



Overview of Emissions Inventories

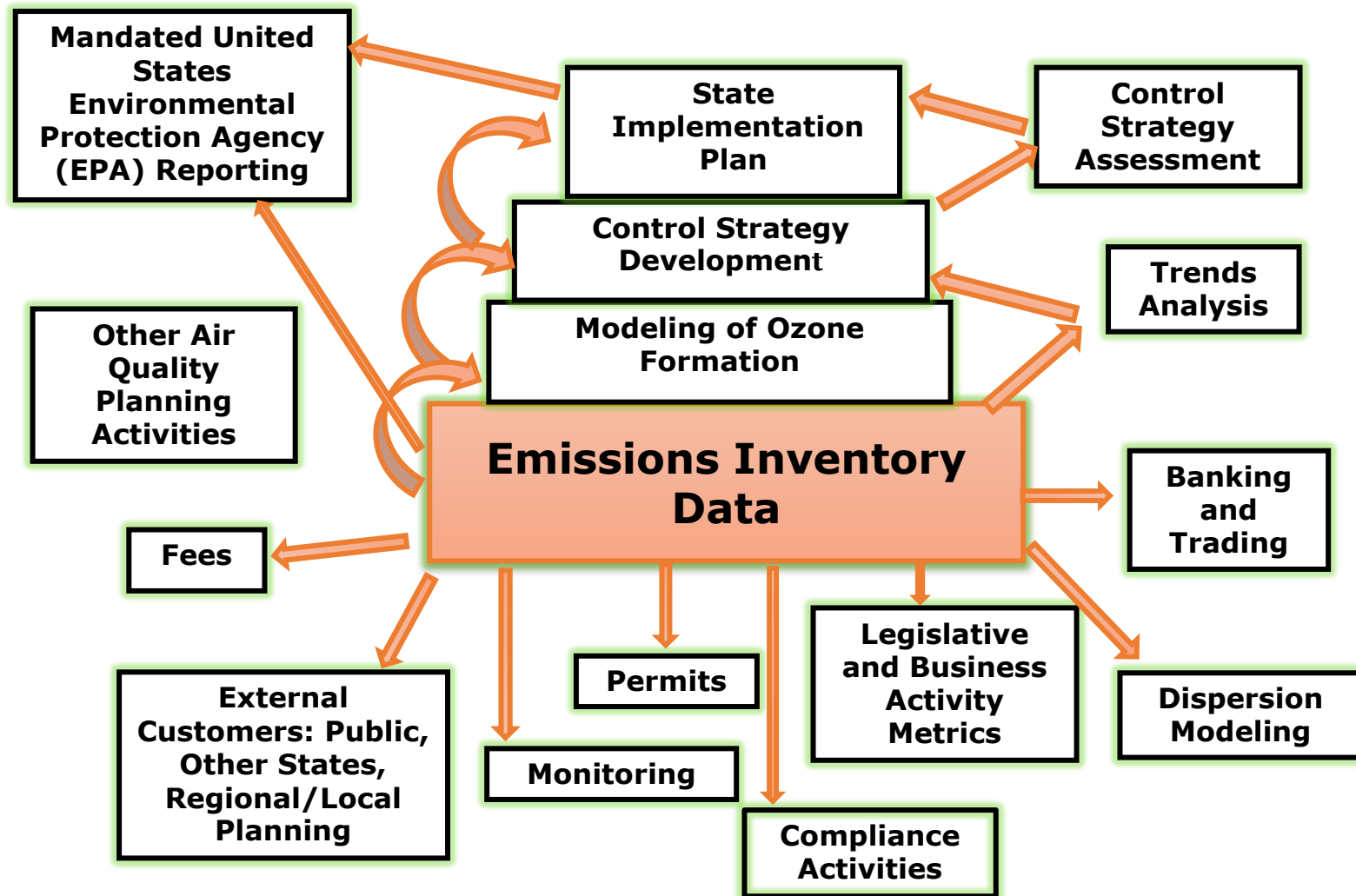
Overview

- What is an emissions inventory (EI)?
- How is EI data used?
- Applicability requirements
 - Recent El Paso County update
- Types of EIs
- Information to include in the EI
- Hazardous air pollutants (HAPs)
- Emissions banking and trading (EBT) and the EI
- What's new for reporting year (RY) 2021

What is an EI?

- Accounts for the amount of air pollutants released into the atmosphere
- Includes the following data:
 - Who: Sources creating air pollution
 - What: Chemical or physical identity of the pollutants
 - Where: Geographic area covered
 - When: Time period emissions are released
 - Why: Types of activities that cause emissions
 - How: Specific release information
 - Location
 - Height
 - Velocity
 - Temperature

How Does the Texas Commission on Environmental Quality (TCEQ) Use the EI?



30 Texas Administrative Code (TAC) Section 101.10

- Rule organization:
 - (a) Applicability
 - (b) Types of inventories
 - (c) Calculations
 - (d) Certifying statements
 - (e) Reporting requirements
 - (f) Enforcement

Applicability Requirements: Who Needs to Submit an EI?

- What information is needed to determine if a site meets the reporting requirements of 30 TAC Section 101.10?
 - **Potential to emit (PTE)** and **actual** emissions thresholds for regulated pollutants
 - **PTE** and **actual** emissions thresholds for HAPs
 - Site location and attainment status of county

Applicability Requirements: Statewide

- Major stationary sources
 - 30 TAC Section 116.12, Nonattainment and Prevention of Significant Deterioration Review Definitions, defines the term major stationary source.
 - The definition is based upon emissions thresholds.
 - The major stationary source emissions threshold can change based on the attainment status of county.

Applicability Requirements: Statewide (cont.)

- Any account (site) that **emits** or has the **PTE** 100 tons per year (tpy) or more of any contaminant (except for greenhouse gases)
- Any account (site) that **emits** or has the **PTE** 10 tpy of any single HAP or 25 tpy of aggregate HAPs as defined in the Federal Clean Air Act, Section 112(a)(1)
- Any account (site) that **emits** or has the **PTE** 0.5 tpy of lead (Pb)

Applicability Requirements: Ozone Nonattainment Areas

- Any account (site) located in an ozone nonattainment area **emitting**:
 - 10 tpy or more of volatile organic compounds (VOC),
 - 25 tpy or more of nitrogen oxides (NO_x), or
 - 100 tpy or more of any other contaminant subject to the National Ambient Air Quality Standards (NAAQS).

Ozone Nonattainment Areas

- The following counties are classified as **serious** nonattainment under the 2008 ozone NAAQS:
 - 10-county Dallas-Fort Worth area:
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise
 - Eight-county Houston-Galveston-Brazoria area:
Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller
- The major source thresholds for these counties is **50 tpy**.
- Bexar County and **El Paso County** are classified as marginal nonattainment under the 2015 ozone NAAQS.

Applicability Requirements: Special EI

- Special EIs are only required from regulated entities that receive a written notification from the TCEQ.
 - Regulated entities must respond to the letter even if the site does not meet reporting thresholds.
- The current special EI for ozone precursors includes sites that **emit** at least 10 tpy of VOC or 25 tpy of NO_x emissions during normal operation and that are located in one of the specified counties on the next slide.

Applicability Requirements: Special EI (cont.)

RY 2021 special EI counties for ozone precursors:

Bastrop	Guadalupe	Hood	Rusk	Victoria
Bell	Hardin	Jefferson	San Patricio	Williamson
Caldwell	Harrison	McLennan	Smith	Wilson
Comal	Hays	Nueces	Travis	
Gregg	Henderson	Orange	Upshur	

Summary of RY 2021 Reporting Thresholds

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 SERIOUS/OZONE	10	50	25	50	100	100	10	10	25	25
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise SERIOUS/OZONE	10	50	25	50	100	100	10	10	25	25
Bexar, El Paso MARGINAL/OZONE	10	100	25	100	100	100	10	10	25	25
See county listing** SPECIAL INVENTORY REPORTING THRESHOLDS FOR OZONE PRECURSORS	10	100	25	100	100	100	10	10	25	25
All 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				

El Paso County 2015 Ozone Nonattainment Designation: Background

- The EPA published the final nonattainment designation on November 30, 2021 and expanded the existing New Mexico Sunland Park nonattainment area to include El Paso County.
- El Paso County is classified as marginal nonattainment for ozone effective December 30, 2021.
- The combined nonattainment area is now the “El Paso-Las Cruces, Texas-New Mexico nonattainment area”.

