maintenance, start-up, and shutdown events would be required to be reported, potentially at the event level.
  - Sites would have to report Title V permit number and all federally enforceable regulations.
  - The proposal would accelerate the timeline for states to submit EI data to EPA.
    - This may necessitate changes to state's EI reporting deadlines.

### **AERR Updates (cont.)**

- Timing of the rule:
  - Comment period ended November 17, 2023.
  - EPA expects to promulgate the final rule prior to December 2024.
- Point source EI reporting changes could be required as soon as the 2026 EI reporting year.



#### **AERR Updates: Resources**

- EPA AERR page
  - <u>https://www.epa.gov/air-emissions-inventories/air-emissions-reporting-requirements-aerr</u>
- Federal Register notice
  - <u>https://www.govinfo.gov/content/pkg/FR-2023-08-09/pdf/2023-16158.pdf</u>



#### 2023 Emissions Inventory Guidelines Updates

Sources added to the guidance:

- pneumatics
- malfunctioning scrubber dump valves
- malfunctioning or open thief hatches on tanks with vapor recovery units



**Types of Pneumatic Valves** 

https://engineeringlearn.com





### **Contact Information**

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- Point Source El webpage:
  - www.tceq.texas.gov/goto/ieas



### **Questions?**



# **Frequently Seen Emissions Inventory Reporting Issues**

#### Overview

- Submitting emissions inventory (EI) supporting documentation
- Sample calculations
- Emissions events (EE) and scheduled maintenance, startup, and shutdown (SMSS) emissions reporting
- Speciating volatile organic compounds (VOC) emissions
- Determining VOC emissions from internal combustion engines and speciation example

# Attaching Supporting Documentation in STEERS-AEIR

- Sites commonly do not complete the process to attach El supporting documentation in the State of Texas Electronic Emissions Reporting System (STEERS).
- The "Attach" button must be pressed after selecting the supporting documents, as shown in the image below:

pporting Document(s): Please limit files to 30 MB in s vsing to and choosing a file click the attach button. circumstances should CONFIDENTIAL information b	lize. e attached
Choose File No file chosen	
Attach	
	pporting Document(s): Please limit files to 30 MB in straining to and choosing a file click the attach button.   circumstances should CONFIDENTIAL information bial information should be mailed separately.   Choose File No file chosen   Attach Sample Calculations xisx   (clicking on a link above will open a powe window)

# Reminder: Submitting Confidential Supporting Documents

- Do NOT submit confidential data through STEERS.
- Confidential data should only be submitted using one of these two methods:
  - digitally, through the Texas Commission on Environmental Quality (TCEQ) secure file transfer protocol (FTP) site; or
  - physically, using a mail or courier service.
- Security cannot be ensured for confidential data submitted by other means.

# Reminder: Submitting Confidential Supporting Documents (cont.)

- Please clearly mark all confidential data.
- TCEQ holds data confidential as requested in accordance with agency policy and rules (see 30 Texas Administrative Code [TAC] Section 1.5).
  - Exception: If the Texas Attorney General's Office rules or a court issues a ruling that the data are not protected by state law, then confidential data may be released.

# What Should be Included in Supporting Documentation

- Sample calculations
- Summary of stack test results
- Summary of relative accuracy test audit reports
- System audit (e.g., cylinder gas audit) for continuous emissions monitoring systems
- Predictive emissions monitoring systems data
- Material throughput information

# Supporting Documents: Sample Calculations

- For several sources of the same type and a single calculation methodology:
  - 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.
    - Example: heat inputs for combustion sources or throughputs for storage tanks

### **Reporting EE Data in the El**

- EE is defined in 30 TAC Subsection 101.1(28) as:
  - an upset event or unscheduled maintenance, startup, or shutdown activity that results in unauthorized emissions.
- Information required to accurately report EE in the EI includes:
  - The total number of reportable and non-reportable EEs.
    - **Reportable EE** is defined as any EE that, in any 24-hour period, resulted in unauthorized emissions equal to or in excess of the reportable quantity (RQ) for any individual air contaminant.
    - These events should have been reported previously to the TCEQ as required by 30 TAC Section 101.201.

