

# **Point Source Emissions Inventories Overview**

### **Overview**

- What is an emissions inventory (EI)?
- What is EI data used for?
- Applicability requirements
- Types of Els
- Reporting responsibility and due date
- Information to include in the EI
- Revisions to the EI
- Reminders and what's new for reporting year (RY) 2022
- Online resources and contact information

# What is an EI?

- An annual survey of point sources, such as chemical plants, refineries, electrical plants, and other industrial sites that meet the criteria of the emissions inventory rule 30 Texas Administrative Code (TAC) Section 101.10.
- Includes the following data:
  - Sources creating air pollution
  - Chemical/physical identity and amounts of the air pollutants
  - Specific geographic location/area covered
  - Time periods that emissions are released
  - Specific release information: height, velocity, temperature



# **Use of the El**





# **30 TAC Section 101.10**

Rule organization:

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



### 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 hazardous air pollutants (HAP)
- Site location and attainment status of county



# **Statewide Applicability Requirements**

#### 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.



# **Statewide Applicability Requirements (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 0.5 tpy of lead (Pb) or has the PTE 10 tpy of Pb



### **Requirements for 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<sub>X</sub>), or
  - 100 tpy or more of any other contaminant subject to the National Ambient Air Quality Standards (NAAQS).
- Lower thresholds apply for nonattainment areas.
- Statewide requirements for lead and HAPs stay the same regardless of attainment designation.



# Requirements for Ozone Nonattainment Areas (cont.)

 Counties reclassified as SEVERE nonattainment under the 2008 ozone NAAQS:

10-county Dallas-Fort Worth and eight-county Houston-Galveston-Brazoria area counties:

Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller

- **Bexar** county is classified as **MODERATE** nonattainment under the 2015 ozone NAAQS.
- *El Paso c*ounty is classified as **MARGINAL** nonattainment under the 2015 ozone NAAQS.

# **Special El Requirements**

- Special EIs are only required from regulated entities that receive a written notification from the Texas Commission on Environmental Quality (TCEQ).
- Regulated entities must respond to the letter **by the due date** 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<sub>X</sub> actual emissions during normal operations and that are located in one of the specified counties on the next slide.



### **Special El Counties Required to Report El**

#### **RY 2022 Special Inventory 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 2022 Reporting Requirements

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										
re	reporting requirements for ozone precursor potential emissions.									
County	VOC		NO <sub>X</sub>		Other		Individual HAP		Aggregated HAP	
	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
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise <b>SEVERE / OZONE</b>	10	25	25	25	100	100	10	10	25	25
Bexar MODERATE/ OZONE	10	100	25	100	100	100	10	10	25	25
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									



# **Applicability Requirements Example**

- If a site (account) meets any of the EI reporting requirements at any time during the calendar year, an updated EI is due, 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 2022**.
  - The site **met** 30 TAC Section 101.10, based on **PTE** reporting thresholds. **The site must submit a 2022 EI.**
  - If **none** of the 30 TAC Section 101.10 reporting requirements are met for RY 2023, the 2023 EI may not be required.

# **Point Source El Types**

- 1) Initial
- 2) Annual update
  - Inapplicability letters
  - Insignificant emissions change letters
- 3) Special



### **Initial El**

- 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 El Update**

• Required every year the reporting criteria are met

- Required to be submitted through Web-EI
- Due March 31<sup>st</sup> unless otherwise directed in writing by the TCEQ



### **Special El**

- Applies to regulated entities that receive a written notification from the TCEQ (currently 23 counties are subject)
- Response is 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.

- See Appendix B. Sample Letters of the 2022 Emissions Inventory Guidelines for an example letter.
- When a valid inapplicability letter is submitted, only contact information and tracking dates (e.g., received date) will be updated in the database.

#### • The TCEQ will not enter emissions in the database for that RY.



# Mail List Options for Inapplicability Notification

 If you wish to *remain* on the Emissions Assessment Section (EAS) mailing list for the next RY and keep receiving notices, select:

□ Please keep this site on the annual emissions inventory mailing list.

• To be *removed* from the mailing list, submit the inapplicability notification letter selecting the following option:

Please remove this site from the annual emissions inventory mailing list.

If the <u>most recently</u> recorded emissions in the database **exceed** the applicability requirements, submit a current, updated EI with calculations to be *removed* from the mailing list.



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# **Insignificant Emissions Change Notification**

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 2022 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 2022 Emissions Inventory Guidelines, Appendix B.

# **Insignificant Emissions Change Notification (cont.)**

The following must also be provided:

- 1) Page 2 of the emissions inventory questionnaire (EIQ) with site information and EI contact information for applicable RY
- 2) Page 3 of the EIQ with criteria emissions totals and site quantifiable event totals for applicable RY
- 3) Page 4 of the EIQ with signature of the legally responsible party.