El Paso County 2015 Ozone Nonattainment Designation and the EI

- What **changed** as the result of the nonattainment designation and marginal classification?
 - For RY 2020 and prior (under the special inventory requirements), the TCEQ had to notify a site in El Paso County to submit an EI that met the 10 tpy VOC or 25 tpy NO_x **actual** reporting thresholds.
 - Starting with RY 2021 (due to the 2015 ozone NAAQS nonattainment designation), the site is responsible for submitting an EI by March 31 if it meets the 10 tpy VOC or 25 tpy NO_x **actual** reporting thresholds according to 30 TAC Section 101.10(a)(2).

El Paso County 2015 Ozone Nonattainment Designation and the EI

- What **changed** as the result of the nonattainment designation and marginal classification (cont.)?
 - The New Source Review major source threshold is impacted.
 - Nonattainment New Source Review (NNSR) will apply for permitting ozone precursor emissions.
 - This can impact a site's applicability under 30 TAC 101.10(a)(1).
- All other EI reporting requirements in 30 TAC Section 101.10 are **NOT** impacted by the nonattainment designation.

Example Applicability Requirements

- Important: If a site (account) meets any of the EI reporting requirements at any time during the calendar year, an updated EI is due.
- Remember, regardless of authorization type or status, this includes:
 - **actual** emissions and/or
 - **potential** emissions.
- Scenario:
 - An operational major source voided the site's applicable permits in June 2021.
 - The site met 30 TAC Section 101.10 **PTE** reporting thresholds.
 - The site must submit a 2021 EI.
 - The 2022 EI may not be required if **none** of the 30 TAC Section 101.10 reporting requirements are met.

Point Source EI Types

- Initial
- Annual update
- Special
- Inapplicability and insignificant emissions change letters

Initial EI

- Sites that have never submitted an EI
- Required to be submitted through the State of Texas Environmental Electronic Reporting System (STEERS) Annual Emissions Inventory Reporting web-based system
 - Also referred to as “Web-EI”
- Due by March 31st

Annual EI Update

- Required every year the reporting criteria are met
- Required to be submitted through Web-EI
- Due March 31st unless otherwise directed in writing by the TCEQ

Special EI

- Applies to regulated entities that receive a written notification from the TCEQ
- Response required even if the site does not meet the reporting thresholds
- Current special EI is for ozone precursors
 - No difference in the type of EI data collected
 - Same format as the initial and annual EI updates
 - Counties listed on previous slide

Inapplicability Notification Letter

- If the site does not meet any of the reporting thresholds in 30 TAC Section 101.10 or the special EI requirements, you may submit a hard-copy letter instead of an EI.
 - You can provide a letter like the example in the *2021 Emissions Inventory Guidelines*, Appendix B.
- When a valid inapplicability letter is submitted, only contact information and tracking dates (e.g., received date) are updated in the database.
- **The TCEQ does not enter emissions in the database for that RY.**

Inapplicability Notification Letter: Two Options

- The sample letter provides two options:
 - remaining on the mailing list for the next RY or
 - requesting to be removed from the mailing list.
- To be removed from the mailing list, submit the inapplicability notification letter with the 'removal from the mailing list' option checked.
- If the last reported emissions in the database **exceed** the applicability requirements, submit a current, updated EI with calculations to be **removed** from the mailing list.

Insignificant Emissions Change Notification Letter

- If changes in emissions for **each** pollutant do not exceed 5% or 5 tpy, whichever is greater, a hard-copy letter can be submitted.
 - The changes can be either increases or decreases.
 - The 5% or 5 tpy criteria are based upon comparing 2021 emissions to the most recently submitted EI entered into the database.
 - If a letter is submitted several years in a row, the EI may need to be updated if the change for a pollutant exceeded 5% or 5 tpy from last submitted EI.
 - The emissions from the last submitted EI are copied to the current year.
 - A sample letter is provided in *2021 Emissions Inventory Guidelines*, Appendix B.

Insignificant Emissions Change Notification Letter (cont.)

- In addition to the insignificant change notification letter, the following must be provided:
 - site information and EI contact information on page 2 of the emissions inventory questionnaire (EIQ);
 - criteria emissions totals and site quantifiable event totals on page 3 of the EIQ;
 - signature of the legally responsible party on page 4 of the EIQ; and
 - updates to information about emissions events (EE) and/or scheduled maintenance, startup, and shutdown activities (SMSS).
 - If the site experienced EE and/or SMSS, then provide EE and/or SMSS updates on the applicable path emissions pages of the EIQ.
 - If the site experienced no EE, then the EE certification statement on page 4 of the EIQ must be signed.

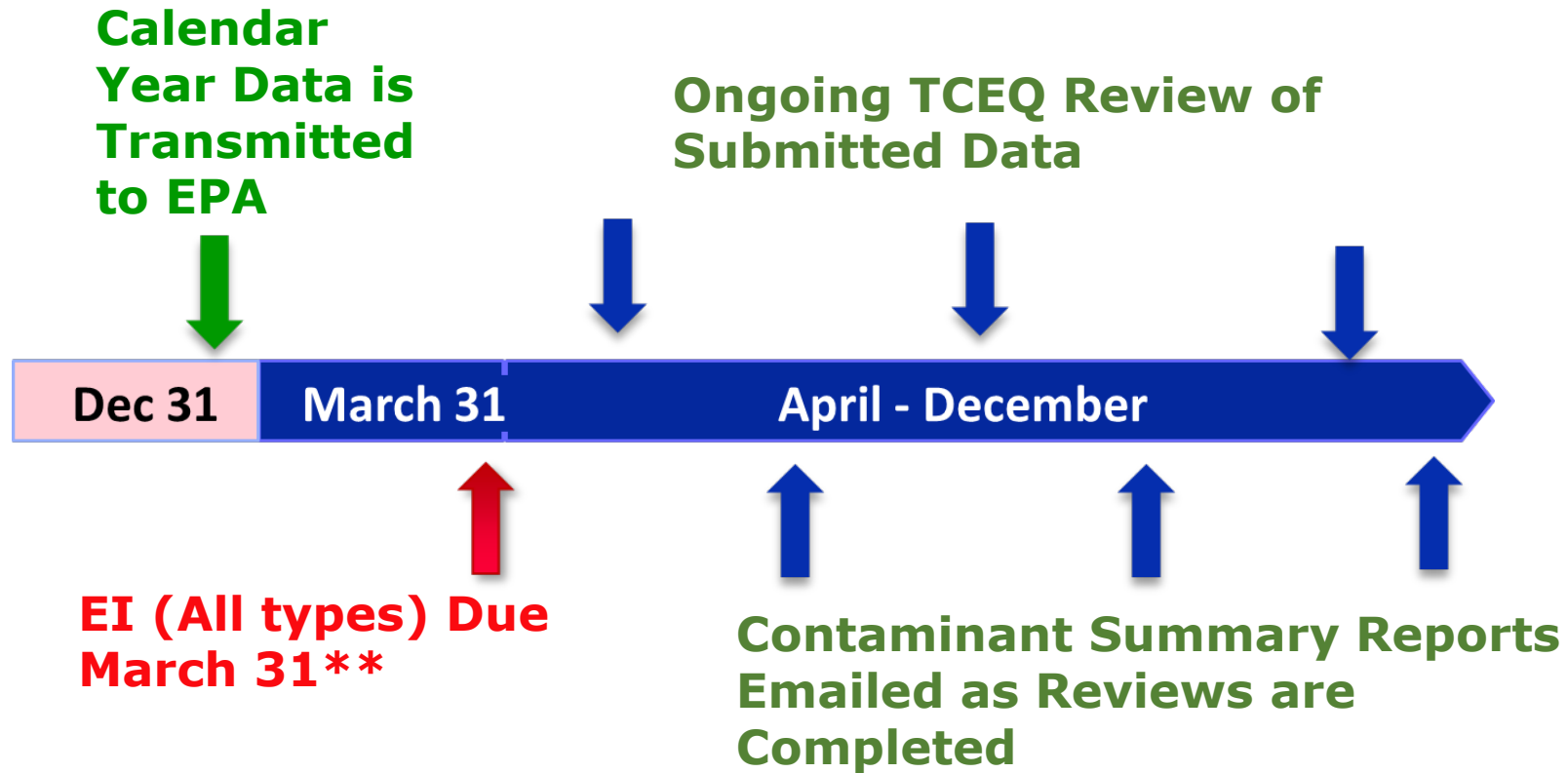
Insignificant Change Notification Letter (cont.)