# Reporting EE Data in the EI (cont.)

- Information required to accurately report EE in the EI includes:
  - The total number of reportable and non-reportable EE (cont.).
    - Non-reportable EE: any EE that resulted in unauthorized emissions less than the RQ for any individual air contaminant.
  - Path-level emission totals of individual contaminants in units of tons per year.

## **Reporting SMSS Data in the EI**

- SMSS activities are defined in 30 TAC Section 101.1(91).
- Information required to accurately report SMSS activities in the EI includes:
  - The total number of reportable and non-reportable SMSS activities.
    - Reportable SMSS: any SMSS activity for which prior notice was provided that resulted in unauthorized emissions that equaled or exceeded an RQ.
      - A final report for these events should have been submitted to the TCEQ as required by 30 TAC Section 101.211.

## SMSS Data in the El (cont.)

- Information required to accurately report SMSS activities in the EI includes:
  - The total number of reportable and non-reportable SMSS activities (cont.).
    - Non-reportable SMSS: any SMSS activity that did not result in emissions exceeding an RQ and was recorded as required by 30 TAC Section 101.211.
  - Exception: Do <u>NOT</u> include the number of events from MSS activities that are **authorized** by a permit or permit by rule.
    - When authorized, these activities are considered routine operations.
  - Path-level emission totals of individual contaminants in units of tons per year.

#### **Categorizing MSS Activities**



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# Permitted MSS Emissions Reporting in the El





#### **Reporting Emissions Related to Excess Opacity Events in the El**

• Quantify and report the emissions that occurred during the excess opacity event.

• Report the emissions at the path level under the appropriate emissions category.

#### **VOC Speciation**

- VOC speciation criteria are based on geographic location.
  - If a site is located in El Paso county or is east of 100° longitude line, speciate non-combustion sources that emit at least 5 tons per year (tpy).
  - For all other sites, speciate non-combustion sources that emit at least 25 tpy.
- Speciation means identifying and quantifying individual chemical emissions to at least 90%.
  - Emissions under 0.1 tpy may be grouped under VOC-unclassified.
- VOC speciation requirements are distinct from hazardous air pollutants speciation requirements.

#### **VOC Speciation (cont.)**


### **VOC Speciation (cont.)**

- Speciating VOC emissions to 90% for combustion sources is often not possible.
- Hazardous air pollutants (HAP) ≥ 0.1 tons per year (tpy) must be reported from all sources, including combustion sources.
- Special speciation requirements apply to lead compounds and HAPs listed in any TCEQ-enforceable document such as a permit, regulation, or commission order.

#### VOC Emissions from Internal Combustion Engines

- Common methods for determining VOC emissions are found below in order of preference (list is not comprehensive):
  - M (measured: stack test data)
  - V (vendor-supplied emissions factor based on manufacturer's tests)
  - A (United States Environmental Protection Agency's [EPA] Compilation of Air Pollutant Emissions Factors [AP-42] or other EPA-approved factor)
- Only use the AP-42 VOC factor to calculate total VOC emissions when no better method (e.g., stack test, vendor data) is available.

#### VOC Emissions from Internal Combustion Engines (cont.)

- For stack tests and vendor data, ensure that emissions factors are derived from tests that measured VOC instead of total hydrocarbon emissions.
- For vendor data:
  - Verify whether the vendor's emission factor accounts for formaldehyde and other aldehyde compounds.
  - If the factor excludes all aldehyde compounds, please contact the EAS.

### **VOC Speciation: Internal Combustion Engines**

- If available, source-specific information must be used when determining speciated VOC emissions.
- If no source-specific information about the VOC composition exists, VOC emissions must be speciated using AP-42 "trace organic compounds" emission factors.
- This approach can be used with a total VOC emissions factor obtained from stack-test data or vendor data.