4) Finally,



### **Insignificant Emissions Change Notification (cont.)**

If the site experienced no Emissions Event (EE):

**EE certification** statement on page 4 of the EIQ **must also be signed.**  If the site <u>did</u> experience EE and/or Scheduled maintenance, startup, shutdown (SMSS) events that resulted in emissions:

**Updated EIQ pages** for the specific paths with emissions must be provided.



# **Insignificant Emissions Change Notification (cont.)**

When using Web-EI to roll over a site's entire EI from the previous year:

- A hard copy of the insignificant emissions change letter or similarly worded letter is still required via mail or hand delivery.
- 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.



# **Reporting Responsibility and Due Date**

- The owner or operator of the site **at the time the El is due** is responsible for submitting it.
- STEERS submittal/ letters
  - Title V site: the responsible official (RO) signature is required
  - Non-Title V site: company representative <u>signature</u> is required
- The due date for sites that submitted an EI the previous year is March 31<sup>st</sup> 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 31<sup>st</sup>.



### **Timeline Overview**



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



# Information to Include in the EI: Sources

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.





### Information to Include in the EI: Pollutants

- Criteria and precursor pollutants: carbon monoxide, sulfur dioxide, VOC, NO<sub>X</sub>, Pb, PM<sub>10</sub>, and PM<sub>2.5</sub>
  PM<sub>10</sub>: particulate matter no larger than 10 microns in diameter
  PM<sub>2.5</sub>: 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



# **Note about HAP Emissions**

- The EPA updated their review strategy for HAPs and other air toxics data.
  - <u>https://www.epa.gov/haps/air-toxics-strategy</u>
  - 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
     mercury



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# **Types of Emissions to Include in the El**

- 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.



### **Best Available Emissions Data Should be Included**

Method Code	Description: Preferred Methodologies in Descending Order
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).*
н	Highly reactive volatile organic compounds monitoring systems
F	Predictive emissions monitoring systems
Μ	Measured data (stack sampling data)
Q	Portable-analyzer measurement data
V	Vendor-supplied emissions factors
Α	AP-42 and other factors approved by the United States Environmental Protection Agency or TCEQ
В	Material Balance
S	Scientific Calculation
Е	Estimation
0	Other



# **Supporting Documentation to Include in 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.



### Do <u>Not</u> Include Confidential Documentation with the EI

- 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 <u>https://ftps.tceq.texas.gov/</u>.
  - 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".

### **Summary: Requirements for a Complete Submission**

El Reporting Type	STEERS Submittal	Hard Copy	Responsible Official Signature	EE Certification	Sample Calculations
Annual Update	✓	NO OPTION	✓	✓	$\checkmark$
Inapplicability	NO OPTION	✓	✓	✓	UPON REQUEST
Insignificant Change Notice	NO OPTION	✓	✓	✓	UPON REQUEST
Initial El	✓	NO OPTION	✓	✓	$\checkmark$
Special El	✓	NO OPTION	✓	✓	$\checkmark$



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# **EI Revisions**

- 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.

### **El Revisions Policy Summary**

El Year Revision Requested by Company	Can the revisions be entered in the database (subject to TCEQ review and approval)?
2022	Yes
2021	Yes
2020	Case-by-case
2019	Case-by-case
2018	Case-by-case
2017 and prior	No. Filed only and noted in the database tracking system.


#### Reminders

- El due date: The El due date for RY 2022 is Friday, March 31, 2023.
- Notification letter: The courtesy notification letter is only emailed to the EI contact by December 31, except sites subject to the special inventory which are still mailed a written notification.
- Contaminant summary reports (CSR): notice to verify final site-level emissions are only emailed.
  - After the quality assurance review is complete, the EI contact is emailed instructions and a PDF of the site-specific CSR.
  - 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.

#### **Reminders (cont.)**

- Fees program: 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 <u>airfees@tceq.texas.gov</u> or visit the air fees webpage at: <u>https://www.tceq.texas.gov/airquality/point-source-ei/air-fees.html</u>.
- Tanks: Use the updated AP-42, Chapter 7 equations to determine tank emissions instead of TANKS 4.09d software.
- Fugitive emissions: Use emissions determination guidance for components monitored under an authorized Alternative Work Practice using an optical gas imaging system.



#### **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
- El guidelines book (RG-360/22) 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 <u>https://www.tceq.texas.gov/downloads/air-quality/point-source/forms/eiq-print-copy-v3.pdf</u>

#### **Contact Information**

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

airfees@tceq.texas.gov

Emissions Banking & Trading Contact
 <u>ebt@tceq.texas.gov</u>





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#### Volatile Organic Compounds (VOC) Emissions Calculations



- Common emissions methodologies for VOC sources
- Emission inventory (EI) guidance for estimating VOC emissions



## **VOC Speciation**

- VOC speciation criteria are based on geographic location.
  - Site is located in El Paso county -or- is east of 100° longitude line

Non-combustion sources that emit at least 5 tons per year (tpy) annually

• All other sites:

Non-combustion sources that emit at least 25 tpy annually

- Speciation entails:
  - Speciate emissions to at least 90%.
  - Species less than 0.1 tpy may be grouped under VOCunclassified.
- VOC speciation requirements are distinct from hazardous air pollutants speciation requirements.