- Can a company roll over their entire site's previous year's emissions through Web-EI?
 - Yes, however, a hard copy (via mail or hand delivery) of the insignificant emissions change letter or similarly worded letter is still required.
 - Rolling over a site's emissions in STEERS without also submitting a hard copy of the insignificant emissions change notification letter **is not considered a complete submittal**.
 - If rolling over a site's emissions through the Web-EI, the EI certification signature, site quantifiable event totals, EE and/or SMSS path emissions totals, and EE signature are certified through STEERS.
 - These items are not required to be submitted separately with the hard-copy letter.

Who's Responsible and When Is the EI Due?

- The owner or operator of the site at the time the EI is due is responsible for submitting it.
 - The responsible official (RO) for a Title V site or a company representative for a non-Title V site is required to submit through STEERS or provide signatures for letters.
- The due date for sites that submitted an EI the previous year is March 31st unless otherwise directed in writing by the TCEQ.
- The due date for sites that did not submit an EI the previous year but are applicable to reporting requirements is March 31st.

EI Process/Timeline Overview



**** or as directed in writing by the TCEQ**

What Sources Need to be Included in the EI?

- Represent sources individually if the source meets any one of the following:
 - listed in any TCEQ enforceable document such as a permit, regulation, or commissions order; or
 - emitted 1 tpy or more of any regulated pollutant; or
 - emitted 0.1 tpy or more of toxics or HAPs; or
 - emitted 2 pounds or more of mercury and/or Pb.



Which Emissions are Reported?

- Criteria and precursor pollutants: carbon monoxide, sulfur dioxide, VOC, NO_x, Pb, PM₁₀, and PM_{2.5}
 - PM₁₀: particulate matter no larger than 10 microns in diameter
 - PM_{2.5}: particulate matter no larger than 2.5 microns in diameter
- HAPs identified in Federal Clean Air Act, Section 112(b)
 - Also known as air toxics
 - Some examples: mercury, hydrogen fluoride, and hydrochloric acid
- Other regulated air contaminants subject to rules, regulations, permits, orders of the commission, or court orders
 - Some examples: total suspended particulate and non-HAP acids

HAP Emissions

- The EPA updated their review strategy for HAPs and other air toxics data.
 - <https://www.epa.gov/haps/air-toxics-strategy>
 - <https://www.epa.gov/haps/improving-access-air-toxics-data>
- The EPA's health effects modeling includes point source emissions reported to the TCEQ EI.
- Ensure that all HAPs and air toxics reported in the EI are accurate and sample calculations are provided.
 - A **few** HAPs of interest to the EPA include:
 - [ethylene oxide](#),
 - benzene,
 - chromium,
 - hexavalent chromium,
 - hydrogen cyanide,
 - cobalt, and
 - mercury

What Types of Emissions Are Reported?

- **Annual (routine)** emissions are reported in tpy.
- **Ozone season** emissions are reported in pounds per day.
- **SMSS** are reported in tpy.
- **EE** are reported in tpy.
- All emissions data reported in the EI are the **actual** emissions. Do **not** report the **potential** emissions or maximum emissions from the permit.

Using the Best Available Data: General Ranking in Descending Order

Method Code	Description
D	*Continuous emissions monitoring systems (CEMS). If properly operated and calibrated CEMS data is available, it must be used to determine emissions per 30 TAC Section 101.10(c).*
H	Highly reactive volatile organic compounds monitoring systems
F	Predictive emissions monitoring systems
M	Measured data (stack sampling data)
Q	Portable-analyzer measurement data
V	Vendor-supplied emissions factors
A	AP-42 and other factors approved by the United States Environmental Protection Agency or TCEQ
B	Material Balance
S	Scientific Calculation
E	Estimation
O	Other

What Supporting Documentation Should be Submitted with the EI?

- Sample calculations required by 30 TAC Section 101.10
 - Submit sample calculations that are site-specific and that use the current EI year's data.
 - Update sample calculations with each EI submittal.
 - Submit sample calculations for each different process type.
 - Include process rates, operating hours, emissions factors, and their sources.

How is Confidential Documentation Handled?

- **Confidential** information cannot be attached to STEERS or emailed.
- Submit **confidential** information electronically through the **secure** TCEQ File Transfer Protocol (FTPS) webpage.
 - Check to see if you have a FTPS account, sign up for a new account, log into an existing account, and find FTPS help documents at <https://ftps.tceq.texas.gov/>.
 - After logging into the FTPS, upload the confidential files, and share with psdocument@tceq.texas.gov.
- Alternatively, confidential may be mailed or hand delivered (addresses at end of presentation).
- Each page must be clearly marked “**confidential**”.

Revising EI Emissions Data

- When is a company-initiated revision necessary?
 - A revision is necessary to correct EI emissions previously reported in error.
- Revisions are subject to TCEQ review and approval.
- A cover letter signed by the RO (Title V) or company-representative (non-Title V) explaining the reason for the revisions must accompany the revised emissions and supporting documentation.
- When submitting revisions, do not apply information retroactively to emissions calculations, including:
 - emissions factors and
 - measurement or test data.

Revising EI Emissions Data (cont.)

El Year Revision Requested by Company	Can the revisions be entered in the database (subject to TCEQ review and approval)?
2021	Yes
2020	Yes
2019	Case-by-case
2018	Case-by-case
2017	Case-by-case
2016 and prior	No. Filed only and noted in the database tracking system.

EBT and EI

- A site's response for the EI **can** impact eligibility for emission credits under the EBT Program.
- Keep this in mind when submitting your EI!
 - Review the requirements under 30 TAC Section 101.10 to determine if your site is required to report to the point source EI.
 - Eligible credits per facility cannot exceed the emissions reported for that facility in the State Implementation Plan EI.
 - Using best available quantification methods in EI reporting is advantageous.
- Email the EBT Team at ebt@tceq.texas.gov for assistance with credit generation.

EI Guidance Updates, Clarifications, and Reminders

- **Reminder:** The EI due date for RY 2021 is Thursday, March 31, 2022.
- **Update:** The courtesy notification letter is now only emailed to the EI contact by December 31.
 - Sites subject to the special inventory are still mailed a written notification.
- **Update:** Throughout the document, removed references to outdated paper reporting forms and processes.
 - Most of the forms have been permanently removed from the Emissions Assessment Section (EAS) webpage.
 - These forms and other documents are available upon request from the EAS.

EI Guidance Updates, Clarifications, and Reminders (cont.)

Update: Contaminant Summary Reports (CSR) to verify final site-level emissions are emailed.

- After the quality assurance review is complete, the EI contact is emailed instructions.
- A PDF of the site-specific CSR is attached to the email.
- The email is sent from psdocument@tceq.texas.gov.
- After receiving the email, verify the final emissions and EI contact information.
- If updates are required, reply to the email.

El Guidance Updates, Clarifications, and Reminders (cont.)

- **Reminder:** Technical Supplement 6 – Aboveground Liquid Storage Tanks
 - TANKS 4.09d software is not supported by the EPA and should not be used to determine tank emissions.
 - Use the updated AP-42, Chapter 7 equations to determine tank emissions.
- **Update:** Air Fees Basis Forms – Emailed
 - If your site is subject to one of the two air fees, the fee basis forms are now emailed to the fees contact.
 - For additional information, please contact the air fees program at airfees@tceq.texas.gov or visit the air fees webpage at: <https://www.tceq.texas.gov/airquality/point-source-ei/air-fees.html>

El Guidance Updates, Clarifications, and Reminders (cont.)