### **VOC Speciation: Internal Combustion Engines (cont.)**

- To speciate VOC emissions with a stack test or vendor total VOC emissions factor, follow these steps:
  - Locate AP-42 "Trace Organic Compound" emissions factors rated "C" or better (i.e., "A", "B", or "C").
  - Divide each AP-42 trace organic factor by the AP-42 VOC emissions factor to obtain contaminant speciation ratios.
  - Multiply the total VOC emissions by each speciation ratio to obtain speciated compound emissions.
  - Code speciated emissions as S for scientifically calculated.
  - Report remainder VOC as VOC-unclassified (50001) and code as either M for stack test or V for vendor data.

## **VOC Speciation: Engine Example**

- **Example:** Speciate 1.2 tpy of VOC emissions for a 4-cycle lean burn (4CLB) engine when using a vendor total VOC vendor factor.
  - Formaldehyde is rated "A" for a 4CLB.
  - Determine the contaminant speciation ratio for formaldehyde.  $\frac{0.0528 \text{ lb/MMBtu}}{0.118 \text{ lb/MMBtu}} = 0.447$
  - Multiply the total VOC emissions by the speciation ratio.
    - 1.2 tpy of VOC  $\times$  0.447 = 0.536 tpy of formaldehyde (coded S)
  - No other HAP emissions meet the 0.1 tpy reporting threshold.
  - Calculate the remaining VOC.

1.2 tpy of VOC – 0.536 tpy = 0.664 tpy of VOC-unclassified (coded V)

## **VOC Speciation: Engine Example (cont.)**

- Previous example is for a vendor-supplied VOC emission factor that includes formaldehyde.
- More complicated scenarios exist when a stack test or vendor formaldehyde factor is provided and/or the VOC emissions factor excludes formaldehyde.
- Specific VOC speciation guidance can be found in "Technical Supplement 1: Selected Combustion Sources" of the Emissions Inventory Guidelines.

### Mailing Supporting Documents and Confidential Information

• Send correspondence via the USPS (e.g., overnight mail, priority mail, certified mail) to:

Emissions Inventory Data, MC 166 Texas Commission on Environmental Quality P.O. Box 13087 Austin, TX 78711-3087

 To send mail to a particular Emissions Assessment Staff (EAS) member, use the appropriate address from above, replacing Emissions Inventory Data, MC 166 with [staff member's name], MC 164.

### Mailing Supporting Documents and Confidential Information (cont.)

 Send correspondence via special overnight carrier (e.g., FedEx, UPS) to:

Emissions Inventory Data, MC 166 Texas Commission on Environmental Quality 12100 Park 35 Circle, Bldg. E., 3rd Floor Austin, TX 78753

 To send overnight correspondence to a particular EAS staff member, use the appropriate address from above, replacing Emissions Inventory Data, MC 166 with [staff member's name], MC 164.

### **Contact Information**

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- Point Source El webpage:
  - www.tceq.texas.gov/goto/ieas



### **Questions?**



# Particulate Matter (PM) Emissions Inventory Reporting

#### **Overview**

- PM definition: filterable plus condensable
- Total PM,  $PM_{10}$ , and  $PM_{2.5}$
- Emission inventory (EI) guidance
- Overview of methods for common PM sources and example PM emissions calculations
- Common EI reporting issues



#### **Size Comparison for PM particles**

Particulate Matter (PM) Basics | US EPA

Particles <10 microns can affect lungs and heart





#### **PM: Official Definition**

30 Texas Administrative Code Section 101.1 (76) defines PM emissions as: "All finely-divided solid or liquid material, other than uncombined water, emitted to the ambient air as measured by United States Environmental Protection Agency (EPA) Reference Method 5, as specified at 40 Code of Federal Regulations (CFR) Part 60, Appendix A, modified to include particulate caught by an impinger train; by an equivalent or alternative method, as specified at 40 CFR Part 51; or by a test method specified in an approved state implementation plan."