## **Above Ground Liquid Storage Tanks**

- Determining emissions from breathing and working losses
  - AP-42, chapter 7 (or software programs that use those equations) is a common method.
- Determining emissions from flashing losses
  - Direct measurement (coded as "M") is the most preferred method.
  - Process simulator is generally the next preferred method.
  - Please reference Appendix A in the Texas Commission on Environmental Quality (TCEQ)'s *Emission Inventory Guidelines*.



### Marine Facilities: VOC Sources

- Dock VOC emission sources may include: Fugitive VOCs from equipment leak fugitives
- Dockside marine vessel emissions may include:
  - VOCs from loading or unloading liquid bulk materials
  - VOCs from loading or unloading liquefied gaseous materials
  - VOCs from degassing and cleaning liquid vessel compartments
  - VOCs from abrasive blasting and surface coating



## **Marine Facilities: Determining Emissions**

- Annual emission rates
  - The amount and type of material processed
  - Speciation of any VOC emissions
  - Temperature, vapor pressure, molecular weight, and any other data necessary to determine emissions
- Ozone season emission rates
  - Ozone season: May through September
  - Emissions rate expressed in pounds-per-day

Total pounds emitted during season divided by 153 days



## Marine Facilities: Speciating VOC Emissions

- Loading and unloading emissions will have composition of the same material.
- Vessel gas freeing and conditioning emissions will have composition of previously loaded material or of material now being loaded.
- Degassing and cleaning emissions will have composition of previously-held material.



## **Fugitive Emissions from Piping Components**

Emissions determination methodologies: order of preference

- Unit-specific correlation equations developed using bagging data in accordance with United States Environmental Protection Agency (EPA) guidelines (code as "M")
- EPA correlation equations using screening values from a leak detection and repair (LDAR) program (code as "A")
- EPA industry-appropriate average factors (code as "A")



## Fugitive Emissions from Piping Components (cont.)

Please note:

- The application of LDAR reduction credits to the EPA average factors is no longer accepted, with few exceptions.
- One exception is noted in the 2023 Emission Inventory Guidelines, which deals with audio/visual/olfactory inspections.



## Fugitive Emissions from Piping Components (cont.)

Quantifying emissions using correlation equations

- Calculations for monitored components must use site specific data.
- Correlation equations must be used when retention of screening value data is required by any of the following:
  - permit condition,
  - EPA rule, or
  - TCEQ rule.



## Fugitive Emissions from Piping Components (cont.)

#### **Emissions determination requirements**

- Average emission factors should be used to quantify emissions from unmonitored components
- Average emission factors are divided into four categories:
  - synthetic organic chemical manufacturing industry
  - oil and gas production
  - refinery
  - petroleum-marketing terminal



## **Cooling Towers**

Emissions determination methodologies: order of preference

- Emissions data from a highly reactive volatile organic compound monitoring system required by 30 TAC Section115.764 (coded "H")
- Emissions data from a TCEQ-approved air-stripping method (coded "M")
- Emissions data from an approved monitoring and control program plan, other than an air-stripping method, on file with the TCEQ (coded "B")
- Emissions data from an unapproved monitoring and control program (coded "E")
- The AP-42 uncontrolled VOC factor (coded "A")



### Combustion Sources: Internal Combustion Engines

Common methodologies for VOC emissions, found below, are in order of preference (list is not comprehensive).

- M (measured: stack test data)
- V (vendor-supplied emissions factor)
- A (AP-42 or other EPA-approved factor)



#### Internal Combustion Engines: Stack Test and Vendor Data

For both methodologies, ensure that the test measured VOCs rather than total hydrocarbons.

- Stack testing and vendor data can sometimes be a measure of total organic carbon (TOC) and not of VOC.
- VOC emissions must be determined by multiplying the hydrocarbon emission factor by the following ratio: AP-42 VOC emission factor / AP-42 TOC emission factor.
- The determination methodology must be coded "S" (detailed in the following slides).



### Internal Combustion Engines: Stack Test and Vendor Data (cont.)

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.



## Internal Combustion Engines: Total VOC

- Only use the AP-42 VOC factor to calculate total VOC emissions when no better methodology (e.g., stack test, vendor data) is available.
- Occasionally, stack test or vendor data provides total hydrocarbons (THC) or TOC instead of VOC.
  - Determine VOC emissions by multiplying the THC or TOC emissions factor by the appropriate AP-42 ratio.