Update: Appendix A Miscellaneous VOC Sources - VOCs and HAPs from Metal Shredding

- Metal shredding operations to reduce the size of the material being recycled (cars, large appliances, etc..) may emit significant VOC emissions and create particulate matter emissions.
- Determine and report all VOC and HAPs (i.e., heavy metals) emissions from metal recycling sites.
- See the July 2021 EPA Enforcement Alert (Publication no. EPA 310-F-21-003) for more information.
 - <https://www.epa.gov/system/files/documents/2021-07/metalshredder-enfalert.pdf>.
 - <https://www.epa.gov/sites/default/files/2019-09/documents/naturalgasgatheringoperationinviolationcaa-enforcementalert0919.pdf>

El Guidance Updates, Clarifications, and Reminders (cont.)

Update: Technical Supplement 3 – Quantifying Emissions from Components Monitored under Alternative Work Practices (AWP) using an Optical Gas Imaging System (OGI)

- OGI uses a camera with a filter in the infrared spectrum to allow an operator to qualitatively “see” hydrocarbon leaks.
- The TCEQ and the EPA have authorized OGI monitoring of fugitive components under AWP.
 - 30 TAC Section 115.358
 - 40 CFR parts 60, 63, and 65
- The new section in Technical Supplement 3 provides emissions determination guidance for components monitored under an authorized AWP using OGI.

Mailing Addresses

- United States Postal Service

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

- Overnight service (FedEx, UPS, courier, or hand delivery)

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

Online Resources

- Point source EI webpage provides detailed information at www.tceq.texas.gov/goto/ieas
- EI guidelines book (RG-360/21) provides:
 - Step-by-step instructions for completing an EI
 - Yearly updates with current reporting requirements
 - Technical supplements for common emissions sources
- Workshop presentations in PDF (recordings not available)
- Obtain PDFs of site-specific EI reports at <https://www.tceq.texas.gov/assets/public/implementation/air/ie/pseifforms/eiq-print-copy.pdf>

Contact Information

- EAS Helpline: Monday-Friday, 8 AM to 5 PM
 - (512) 239-1773
 - psinvent@tceq.texas.gov

- Air Fees
 - airfees@tceq.texas.gov

- EBT Contact
 - ebt@tceq.texas.gov

Contact Information (cont.)

- Mary Facundo, Air Fees Team Lead
 - mary.facundo@tceq.texas.gov
- Carmen Pedraza, Point Source EI Team Lead
 - carmen.pedraza@tceq.texas.gov
- Danielle Nesvacil, Manager
 - danielle.nesvacil@tceq.texas.gov

Questions?



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Equipment Leak Fugitive Sources: Common Reporting Methods

Overview

- Expected emissions
- Guidance and emission factor resources
- Component types
- Types of leak detection and repair (LDAR) programs
 - **New:** Optical Gas Imaging (OGI)
- Emissions inventory (EI) requirements for determining emissions
 - Monitored
 - Unmonitored
 - Special Considerations

Expected Emissions

- Fugitive emissions from piping components may include organic or inorganic compounds in a gaseous or liquid state, depending upon the composition of streams flowing through the associated piping components.

Guidance and Emission Factors Resources

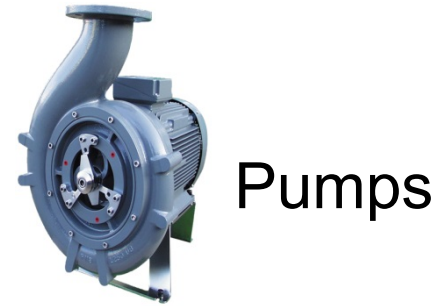
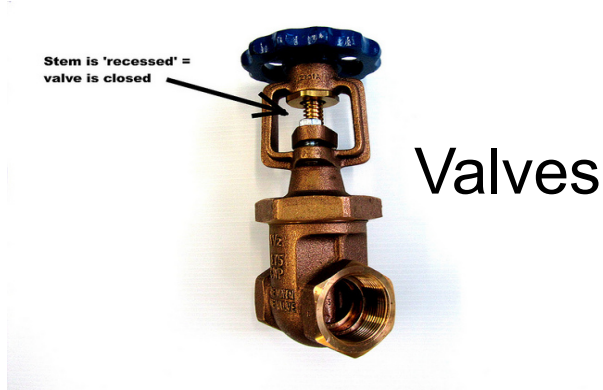
- RG-360/21, *2021 Emissions Inventory Guidelines*, Appendix A, Technical Supplement 3: Fugitive Emissions from Piping Components
- [“Emissions Factors for Equipment Leak Fugitive Components,”](#) Emissions Assessment Section’s (EAS) web page
- [“Protocol for Equipment Leak Emissions Estimates,”](#) Environmental Protection Agency (EPA), 1995 (EPA-453/R-95-017)

Guidance and Emission Factors Resources (cont.)

- [“Preferred and Alternative Methods for Estimating Fugitive Emissions from Equipment Leaks,”](#) (EPA Emissions Inventory Improvement Program Document Series, Volume II, Chapter 4, November 1996)
- [TCEQ Air Permits Technical Guidance for Chemical Sources-
Fugitive Guidance](#), Air Permits Division web page

Traditional Components

Traditional components refer to those component types traditionally reported as sources of fugitive emissions from piping components:



This also includes compressor seals, connectors, pressure relief valves, sampling connections, process drains, and open-ended lines.

Nontraditional Components

Nontraditional components refer to those components traditionally not treated as sources of fugitive emissions but identified as such by recent scientific studies.



Screw fittings



Liquid relief valves



Agitators

This includes heat exchanger heads, sight glasses, bolted manways and hatches, blind flanges, caps and plugs, compression fittings, and metal-to-metal seals.

Nontraditional Components (cont.)

To determine this nontraditional component's emissions...	...use this factor
Agitator	Light liquid pump
Blind flange	Flange
Bolted manway or hatch	Flange
Cap or plug	Flange
Compression fitting	Flange
Heat exchanger head: unmonitored	Open-ended line
Heat exchanger head: monitored	Flange correlation equation

RG-360/21, *2021 Emissions Inventory Guidelines*, Technical Supplement 3, Table A-6

Nontraditional Components (cont.)

To determine this nontraditional component's emissions...	...use this factor
Liquid relief valve	Light liquid value
Metal-to-metal seal	Flange
Screwed fitting	Flange
Sight glass	Flange times two
Pressurized railcar loading arm: threaded connection	0.0214 pound (lb)/hour (hr)/component
Pressurized railcar loading arm: quick-connect coupler	0.0055 lb/hr/component

RG-360/21, *2021 Emissions Inventory Guidelines*, Technical Supplement 3, Table A-6

Fugitive Supporting Documentation

- For each fugitive area with more than 5 tons per year of emissions, provide the following supporting documentation:
 - Type of component with counts for each service type;
 - Volatile organic compound percentages by stream;
 - number of unmonitored components;
 - number of monitored components (leak definition, counts of leaking and pegged readings, monitoring frequency); and
 - LDAR program.
- An example format is provided on the next slide.

Fugitive Supporting Documentation Example

Fugitive Data Form							
TCEQ Emissions Inventory Year _____							
TCEQ Air Account Number: _____				FIN: _____			
COMPONENT COUNTS							
	Service	Unmonitored		Leak definition (ppm)	Monitored		
		Number of components	Number of components		Number of leakers	Number pegged	Monitoring frequency
Valves	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Pumps	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Flanges	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Open-Ended Lines	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Connectors	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Relief Valves	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Compressor Seats	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
Other	Gas/Vapor						
	Light liquid						
	Heavy liquid						
	H ₂ O/Light oil						
VOC PERCENTAGES				MONITORING EQUIPMENT DATA			
Gas/vapor stream: _____ %				Pegged Component Screening Value: _____ ppm			
Light liquid stream: _____ %				Calibration Range: _____ min _____ max			
EMISSIONS DETERMINATION METHODOLOGY OR LDAR PROGRAM USED							
<input type="checkbox"/> Oil and Gas Factors		<input type="checkbox"/> SOCM1 Average Factors		<input type="checkbox"/> SOCM1 without Ethylene Factors			
<input type="checkbox"/> Refinery Factors		<input type="checkbox"/> SOCM1 with Ethylene Factors		<input type="checkbox"/> Correlation Equations			
<input type="checkbox"/> Petroleum Marketing Terminal Factors		<input type="checkbox"/> Other (explain): _____					
LDAR PROGRAM: <input type="checkbox"/> None <input type="checkbox"/> 28M <input type="checkbox"/> 28RCT <input type="checkbox"/> 28VHP <input type="checkbox"/> 28MID <input type="checkbox"/> 28LAER							
<input type="checkbox"/> AVO <input type="checkbox"/> 28CNTA <input type="checkbox"/> 28CNTQ <input type="checkbox"/> HRVOC <input type="checkbox"/> Other: _____							