#### **PM: Front-Half and Back-Half Components**











Air Quality Division • Particulate Matter (PM) Emissions Calculations • MDV • January 25, 2024

#### **PM: Filterable and Condensable**

- What does the definition mean for EI reporting?
  - Both the filterable (front-half) and condensable (back-half) emissions must be summed and reported as Total PM,  $PM_{10}$ , and  $PM_{2.5}$  emissions.
  - If condensable emissions were not tested, then an alternative method must be used to determine condensable PM emissions.
- Specific Total PM, PM<sub>10</sub>, and PM<sub>2.5</sub> reporting guidance is available in the 2023 Emissions Inventory Guidelines:
  - Chapter 4, "Determining and Reporting Emissions"
  - Technical Supplement 1, "Selected Combustion Sources"
  - Technical Supplement 2, "Cooling Towers"

# Total PM, PM<sub>10</sub>, and PM<sub>2.5</sub>



- Total PM is PM filterable (front-half) + PM condensable (back-half).
- $PM_{10}$  is a subset of Total PM.
  - Most PM is composed of a certain percentage of  $PM_{10}$ .
- $PM_{2.5}$  is subset of Total PM and  $PM_{10}$ .
- PM<sub>10</sub> and PM<sub>2.5</sub> are subsets of Total PM, so reporting each of the PM subsets in the EI does not result in triple counting of PM emissions.

### **Emissions Determination Methods**

- Common determination methods for PM emissions are listed in order of preference below (list is not comprehensive):
  - M (measured: stack test data)
  - V (vendor-supplied emissions factor)
  - A (EPA's Compilation of Air Pollutant Emissions Factors [AP-42] or other EPA- or Texas Commission on Environmental Quality [TCEQ]-approved factor)
- Use a more preferred method when available:
  - Stack test data instead of vendor emissions factors
  - Vendor emissions factors instead of AP-42 emissions factors

### PM, Natural Gas Combustion, and AP-42

- For natural gas combustion, all particulate matter is less than one micron in diameter, so  $PM_{2.5} = PM_{10} = Total PM$ .
- Use a Total PM emissions factor to determine Total PM,  $PM_{10}$ , and  $PM_{2.5}$  emissions.
  - For natural gas-fired combustion engines/turbines using AP-42, sum the filterable and condensable emissions factors in Section 3.1, 3.2, or 3.3 to determine a Total PM emissions factor.
  - For external combustion sources such as boilers, heaters, or thermal oxidizers, AP-42, Section 1.4 already sums the filterable and condensable factors to provide a Total PM emissions factor.
- Report the resulting emissions under each PM contaminant code:  $PM_{2.5}$  (39999),  $PM_{10}$  (20000), and Total PM (10000).

### **Natural-Gas Fired Engines**

- Example: Determine PM emissions from a 4-cycle rich burn (4CRB) engine using the following AP-42, Section 3.2 emissions factors (method code A):
  - PM (condensable) = 0.00991 lb/MMBtu
  - PM<sub>10</sub> (filterable) = 0.0095 lb/MMBtu
  - $PM_{2.5}$  (filterable) = 0.0095 lb/MMBtu
- Add the PM condensable factor to the  $PM_{10}$  filterable and  $PM_{2.5}$  filterable factors to obtain a cumulative factor.
  - 0.00991 lb/MMBtu + 0.0095 lb/MMBtu = 0.01941 lb/MMBtu
  - 0.01941 lb/MMBtu will be the emissions factor used to determine Total PM,  $PM_{10}$ , and  $PM_{2.5}$  from the 4CRB engine.