TOC EF  $\times \frac{AP-42 \text{ VOC emissions factor}}{AP-42 \text{ TOC emissions factor}}$ 

- Do not apply the inlet gas VOC percentage to the THC factor to obtain a VOC factor.
- Code emissions as "S" for scientifically calculated.

## **Example Calculation: Calculating Total VOC**

**Example:** Using the AP-42 ratio method, determine a VOC emissions factor if given a total organic carbon (TOC) stack test factor for a 4-cycle rich burn engine.

• AP-42 VOC emissions factor / AP-42 TOC emissions factor

 $\frac{0.0296 \text{ lb/MMBtu}}{0.358 \text{ lb/MMBtu}} = 0.0827$ 

• TOC stack test factor × AP-42 ratio = VOC factor

 $5 \text{ g/hp-hr} \times 0.0827 = 0.413 \text{ g/hp-hr}$ 

• Emissions coded "S" for scientifically calculated

pound = (lb), 1 million British thermal unit (MMBtu), gram (g), horsepower (hp), hour (hr)

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## Internal Combustion Engines: VOC Speciation

To speciate VOC emissions with a total VOC factor, use the following 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 compound 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.



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

**Example:** Speciate VOC emissions (1.2 tpy) for a 4-cycle lean burn (4CLB) engine when only a total VOC vendor factor is provided.

- 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 × 0.447 = 0.536 tpy of formaldehyde (coded "S")
- Calculate the remainder VOC.

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



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

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



### **Online Resources**

- Point Source EI webpage provides detailed information at <u>www.tceq.texas.gov/goto/ieas</u>
- 2022 Emissions Inventory Guidelines (RG-360/22) provides:
  - Step-by-step instructions for completing an EI
  - Yearly updates with current reporting requirements
  - Technical supplements for common emissions sources
  - Found on point source website
- Obtain PDFs of site-specific EI reports at <u>https://www.tceq.texas.gov/downloads/air-quality/point-source/forms/eiq-print-copy-v3.pdf</u>

### **Questions?**

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#### 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 EI 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.

Site Help | Disclaimer | Web Policies | Accessibility | Our Compact with Texans | TCEQ Homeland Security | Contact Us Statewide Links: Texas.gov | Texas Homeland Security | TRAIL Statewide Archive | Texas Veterans Portal

# 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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	ER001720	Acc	ount Status:		- unlocked							
	Adam D Bullock		Created:									
Company:			Activated:									
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	adam.bullock@tceq.te											
	512-239-5155	2										
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Annual Em	ilssions 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
    - Designated Representative (DR) or the
    - Alternate Designated Representative (ADR); or
  - for non-Title V sites, the managers or personnel with authority to represent the company or facility.



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		role, relationship, an autho or Copy IDs to continue. Pr			add or	5¢EE
Program Status	Access Type:   ** [	Pick Role **		~		
Alect the appropria	te relationship and aut	horization statement below.				
⊖ The Facility ⊖ Parent Compa		r employer's relationship to	o the facility or fa	acilities?		
ੇ Other						
	llock, am applying fo	ect one of the following) or a read, edit, or preparer role	and no specific co	mpany		
-OR-						
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	Phone:		(999-999-9999)			
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## **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 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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Summer Percentage	25	* 25		
Fall Percentage	25	* 25		
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Plant ID	COMPRESSOR	COMPRESSOR		

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Verify or update new value and save.

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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
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\* Mandatory field





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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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co		MONOXIDE EMISSIONS	3.2000	0.0000	0.0000	0.0000
NOX		F NITROGEN EMISSIONS	6.1000	0.0000	0.0000	0.0000
SO2	SULFUR D	DIOXIDE EMISSIONS	0.5000	0.0000	0.0000	0.0000
PB	LEAD EMI	SSIONS	0.0000	0.0000	0.0000	0.0000
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					JYEERJ				
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CO CARBON M	IONOXIDE EMISSIONS	3.2000	0.0000	0.0000	0.0000				
NOX OXIDES OF	NITROGEN EMISSIONS	6.1000	0.0000	0.0000	0.0000				
SO2 SULFUR DI	OXIDE EMISSIONS	0.5000	0.0000	0.0000	0.0000				
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<ul> <li>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: <ol> <li>I am David Bulloch I, the owner of the STEERS account ER001175.</li> <li>I have the authority to submit this data on behalf of RN100226794, IMAGINARY BUSINESS LOCATION.</li> <li>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 constitutes an electronic signature.</li> <li>I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol></li></ul>									
	ntory Reporting Year to the best of my knowle								

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

Password:

Do Not Submit Confirm Submit

### **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 <a href="https://ftps.tceq.texas.gov/">https://ftps.tceq.texas.gov/</a>
  - 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-El

- 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):
  - <u>steers@tceq.texas.gov</u>
  - (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>