TCEQ-20417 (12-14-08)

Page 1 of 1

Types of LDAR Programs

- Four basic types of LDAR programs:
 - Instrument monitoring
 - **NEW:** OGI
 - Physical inspection
 - audio/visual/olfactory (AVO)
- Primary reasons for LDAR programs:
 - Required by regulation (state or federal)
 - Required as best available control technology (BACT)
 - Implemented to reduce emissions for other regulatory purposes, such as permitting

LDAR: Instrument Monitoring

- 28 M – BACT for fugitive emissions greater than 10 tons per year (tpy)
- 28 RCT – if subject to 30 Texas Administrative Code (TAC) Section 115.352
- 28 VHP – BACT for fugitives greater than 25 tpy
- 28 MID – used primarily to provide additional control for a specific compound
- 28 LAER – used in nonattainment areas
- 28 CNTA – connectors inspected annually
- 28 CNTQ – connectors inspected quarterly

https://www.tceq.texas.gov/permitting/air/guidance/newsourcereview/fugitives/nsr_fac_eqfug.html

New: OGI Alternative Work Practice

- [30 TAC Section 115.358](#) – Alternative Work Practice
 - Can only be used for components with a leak definition of 500 parts per million by volume or greater
 - Frequency of OGI monitoring is monthly, semi-quarterly, or bi-monthly
 - Requires annual Method 21 monitoring
- 40 Code of Federal Regulations (CFR) Parts 60, 63, and 65, including
 - [40 CFR Section 60.18](#) (g) and (h)
 - [40 CFR Section 63.11](#) (c) thru (e)
 - [40 CFR Section 65.7](#) (e) thru (g)

LDAR: Physical Inspection and AVO

- 28 PI – physical inspection
- 28 PET – petroleum marketing
- 28 NG – natural gas (has been replaced by 28 PI)
- 28 AVO – audio/visual/olfactory inspection for odorous and readily detected compounds: ammonia, chlorine, hydrogen sulfide, hydrogen fluoride, hydrogen cyanide, and mercaptans

Determining Equipment Leak Fugitive Emissions

- Monitored components
 - Routinely monitored
 - Intermittently monitored
- **New:** OGI-monitored components
- Unmonitored components
 - Average emissions factors
 - Monitoring program credits to reduce emissions not allowed, with few exceptions
- Special considerations



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Monitored Components

- Sites with instrument monitoring programs must use the monitoring results to determine and report emissions.
 - LDAR programs typically require retention of monitoring data (i.e., screening values) for individual components.
 - Use actual monitoring data in conjunction with correlation equations.

Using Monitoring Data to Determine Component Emissions

- Using monitoring data with unit-specific correlation equations is the Texas Commission on Environmental Quality (TCEQ)'s preferred method to determine emissions.
- If those are not available, use the EPA correlation equations for the appropriate industry type with monitoring data.
 - Synthetic organic chemical manufacturing industry (SOCMI) components
 - Petroleum industry components (e.g., refineries, marketing terminals)

Using Monitoring Data to Determine Component Emissions (cont.)

- Multiple monitoring periods typically occur during a year.
- For each monitoring period determine emissions using that period's component information and screening data.
 - Sum the emissions from each monitoring period to determine annual emissions.

Using Monitoring Data to Determine Component Emissions (cont.)

- Each screening value obtained will be relative to the compound used to calibrate the instrument.
 - Adjust the screening values by the instrument response factor (obtained either through testing or by reference).
 - Refer to Method 21, applicable regulations, and the EPA protocol for more information.
- Substitute EPA default zero leak factors for screening values of zero.

Using Monitoring Data to Determine Component Emissions (cont.)

- Do not average screening values obtained over the course of a calendar year.
- For leaking components, assume the component was leaking for at least half of the monitoring period's duration.
- Components in a monitoring program area that are not instrument- or OGI-monitored should use average factors.
 - If a weekly physical inspection program is in place, a 30% emissions reduction credit can be applied to the average factors.

Using Monitoring Data to Determine Component Emissions (cont.)

- If the instrument can quantify screening values above 100,000 part per million (ppm), use those readings in the correlation equations.
- For each pegged screening value, use the EPA default 100,000 ppm pegged leak rate factor.
 - If the instrument cannot quantify screening values between 10,000 and 100,000 ppm, use the default 100,000 ppm pegged leak rate factor.

Screening value	Determine emissions using...
Zero	The default zero leak rate factor
Nonzero and nonpegged	The screening value in the applicable correlation equation
Pegged	The default 100,000 ppm pegged leak rate factor

Using Monitoring Data to Determine Component Emissions (cont.)

- Certain regulations or site-specific permit conditions may authorize certain components to be monitored intermittently (e.g., once every four years) instead of routinely (e.g., quarterly).
 - These may include difficult-to-monitor components.
- For intermittently monitored components, use correlation equations and the most recent available screening values.
- If the component was found to be leaking, account for the leak when determining emissions.

New: Using OGI Data to Determine Component Emissions

- Use the following guidance to determine emissions for OGI-monitored components that **do not show** leaks.
 - Use the most recent applicable Method 21 reading unless the component has been changed or altered.
 - If Method 21 data is not available, use the appropriate no-leak screening value factor.
 - The no-leak factor is available from *Protocol for Equipment Leak Estimates*, Tables 2-5 through 2-8.
 - Example scenario: A valve packing was leaking then repaired. The repair was confirmed using OGI. There has been no Method 21 monitoring since the leak, so use the no-leak factor to determine emissions.

New: Using OGI Data to Determine Component Emissions (cont.)

- Use the following guidance to determine emissions for OGI-monitored components that **do show** leaks.
 - If a Method 21 reading was taken of the leaking component, then use Method 21 data.
 - If Method 21 data is not available, then use 100,000 ppm pegged factors from Tables 2-13 and 2-14 of the *Protocols for Equipment Leak Estimates*.
 - For OGI, apply the same leak rate intervals used for correlation equations.

Monitoring Programs that Do Not Use Instruments or OGI

- Odorous or toxic inorganic compounds that cannot be monitored by instrument may be required to have an AVO inspection program.
- AVO programs are different than a weekly walk-through or physical inspection.
 - AVO programs are typically performed once per shift versus once per week.
 - The reduction credits are different.
- For these units, determine emissions using average factors with AVO reduction credits applied.

Unmonitored Components

- Can be present at either:
 - site that monitors components (i.e., components are exempt from monitoring requirements) or
 - site not subject to equipment leak fugitive monitoring regulations
- Use EPA or TCEQ average emissions factors for appropriate industry type:
 - SOCFI
 - oil and gas production
 - refinery
 - petroleum-marketing terminal

Unmonitored Components (cont.)

- Industry subcategories include:
 - SOCOMI factors
 - Average: stream contains between 11% and 85% ethylene by weight (wt% ethylene)
 - Without ethylene: stream contains < 11 wt% ethylene
 - With ethylene: stream contains >85 wt% ethylene
 - Oil and gas factors
 - Natural gas
 - Heavy oil [less than 20° American Petroleum Institute (API) gravity]
 - Light oil (greater than 20° API gravity)
 - Water/light oil (light oil streams with 50% to 99% water by weight)
 - Petroleum marketing terminal
 - Requires monthly walk-through inspection program
 - If inspection is not performed, use refinery factors

Unmonitored Components (cont.)

- Within each industry type, factors vary depending upon industry subcategory (if applicable), component type, and service type.
- Service types include:
 - heavy liquid [vapor pressure ≤ 0.044 lbs per square inch absolute (psia) at 68°F];
 - light liquid (vapor pressure > 0.044 psia at 68°F);
 - water/light liquid; and
 - gas/vapor.
- Component types are generally self-explanatory.
 - If "other" component type is best fit, check the TCEQ's nontraditional component factor list for guidance on determining emissions from these components.