Ib/MMBtu = pounds/one million British thermal units

## **Rotary Kilns: Asphalt/Cement Sites**

- Rotary kiln example calculation:
  - Total PM emissions from stack test factor
  - Method M for measured Total PM, single-year stack test data
  - Stack test dated 2/17/2023 with 0.34 lb/ton Total PM
  - 500,000 ton of dry feed/year referenced in supporting documentation

Total PM = 
$$0.34 \frac{lb PM}{ton} * 500,000 tons \frac{feed}{year} = 170,000 \frac{lb PM}{year}$$
  
170,000  $lb \frac{PM}{year} / 2000 \frac{lb}{ton} = 85 tpy$ 

Send a copy of stack test summary page(s) with the EI submittal.

### Rotary Kilns: Asphalt/Cement Sites (cont.)

- If no stack test or more preferred data exists, determine  $PM_{10}$  and  $PM_{2.5}$  emissions using AP-42, Table 11.20-6 percentages.
  - Example for rotary kiln with scrubber: 50% for  $PM_{10}$  and 35% for  $PM_{2.5}$  respectively.
  - Report determination method as S for scientifically calculated since the method combines stack test and AP-42 data.
- Clearly label each source (Kiln 2) and reference for factors (stack test, AP-42 Table 11.20-6 for Rotary Kiln with scrubber %) in supporting documentation.

FIN	EPN	Method	Contam Code	Contaminant	ANNUAL Ton/Year	OZONE Pound/Day
Kiln	2	Μ	10000	PART-U	85 tpy	465.8
Kiln	2	S	20000	PM10 PART-U	42.5	232.9
Kiln	2	S	39999	TOTAL PM2.5 PARTICULATE	29.75	163



#### Rotary Kilns: Asphalt/Cement Sites (cont.)

- Remember to speciate mercury and other hazardous air pollutants above EI reporting guidelines using AP-42 percentages or ratios.
- Road emissions are also expected at asphalt and cement sites.
- For road emissions, material handling, and aggregate storage piles,  $PM_{2.5}$  is expected to be reported as a percentage of Total PM and  $PM_{10}$ .

### Landfills

- Report PM emissions from all applicable sources.
- Combustion devices: use guidance in *Emissions* Inventory Guidelines.
  - Technical Supplement 1: Selected Combustion Sources
    Technical Supplement 4: Flares
- Paved and unpaved roads: use emissions factors and guidance in AP-42, Section 13.2.
  - List controls (such as watering roads) with efficiency percentages by source in supporting documents.



# Landfills (cont.)

- Operation equipment, such as bulldozer or grader: use emissions factors in AP-42, Section 11.9.
  - Factors are available by ranges and particle size.
- Recycling operations: account for any PM emissions from crushing, shredding, or grinding.
  - Use vendor data, industry data, or AP-42 data to determine emissions if monitoring or measurement data is not available.



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## Dryers

- PM emissions will result from fuel combusted.
- PM emissions may also result from promoted material being dried.
- When two methodologies are used, majority of emissions determine method reported.



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## Baghouses

- Baghouses may be present on a variety of different emissions sources.
- Baghouses are control devices that remove particle matter from a gas stream by depositing it on a filter.
  - Filters are usually cylindrical fabric bags.
  - Cartridges that are constructed of sintered metal or porous ceramic may be also be used as filtering media.
- In general, fabric filters are capable of collection efficiencies greater than 99%.
  - If using an emissions factor less than 0.01 grains per standard cubic feet, vendor data should be provided as verification in EI supporting documentation.



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# **Cooling Towers**

- Water droplets drift from cooling towers and result in PM emissions.
  - Note: drift eliminators reduce but do not prevent drift.
- Common PM emissions determination methods include:
  - Vendor data
  - AP-42



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# **Cooling Towers (cont.)**

- El determination method for PM emissions will depend on how the percentage total dissolved solids in the cooling water is calculated.
  - Vendor drift factor use method code V.
  - Site-specific total dissolved solids use method code A.
  - Size distribution algorithm use method code S.
  - AP-42 Section 13.4 default value use method code A.
- AP-42 does not include factors for  $PM_{2.5}$  emissions.
- Use the best available site-specific data and process knowledge to determine  $PM_{2.5}$  emissions.