Special Considerations: Unmonitored Component Emissions

- Use of average emissions factors with monitoring program reduction credits is generally not allowed.
- There are exceptions for AVO monitoring program (see earlier slide) and connector monitoring programs.
 - For a weekly physical inspection program where no instrument monitoring is performed, a 30% emissions reduction credit applied to average factors is allowed.
- Hours of operation used in average factor calculations must be 8,760 unless lines are purged.
 - Emissions will occur whenever material is present in the line.

Special Considerations: Unmonitored Component Emissions (cont.)

- Use most appropriate industry type when determining emissions.
- Different process units present at a site may require the use of factors from more than one industry type.
 - Example: For a refinery with a methyl tert-butyl ether (MTBE) production unit, use refinery factors for the refinery units and SOCFI factors for the MTBE units.

Special Considerations: Unmonitored Component Emissions (cont.)

- **Petroleum marketing terminal factors** are used to determine emissions from components at gasoline distribution facilities that are one step removed from local gasoline stations.
 - Pipeline breakout stations in crude oil and refined product service **can** use these factors.
 - Other types of terminals, loading racks at other sites, and upstream oil and gas sites **should not** use these factors.
 - The area must be under a 28 PET inspection program; the factors already account for the inspection program, so no additional control credit should be applied.

Special Considerations: All Component Types

- How are emissions from exempt components determined?
 - Some components can be exempt from monitoring due to size, vapor pressure, location, or other reasons.
 - For most situations, regardless of monitoring status, determine and report emissions for these components in the EI.
 - See Air Permits Division Guidance 6422 for when fugitive emissions are expected to be so low that emissions do not need to be quantified.
- Look out for software programs designed to calculate emissions using screening data from monitored components that inadvertently **exclude** non-monitored components.

Special Considerations: All Component Types (cont.)

- Although monitoring program credits are typically not allowed, credit can be taken on some equipment under additional controls:
 - 100% control credit can be claimed for relief valves, pumps, valves, connectors, and compressors that:
 - meet certain design specifications or
 - vent to a control device.
 - 75% control credit can be claimed for double mechanical seals.
- Quantify emissions from nontraditional components.
 - These could include blind flange, heat exchanger head, and/or sight glass.

Special Considerations: Insulated Components

- Emissions from insulated components will eventually escape to the atmosphere and should be included in the EI.
 - If the components are monitored, use correlation equations to determine emissions.
 - If the components are **not** monitored, use average factors to determine emissions.
 - For weekly physical inspection, a 30% reduction can be applied if the leak can be pinpointed to the component and insulation removed to repair the leak.

Emissions Determination Methodologies

- Unit-specific correlation equations (Code as “M”)
 - **Note:** Developed using bagging data in accordance with EPA guidelines
- EPA correlation equations (Code as “A”)
 - **Note:** Uses screening values from LDAR program
- OGI (**NEW**) (Code as “A”)
 - **Note:** Uses OGI and Method 21 results from LDAR program
- EPA industry average factors (Code as “A”)
 - **Four categories:** SOCMI, oil and gas production, refinery, and petroleum marketing terminals

Contact Information

- EAS helpline: Monday-Friday, 8 AM to 5 PM
 - (512) 239-1773
 - psinvent@tceq.texas.gov
- Point source EI web page: www.tceq.texas.gov/goto/ieas

Questions?



Mark Muldoon

Technical Specialist

mark.muldoon@tceq.texas.gov



***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-EI YouTube Videos

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

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



- Data
- Forms
- Maps
- Public Notices
- Publications
- Records
- Webcasts
- TCEQ Online Services
e-Pay, Permits
Licenses, Reporting
Filing, Comments

Home / Permits, Registrations, and Reporting / Reporting

Questions or Comments:
Info@tceq.texas.gov

Reporting

How to report data to the TCEQ and how to file a complaint.

Reporting Data to the TCEQ

- Air Emissions**
 - Annual Emissions Inventory: **Report Electronically**
 - Air Emissions & Maintenance Events (AEME) Reporting

Chemical Storage

- Tier II Chemical Reporting

Pollution Prevention

- Pollution Prevention (P2) Annual Progress Report under the Waste Reduction Policy Act

Public Water Systems

For All Water Systems:

- Residual Disinfectant
- Consumer Confidence Reports

By Water Source:

- Groundwater
- Surface Water
- Purchased Water

Training

- Training Roster Online Submittal (TROLS): **Report Electronically**

Report an Environmental Problem

- Make an Environmental Complaint
- Report a Spill
- Complaints about an On-Site Sewage Facility
- Toll-free Numbers for Reporting

- Cleanups, Remediation
- Emergency Response
- Licensing
- Permits, Registration
- Preventing Pollution
- Recycling
- Reporting
- Rules

How are we doing? Take our customer satisfaction survey

Welcome to STEERS Test, the State of Texas
Environmental Electronic Reporting System.

Here is what you can do online in STEERS:

e-Permits\Registration:

- >> Aggregate Production Operations Registration
- >> Air New Source Review Registrations
- >> CAFO General Permit
- >> Concrete Batch Plants General Permit
- >> Municipal Solid Waste Notifications
- >> Pesticide General Permit
- >> Petroleum Storage Tank (PST) Self-Certifications
- >> Storm Water General Permits (Construction & Multi-Sector)
- >> Tax Relief for Pollution Control Property **NEW**
- >> Tier II Core Data

e-Reporting:

- >> 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.

Enter STEERS:

ER Account Number:

(ER + 6 digits)

Password:

Login



I need:

- [my password](#)
- [to create a new account](#)
- [to authorize another user's account](#)

Find Out When STEERS Will Be Offline

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](#).

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.
 - STEERS@tceq.texas.gov
 - (512) 239-6925



This is the STEERS TEST environment. If you want to submit OFFICIAL data to TCEQ, you must go to <https://www3.tceq.texas.gov/steers/>.

Welcome to STEERS Internet Version 6.1!

Notice: STEERS automatically logs out after 20 minutes of inactivity. Activity is defined by moving from one page to another, not by entering information on a page.

For more information on how to navigate this site, please visit our [Help](#) section.

Select Reporting Program Area: [Air Emissions and Maintenance Events \(AEME\)](#)
[Annual Emissions Inventory Report \(AEIR\)](#)

OR

Select e-Permits Program Area: [Air New Source Review \(EPR NSR\)](#)

STEERS News:

There are no current news items.



Reminder: This account has probationary program areas and/or program area IDs. These probationary IDs or areas have limited access. To get full access, a signed copy of the STEERS Participation Agreement (SPA) must be received by the TCEQ either by mail or electronically if you have a Texas Drivers License. If you have not sent in the SPA already, please do so.

Account Summary

Account: ER001720	Account Status: ACTIVE - unlocked
Name: Adam D Bullock	Created: 12/07/2018
Company: TCEQ	Activated: 12/07/2018
Title: TCEQ	Last Renewed: 04/30/2020
Email: adam.bullock@tceq.texas.gov	
Phone: 512-239-5155	
Address: 11100 PARK 35 CIRCLE AUSTIN, TX 78753	

STEERS Access

Select STEERS Program to Add or Modify:

<u>Current Program Area</u>	<u>Program</u>	<u># IDs</u>	<u># Probationary</u>
Annual Emissions Inventory Report	AEIR	21	1

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 (RO) or the
 - duly authorized representative (DAR); or
 - for non-Title V sites, the managers or personnel with authority to represent the company or facility.



To add IDs to the account: select a role, relationship, an authorization and either the IDs to add or an account to copy. Press Add IDs or Copy IDs to continue. Press Cancel when done.

Program Status

Access Type: | ** Pick Role ** |

Authorization

Select the appropriate relationship and authorization statement below.

What is the best description of your employer's relationship to the facility or facilities?

- The Facility
Parent Company
Other

Who is authorizing the access?(Select one of the following)

I, Adam D Bullock, am applying for a read, edit, or preparer role and no specific company authorization is required.

-OR-

I, Adam D Bullock, am applying for a sign and submit role and have the authority to enter into this Agreement for the Company under the applicable standards referred to in FCAA 182(a)(3)(B).

I, Adam D Bullock, am applying for a sign and submit role and am authorized by the person below who does have the authority to enter into this Agreement for the Company under the applicable standards referred to in FCAA 182(a)(3)(B).