# **Common El Reporting Issues**

- Missing PM emissions
  - If emissions are below EI guidance reporting thresholds, submit this explanation in the supporting documentation.
- Reporting Total PM but not  $PM_{10}$  and  $PM_{2.5}$ 
  - The size of PM emissions is important.
  - Reporting  $PM_{10}$  and  $PM_{2.5}$  indicates size distribution of PM emissions.
- Total PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions not equal at natural gas combustion sources
  - Remember: for natural gas combustion, all particulate matter is less than one micron in diameter, so  $PM_{2.5} = PM_{10}$  = Total PM.

#### Resources

- Point source EI webpage: <u>www.tceq.texas.gov/goto/ieas</u>
- 2023 Emissions Inventory Guidelines (RG-360/23) references:
  - Chapter 4, "Determining and Reporting Emissions"
  - Technical Supplement 1, "Selected Combustion Sources"
  - Technical Supplement 2, "Cooling Towers"
- EPA webpages: <u>AP-42: Compilation of Air Emissions</u> <u>Factors | US EPA, Monitoring by Control Technique - Fabric</u> <u>Filters | US EPA, and Particulate Matter (PM) Basics | US</u> <u>EPA</u>



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  - psinvent@tceq.texas.gov





### **Questions?**



#### Web-Emissions Inventory Reporting: State of Texas Environmental Electronic Reporting System
#### Overview

- State of Texas Environmental Electronic Reporting System (STEERS)
- STEERS account
  - Creating and updating an account
  - Program access: levels of authority
  - STEERS Participation Agreement (SPA) form
- Web-based emissions inventory (Web-EI)
  - Reporting options
  - Basic process
- Common questions and items to note



#### Web-El YouTube Videos

- Nine YouTube videos on the STEERS Web-EI reporting process
  - STEERS basics
  - Web-EI details
- Link to videos available on point source El web page: <u>https://www.tceq.texas.gov/airquality/point-source-ei/psei.html</u>



#### What is STEERS?

- Portal for accessing various Texas Commission on Environmental Quality (TCEQ) online reporting programs
  - Air New Source Review registrations
  - Emissions banking and trading
  - Pesticide general permits
  - Annual Emissions Inventory Reporting (AEIR) System (aka "Web-EI")
- Manages user accounts
  - Controls access to reporting programs
  - Sets and maintains security functions

## **Creating/Updating a STEERS Account**

- STEERS accounts are user-based.
  - The accounts are assigned to individuals.
  - ER###### is the format of STEERS account numbers.
  - Don't confuse a STEERS account number with an air account number or regulated entity reference number (RN).
- Each person should have their own STEERS account. Do not share STEERS accounts.







- >> Annual Emissions Inventory Report (AEIR)
- >> Air Emissions & Maintenance Events (AEME) Reporting
- >> Emissions Banking and Trading (EBT)
- >> Industrial & Hazardous Waste (IHW) NOR and Summaries
- >> Municipal Solid Waste (MSW) Reporting
- >> Pollution Prevention Planning (P2PLAN) Reporting
- >> Public Drinking Water (PDW)
- >> Training Roster Online Submittal (TROLS)

See details of what you can do.

This is STEERS version 6.1.

We do our best to ensure that STEERS is online when you need it. But for upgrades, security measures, and other maintenance, we must bring STEERS or one of its modules offline. We cannot predict emergency outages, but for scheduled downtimes, see our STEERS maintenance schedule.

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# Creating/Updating a STEERS Account (cont.)

- Select and provide answers to several security questions. The questions will be used later during STEERS login for security and user verification.
- Configure program access during account creation.
   For Web-EI reporting, "AEIR" is the official STEERS program name.
- Contact TCEQ STEERS staff with issues on this portion of STEERS.
  - <u>STEERS@tceq.texas.gov</u>
  - (512) 239-6925





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# Creating/Updating a STEERS Account (cont.)

Read onscreen prompts carefully

Especially for access type and authorization

- Select proper access type for appropriate level of authority
  - Read: view data only
  - Edit: enter and edit data within STEERS
  - Submit: certify and submit data to the TCEQ
- Complete authorization
  - Yourself: self-authorization
  - Another person: requires another individual to verify
- Add RNs or air account numbers

# **Program Access - Levels of Authority VERY IMPORTANT**

- Third-party consultants cannot have submit authority. Per 30 Texas Administrative Code Section 101.10(d), the owner or operator of a site must certify the EI data.
- Submit authority should be limited to:
  - for Title V sites, the
    - Responsible Official or the
    - Designated Representative or the
    - Alternate Designated Representative; or
  - for non-Title V sites, the managers or personnel with authority to represent the company or facility.

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Other						
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### **STEERS Participation Agreement**

- Document signed by each STEERS user
  - Paper signature
  - Electronic signature using valid Texas driver license
- Certifies that users understand and agree to all rules and requirements of STEERS
- Must be submitted for:
  - New STEERS accounts
  - Existing STEERS accounts when updating or adding new access
- New accounts and changes to an account are on probation until SPA submitted



#### Common Questions and Items to Note: STEERS

- Who should have AEIR access?
  - Read or Edit access is appropriate for anyone designated by the company to view or prepare EI data (including consultants).
  - Submit authority for Title V sites is restricted to ROs, DRs, or ADRs ONLY.
  - Submit authority for non-Title V sites can be any company official but not a consultant.
- Why can't I access the AEIR system?
  - Check the "STEERS Access" section under "My Account."
  - Is anything listed as on "Probation"?
- Submitting a new SPA may address many issues.

#### Preparing a Web-EI Using the STEERS AEIR System

- There are two reporting options:
  - Emissions Inventory Questionnaire (EIQ) Entry manual update option, and
  - File Import

single text file import method.

- Insignificant emissions change and inapplicability notification letters cannot be submitted through STEERS.
  - Hard-copy letters with wet-ink signatures are required to be mailed.
  - Contact the Emissions Assessment Section (EAS) if there are challenges with mailing signed letters.



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Days Per Week	7	* 7
Weeks Per Year	52	* 52
Annual Operating Hours	8	* 8
Spring Percentage	25	* 25
Summer Percentage	25	* 25
Fall Percentage	25	* 25
Winter Percentage	25	* 25
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Percent Maximum Capacity	1	* 1
Start Time	0	* 0
Firing Type	ОТ	* OT - OTHER •
2 or 4 Cycle (CYCLE)	4	* 4 •
Burn Type	RICH	* RICH - RICH BURN ENGINE <b>•</b>
Engine Rating (HP)	300	* 300
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Phone:	512-239-5	5155							
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## **Submitting El Data**

- The Web-EI submittal process starts at the AEIR work area (WA).
  - File Upload: users can only access the WA once an error-free file is imported.
  - EIQ Entry: users can access the WA at anytime.
    - Error messages are displayed for incomplete entry or other errors.
- Emissions totals are displayed once EI data is error free.
- Sample calculations and other supporting documents can be attached here.
- All users can access these portions of the WA.

# Submitting El Data (cont.)

- Only a user with submit authority may select one of two statements required regarding emissions events.
  - The selection must be completed just prior to submission.
  - The statement cannot be selected in advance and saved.
- Only a user with submit authority may click "Submit" and confirm submittal.
- The portion of the WA described above can only be completed by a user with submit authority.