Authority: (Name of authorizing authority)
Title: (Title of authorizing authority)
Company: (Authorizing company)
Phone: (999-999-9999)

AEIR IDs to Add:

You may enter each ID or copy IDs from another STEERS account.

Enter the air IDs the account needs to access.

You may enter either an Air Account number (without the hyphen) or a Regulated Entity reference number (RN 1-9 digits). If you enter an account number and it is not found, try searching for the site RN number in the TCEQ Central Registry.

Table with 5 columns for entering AEIR IDs.

STEERS Participation Agreement

- Document signed by each STEERS user
 - Paper signature
 - Electronic signature using valid Texas drivers' 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 the ROs or DARs **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 due to COVID-19.



This is the STEERS TEST environment. If you want to submit OFFICIAL data to TCEQ, you must go to <https://www3.tceq.texas.gov/steers/>.

Welcome to STEERS Internet Version 6.1!

Notice: STEERS automatically logs out after 20 minutes of inactivity. Activity is defined by moving from one page to another, not by entering information on a page.

For more information on how to navigate this site, please visit our [Help](#) section.

Select Reporting Program Area: [Air Emissions and Maintenance Events \(AEME\)](#)

[Annual Emissions Inventory Report \(AEIR\)](#)

OR

Select e-Permits Program Area: [Air New Source Review \(EPR NSR\)](#)

STEERS News:

There are no current news items.



RN Number: RN100226794
Account Number: AF0010F
Site Name: IMAGINARY BUSINESS LOCATION
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017
Last Emissions Inventory Year: 2016
Emissions Inventory Status: EXTRACTED

Current STARS Emissions Inventory Contact :

Name: ADAM BULLOCK
Title:
Mailing Address: 12100 PARK 35 CIR
BLDG E
AUSTIN, TX 78753
Phone: 512-239-5155
Fax: 512-239-1515
Email: adam.bullock@tceq.texas.gov

Edit



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Current STARS Emissions Inventory Contact :

Name (First, Last): * ADAM BULLOCK

Name (Middle, Suffix):

Title:

Mailing Addr. (Line1 Line2): * 12100 PARK 35 CIR BLDG E

* City State Zip Code
 AUSTIN TX 78753 -

Business Addr. (Line1 Line2):

City State Zip Code
 -

Phone: * 512 - 239 - 5155 , ext.

Fax: 512 - 239 - 1515

Email: adam.bullock@tceq.texas.gov

* I am the same Contact I am a New Contact



RN Number: RN100226794

Account Number: AF0010F

Site Name: IMAGINARY BUSINESS LOCATION

Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017

Last Emissions Inventory Year: 2016

Emissions Inventory Status: EXTRACTED

Current STARS Emissions Inventory Contact :

Name: ADAM BULLOCK

Title:

Mailing Address: 12100 PARK 35 CIR
BLDG E
AUSTIN, TX 78753

Phone: 512-239-5155

Fax: 512-239-1515

Email: adam.bullock@tceq.texas.gov



RN Number: RN100226794

Account Number: AF0010F

Site Name: IMAGINARY BUSINESS LOCATION

Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017

Last Emissions Inventory Year: 2016

Emissions Inventory Status: EXTRACTED

Select a Table Name from the drop down to select report section to be updated.

Table Name

ACCOUNT-SITE ▾

Search

Cancel



Emissions Inventory Questionnaire Entry Search Today's Date: 10/07/2020



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Select a Table Name from the drop down to select report section to be updated.

Table Name

ACCOUNT-SITE ▾
ACCOUNT-SITE
FIN
EPN
CIN
EMISSION
ADD PATH



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Site Detail

Primary SIC:	4922	Primary SIC Name:	NATURAL GAS TRANSMISSION
UTM Zone:	14	UTM North Meters:	3874074.000
		UTM East Meters:	283919.000

Verify or update new value and save.

Attribute Name	Previous Value	New Value
Hours Per Day	24	* <input type="text" value="24"/>
Days Per Week	7	* <input type="text" value="7"/>
Weeks Per Year	52	* <input type="text" value="52"/>
Annual Operating Hours	8760	* <input type="text" value="8760"/>
Spring Percentage	25	* <input type="text" value="25"/>
Summer Percentage	25	* <input type="text" value="25"/>
Fall Percentage	25	* <input type="text" value="25"/>
Winter Percentage	25	* <input type="text" value="25"/>
Annual Number of Reportable Emission Events	0	* <input type="text" value="0"/>
Annual Number of Non-reportable Emission Events	0	* <input type="text" value="0"/>
Annual Number of Reportable SMSS Events	0	* <input type="text" value="0"/>
Annual Number of Non-reportable SMSS Events	19	* <input type="text" value="19"/>
Annual Opacity Event Total	0	* <input type="text" value="0"/>

* Mandatory field



Emissions Inventory Questionnaire Entry Search Today's Date: 10/07/2020



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Select a Table Name from the drop down to select report section to be updated.

Table Name

ACCOUNT-SITE ▾
ACCOUNT-SITE
FIN
EPN
CIN
EMISSION
ADD PATH

FIN: Facility Identification Number

EPN: Emissions Point Identification Number

CIN: Control Device Identification Number



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Select a FIN to update. If updates are not needed for a FIN, "No Change" may be selected. Save selections before leaving page.

1-5 of 5 Records

FIN	FIN Name	Profile	Status ▲	No Change	Work Area Status	Remove
BLOWDOWN	EMERGENCY BLOWDOWN VENT	BLOWDOWN OPERATIONS	ACTIVE	<input type="checkbox"/>		
ENG	AUXILIARY ENGINE	I.C. ENGINE	ACTIVE	<input type="checkbox"/>		
FUG	AREA FUGITIVES	EQUIPMENT LEAK FUGITIVES	ACTIVE	<input type="checkbox"/>		
TURB	COMPRESSOR TURBINE	TURBINE	ACTIVE	<input type="checkbox"/>		
TANK	CONDENSATE TANK	VERTICAL FIXED ROOF TANK	IDLE	<input type="checkbox"/>		

[Add FIN](#) [Save](#) [Cancel](#)



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

FIN Detail

FIN:	ENG	Name:	AUXILIARY ENGINE
Group:	COMBUSTN	Profile:	I.C. ENGINE
SCC Code:	20300101	SCC Name:	INTERNAL COMBUSTION
		SCC Description:	COMMERCL-INSTUTNLDIST.OIL/DIESEL RECIPROCATING

Verify or update new value and save.

Attribute Name	Previous Value	New Value
Status Code	A	* A - ACTIVE
Status Date (MM/DD/YYYY)	01/01/2006	* 01/01/2006
Hours Per Day	24	* 24
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
Plant ID	COMPRESSOR	COMPRESSOR

Verify or update new value and save.

Attribute Name	Previous Value	New Value
Status Code	A	* A - ACTIVE
Status Date (MM/DD/YYYY)	01/01/2006	* 01/01/2006
Hours Per Day	24	* 24
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
Plant ID	COMPRESSOR	COMPRESSOR
Percent Maximum Capacity	1	* 1
Start Time	0	* 0
Firing Type	OT	* OT - OTHER
2 or 4 Cycle (CYCLE)	4	* 4
Burn Type	RICH	* RICH - RICH BURN ENGINE
Engine Rating (HP)	300	* 300
Total Annual Aggregate Heat Input (MMBTU)		
NOx Emissions Factor		
Comment		

Save Cancel

* Mandatory field



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Select a Table Name from the drop down to select report section to be updated.

Table Name

ACCOUNT-SITE v
ACCOUNT-SITE
FIN
EPN
CIN
EMISSION
ADD PATH



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Select a FIN or an EPN to update Path Emissions.

1-5 of 5 Records

<u>FIN</u> ▲	<u>FIN Name</u>	<u>EPN</u>	<u>EPN Name</u>	<u>CIN</u>	<u>Work Area</u>	<u>Status</u>	<u>Remove</u>
<u>BLOWDOWN</u>	EMERGENCY BLOWDOWN VENT	<u>BLOWDOWN</u>	BLOWDOWN	<u>N</u>			
<u>ENG</u>	AUXILIARY ENGINE	<u>A-1</u>	AUXILIARY STACK	<u>N</u>			
<u>FUG</u>	AREA FUGITIVES	<u>FUG</u>	AREA FUGITIVES	<u>N</u>			
<u>TANK</u>	CONDENSATE TANK	<u>TANK</u>	TANK STACK	<u>N</u>			
<u>TURB</u>	COMPRESSOR TURBINE	<u>T-1</u>	TURBINE STACK	<u>N</u>			

Cancel



RN Number: RN100226794
 Account Number: AF0010F
 Site Name: IMAGINARY BUSINESS LOCATION
 Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017
 Last Emissions Inventory Year: 2016
 Emissions Inventory Status: EXTRACTED

Emissions Detail

FIN: ENG Name: AUXILIARY ENGINE
 EPN: A-1 Name: AUXILIARY STACK

7 Contaminant(s) Exist.

Emissions for all contaminants must be updated. Click 'Rollover' if emissions are unchanged from previous value. Only newly added contaminants may be removed.

Code	Contaminant	Determination Method	Previous Annual (TPY)	Annual (TPY)	Previous Ozone (PPD)	Ozone (PPD)	SMSS (TPY)	EE (TPY)	Remove
10000	PART-U	* AP-42	0.0021	*	0	*	0	*	Rollover
20000	PM10 PART-U	* AP-42	0.0021	*	0	*	0	*	Rollover
39999	TOTAL PM2.5 PARTICULATE	* AP-42	0.0021	*	0	*	0	*	Rollover
50001	VOC-UNCLASSIFIED	* AP-42	0.014	*	0	*	0	*	Rollover
70400	NITROGEN OXIDES	* AP-42	0.0294	*	0	*	0	*	Rollover
70510	SULFUR DIOXIDE	* AP-42	0.0019	*	0	*	0	*	Rollover
90300	CARBON MONOXIDE	* AP-42	0.0063	*	0	*	0	*	Rollover

Add Contaminant Save Cancel

* Mandatory field



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Current STARS Emissions Inventory Contact :

Name: **ADAM BULLOCK**
Title:
Mailing Address: **12100 PARK 35 CIR
BLDG E
AUSTIN, TX 78753**
Phone: **512-239-5155**
Fax: **512-239-1515**
Email: **adam.bullock@tceq.texas.gov**

**Error Log**

Tracking

Work Area

EIQ Entry

Inventory Detail

STEERS Home

Upload Air Emissions Inventory File

Today's Date: 08/16/2017

14:52



RN Number: RN100226794

Account Number: AF0010F

Site Name: IMAGINARY BUSINESS LOCATION

Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017

Last Emissions Inventory Year: 2016

Emissions Inventory Status: EXTRACTED

Press browse and select the file you want to upload. Then press the "Upload File" button. To be accepted, the file cannot exceed 13 MB in size, must be [ASCII text, Pipe delimited format](#), and the file name should be RN100226794_UPLOAD.txt. Imported files are placed in a queue to process.

File to be uploaded: No file chosen

Submitting EI 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 EI 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.**



RN Number:	RN100226794	Current Emissions Inventory Year:	2017
Account Number:	AF0010F	Last Emissions Inventory Year:	2016
Site Name:	IMAGINARY BUSINESS LOCATION	Emissions Inventory Status:	EXTRACTED
Organization Name:	NOT A REAL COMPANY LLC		

Current STARS Emissions Inventory Contact :

Name: **ADAM BULLOCK**
Title:
Mailing Address: **12100 PARK 35 CIR
BLDG E
AUSTIN, TX 78753**
Phone: **512-239-5155**
Fax: **512-239-1515**
Email: **adam.bullock@tceq.texas.gov**

[Edit](#)

RN Number: RN100226794
Account Number: AF0010F
Site Name: IMAGINARY BUSINESS LOCATION
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017
Last Emissions Inventory Year: 2016
Emissions Inventory Status: EXTRACTED

Supporting document successfully attached.

CRITERIA EMISSIONS TOTALS

Class	Name	Annual (TPY)	Ozone (PPD)	SMSS (TPY)	EE (TPY)
PM2.5	PM2.5 EMISSIONS	1.5001	0.0000	0.0000	0.0000
VOC	VOLATILE ORGANIC COMPOUND EMISSIONS	13.6700	64.9000	9.5000	0.0000
CO	CARBON MONOXIDE EMISSIONS	3.2000	0.0000	0.0000	0.0000
NOX	OXIDES OF NITROGEN EMISSIONS	6.1000	0.0000	0.0000	0.0000
SO2	SULFUR DIOXIDE EMISSIONS	0.5000	0.0000	0.0000	0.0000
PB	LEAD EMISSIONS	0.0000	0.0000	0.0000	0.0000
PM10	PM10 EMISSIONS	1.5001	0.0000	0.0000	0.0000

Criteria emissions totals based on data loaded into STEERS by an authorized STEERS user.

SITE QUANTIFIABLE EVENT TOTALS

Reportable Emission Events: 0
Non-Reportable Emission Events: 0
Reportable Scheduled Maintenance, Startup, or Shutdown Activities: 0
Non-Reportable Scheduled Maintenance, Startup, or Shutdown Activities: 19
Excess Opacity Events: 0

Attach Supporting Document(s): Please limit files to 30 MB in size.

After browsing to and choosing a file click the attach button.

Under no circumstances should CONFIDENTIAL information be attached.

Confidential information should be mailed separately.

Attach: No file chosen

Attached: [Sample Calculations.xlsx](#) 

(clicking on a link above will open a new window)

Review Work Area Records

Table Name

Submit Emissions Inventory

- Emissions Events were experienced at RN100226794
 No Emissions Events were experienced at RN100226794

RN Number: RN100226794
Account Number: AF0010F
Site Name: IMAGINARY BUSINESS LOCATION
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2017
Last Emissions Inventory Year: 2016
Emissions Inventory Status: EXTRACTED

CRITERIA EMISSIONS TOTALS

Class	Name	Annual (TPY)	Ozone (PPD)	SMSS (TPY)	EE (TPY)
PM2.5	PM2.5 EMISSIONS	1.5001	0.0000	0.0000	0.0000
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CO	CARBON MONOXIDE EMISSIONS	3.2000	0.0000	0.0000	0.0000
NOX	OXIDES OF NITROGEN EMISSIONS	6.1000	0.0000	0.0000	0.0000
SO2	SULFUR DIOXIDE EMISSIONS	0.5000	0.0000	0.0000	0.0000
PB	LEAD EMISSIONS	0.0000	0.0000	0.0000	0.0000
PM10	PM10 EMISSIONS	1.5001	0.0000	0.0000	0.0000

Criteria emissions totals based on data loaded into STEERS by an authorized STEERS user.

SITE QUANTIFIABLE EVENT TOTALS

Reportable Emission Events: 0
 Non-Reportable Emission Events: 0
 Reportable Scheduled Maintenance, Startup, or Shutdown Activities: 0
 Non-Reportable Scheduled Maintenance, Startup, or Shutdown Activities: 19
 Excess Opacity Events: 0

Attached Supporting Document(s)

File Name	Hash	Mime-Type
Sample Calculations.xlsx	2E673B828873808A08363C688847755BC98D127C8DA91C92E97803568CA24620	application/xlsx

(clicking on a link above will open a new window)

I certify that the information submitted is complete and accurate to the best of my knowledge. By entering my password and pressing the "Confirm Submit" button, I agree that:

1. I am David Bulloch I, the owner of the STEERS account ER001175.
2. I have the authority to submit this data on behalf of RN100226794, IMAGINARY BUSINESS LOCATION.
3. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
4. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
5. I am knowingly and intentionally submitting 155 records. I have personally examined the foregoing and am familiar with its content and the content of any attachments.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I do hereby certify that information reported in this inventory is true, accurate, and fully represents the emissions that occurred during the Emissions Inventory Reporting Year to the best of my knowledge.

[Emissions Inventory Records 1 to 155](#) (This will open a new window)

Password:

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 <https://ftps.tceq.texas.gov/>
 - Upload and share with psdocument@tceq.texas.gov.
 - 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
 - Updating user account or submitting SPA may address the above issues
- Web-EI issues: may need to contact EAS
 - Missing options
 - Portions not accessible
 - Unknown errors

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
- Tim Vinciguerra, Ph.D., Emissions Inventory Specialist
 - tim.vinciguerra@tceq.texas.gov

Questions?



Adam Bullock

Technical Specialist

adam.bullock@tceq.texas.gov