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VOC	VOLATILE	ORGANIC COMPOUND EMISSIONS	13.6700	64.9000	9.5000	0.0000
CO	CARBON	IONOXIDE EMISSIONS	3.2000	0.0000	0.0000	0.0000
NOX	OXIDES O	F NITROGEN EMISSIONS	6.1000	0.0000	0.0000	0.0000
SO2	SULFUR D	IOXIDE EMISSIONS	0.5000	0.0000	0.0000	0.0000
PB	LEAD EMIS	SSIONS	0.0000	0.0000	0.0000	0.0000
PM10	PM10 EMIS	SSIONS	1.5001	0.0000	0.0000	0.0000
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Class Name		Annual (TPY)	Ozone (PPD)	SMSS (TPY)	EE (TPY)
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VOC VOLATILE	ORGANIC COMPOUND EMISSIONS	13.6700	64.9000	9.5000	0.0000
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NOX OXIDES OF	F NITROGEN EMISSIONS	6.1000	0.0000	0.0000	0.0000
SO2 SULFUR D	IOXIDE EMISSIONS	0.5000	0.0000	0.0000	0.0000
PB LEAD EMIS	SIONS	0.0000	0.0000	0.0000	0.0000
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#### **Note on Confidential Information**

- Do not attach confidential information to STEERS.
- Do not email confidential information.
- Submit confidential information through the secure File Transfer Protocol (FTPS) web page, mail, or hand deliver.
- EAS prefers that confidential information is securely transmitted through the TCEQ FTPS web page <u>https://ftps.tceq.texas.gov/</u>
  - Upload and share with <a href="mailto:psdocument@tceq.texas.gov">psdocument@tceq.texas.gov</a>.
  - Please contact the EAS helpline if you need assistance.


#### What Happens After Submittal

• The submitted EI is queued for processing by the State of Texas Air Reporting System (STARS).

Processing occurs daily at 6 PM.

- All AEIR users associated with the RN will receive an email after the following steps:
  - Submission: The email confirms the EI was submitted.
  - STARS processing:
    - If the email states "RECEIVED", the submittal was received without errors.
    - If the email states "FAILED", then contact the EAS.



#### Common Questions and Items to Note: Web-EI

- Access issues
  - Check the "My Account" section in STEERS
    - Items on probation
    - Missing program area access
    - Specific RN(s) not part of program area access
  - May need to update user account or submit a SPA
- Web-EI issues: may need to contact EAS
  - Missing options
  - Portions not accessible
  - Unknown errors



# **Reporting Coming Soon**

- A STEERS-based reporting system for the air emissions and inspection fee program is currently being developed.
- The new program will be called the Air Emissions and Inspection Fee (AEIF) reporting program.
  - The STEERS fees AEIF program will be separate from the EI program, AEIR.
- A few changes to the current air fees e-mail notification process will occur.



## Notification Process for Fiscal Year (FY) 2025 Fee Reporting Cycle

- Same as current process: e-mail based
  - Simplified e-mail with no attachment
- Link provided to download air fee basis forms
  - PDF format
  - Form can be updated and submitted electronically
- E-mail completed form to <u>airfees@tceq.texas.gov</u>



#### Submission Process for FY25 Air Fees Reporting Cycle and Beyond

- All companies will still e-mail completed air fee basis form for FY25.
- The STEERS-AEIF program should be completed by April 2024.
- EAS may request a few companies to volunteer to test STEERS-AEIF.
- EAS is anticipating a transition period for fee form submittal, with full adoption by FY27.
  - STEERS-AEIF will be similar to the air fee basis form.
  - The AEIF program will step the user through each section of the form.
  - The AEIF program will adhere to STEERS security standards.
    - Users will need STEERS account with appropriate authority, similar to AEIR.

# **Contact Information**

- EAS helpline: Monday-Friday, 8 AM to 5 PM
  - (512) 239-1773
  - psinvent@tceq.texas.gov
- STEERS (non web-EI questions):
  - steers@tceq.texas.gov
  - (512) 239-6925
- Adam Bullock, Technical Specialist
  <u>adam.bullock@tceq.texas.gov</u>
- Tim Vinciguerra, Ph.D., Emissions Inventory Specialist
  <u>tim.vinciguerra@tceq.texas.gov</u>





## **Questions?**