



# **What's New for Emissions Inventory (EI) and State of Texas Environmental Electronic Reporting System (STEERS) Reporting Basics**

# Overview

- General emissions inventory (EI) applicability
- *2025 Emissions Inventory Guidelines* updates
- STEERS reporting basics

# El Applicability Requirements: Major Sources

- 30 Texas Administrative Code (TAC) Section 101.10
- In general, the sources in the following list (slides three through five) are required to submit an annual point source EI.
- 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.

# EI Applicability Requirements

- Any account (site) that **emits** or has the potential to emit (**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 hazardous air pollutant (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.

# EI Applicability Requirements (cont.)

- Any account (site) located in an ozone nonattainment area **emitting**:
  - 10 tpy or more of volatile organic compounds (VOC) or
  - 25 tpy or more of nitrogen oxides (NO<sub>x</sub>).
- Any source subject to a Texas Commission on Environmental Quality (TCEQ) special inventory.
  - Special inventories are only required from regulated entities that receive a written notification from TCEQ.
- Additional information on EI applicability and the EI rule (30 TAC 101.10) can be found on the [Point Source EI webpage](#).

# Summary of 2025 EI 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 reporting requirements for ozone precursor potential emissions.

| County  | VOC                     |           | NOx    |           | Other  |                            | Individual HAP |           | Aggregated HAP |           |
|---|-------------------------|-----------|--------|-----------|--------|----------------------------|----------------|-----------|----------------|-----------|
| CLASSIFICATION/POLLUTANT  | Actual                  | Potential | Actual | Potential | Actual | Potential                  | Actual         | Potential | Actual         | Potential |
| Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller<br><b>SEVERE/OZONE</b>    | 10                      | 25        | 25     | 25        | 100    | 100                        | 10             | 10        | 25             | 25        |
| Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise<br><b>SEVERE/OZONE</b> | 10                      | 25        | 25     | 25        | 100    | 100                        | 10             | 10        | 25             | 25        |
| Bexar<br><b>SERIOUS/OZONE</b>   | 10                      | 50        | 25     | 50        | 100    | 100                        | 10             | 10        | 25             | 25        |
| See county listing**<br>SPECIAL INVENTORY<br>REPORTING THRESHOLDS<br>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        |
| <b>Statewide</b>  | <b>Lead (Pb) Actual</b> |           |        |           |        | <b>Lead (Pb) Potential</b> |                |           |                |           |
| REPORTING THRESHOLDS<br>FOR LEAD (ALL COUNTIES)   | 0.5                     |           |        |           |        | 10                         |                |           |                |           |



# ***2025 Emissions Inventory Guidelines Updates***



# What is the EI Guidelines?

- TCEQ annually updates its EI guidelines document that provides technical assistance on multiple topics, including:
  - setting up an initial EI,
  - creating emissions inventory structure,
  - determining and reporting emissions, and
  - revisions to the prior reporting year.
- This document can be found on the [Point Source EI webpage.](#)



# EI Guidelines Updates

- **Update:** Explains when it's acceptable to use factors other than AP-42 for PM emissions
- **Clarification:** Use of methods other than EPA Reference Method 21 for equipment leak estimates
- **Update:** Instructions for emissions determinations from Tanks 5.1.
- **Update:** E&P TANK 2.0 and the Vasquez-Beggs correlation equation will no longer be accepted for EI purposes starting with the calendar year 2026 inventory.
  - Air Permits Division no longer accepts these determination methods for air permitting purposes as of September 2025.

# El Guidelines Updates (cont.)

- **Clarification:** EPA has not updated the Code of Federal Regulations to reflect the DC Circuit Court's reversal of El Paso's nonattainment designation for the 2015 eight-hour ozone National Ambient Air Quality Standard.
- **Update:** Corrected the HAPs subsection citation of the federal Clean Air Act
- **Clarification:** Ozone season calculations

# STEERS Reporting Basics

# Overview

- STEERS
- STEERS account
  - Creating and updating an account
  - Program access: levels of authority
  - STEERS Participation Agreement (SPA) form

# 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 webpage](#).

# What is STEERS?

- Portal for accessing various TCEQ online reporting programs, such as:
  - Air New Source Review registrations
  - Emissions banking and trading
  - Pesticide general permits
  - Annual Emissions Inventory Reporting (AEIR) module aka Web-EI
  - Air Emissions and Inspection Fees (AEIF) module aka Web-Fees
- 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.



## 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](#)



## 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:



#### 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: Security Questions and Configuration

- Select and provide answers to several security questions.
  - These questions will be used later during STEERS login for security and user verification.
- Configure program access during account creation.
  - AEIR or AEIF
  - Each program is configured separately.
- Contact TCEQ STEERS staff with issues on this portion of STEERS.
  - [STEERS@tceq.texas.gov](mailto: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 6.9!

**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 Program Area: [Air Emissions and Inspection Fees \(AEIF\)](#)  
[Annual Emissions Inventory Report \(AEIR\)](#)

### STEERS News:

There are no current news items.



## Account Summary

**Account:** ER002017

**Name:** Karina V Pardo

**Company:** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

**Title:** NAT RES SPECIALIST II

**Email:** karina.pardo@tceq.texas.gov

**Phone:**

**Address:** 12100 PARK THIRTY FIVE CIR BLDG E 248 S  
AUSTIN, TX 78753

**Account Status:** ACTIVE - unlocked

**Created:** 08/03/2022

**Activated:** 08/03/2022

**Last Renewed:** 11/04/2025

## STEERS Access

Select STEERS Program to Add or Modify: -- Select program to add or modify --

Go

| <u>Current Program Area</u>                       | <u>Program</u> | <u># IDs</u> |
|---|----------------|--------------|
| <a href="#">Air Emissions and Inspection Fees</a> | AEIF           | 2            |
| <a href="#">Annual Emissions Inventory Report</a> | AEIR           | 1            |



# Creating/Updating a STEERS Account: Access Types

- 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 TCEQ
- Complete authorization:
  - Yourself: self-authorization
  - Another person: requires another individual to verify

# Program Access - Levels of Authority

## (IMPORTANT)

- Third-party consultants **cannot** have submit authority.
  - Per 30 TAC Section 101.10(d), the owner or operator of a site must certify the EI data.
- Submit authority should be limited to:
  - Title V sites
    - Responsible Official (RO),
    - Designated Representative (DR), and/or
    - Alternate Designated Representative (ADR); and
  - Non-Title V sites
    - The managers or personnel with authority to represent the company or facility.



**Add New AEIR IDs**

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, Karina V Pardo, am applying for a read, edit, or preparer role and no specific company authorization is required.

**-OR-**

- ☐ I, Karina V Pardo, 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, Karina V Pardo, 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)**AEIR IDs to Add**

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

**Enter AEIR IDs**

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 + 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](#).

|                      |                      |                      |                      |                      |
|----------------------|----------------------|----------------------|----------------------|----------------------|
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |

Add IDs

Cancel

# SPA

- The SPA is signed by each STEERS user:
  - paper signature,
  - electronic signature using valid Texas driver's license, or
  - Nexis Lexis InstantId.
- Certifies that users understand and agree to all rules and requirements of STEERS.
- Must be submitted for:
  - new STEERS accounts, and
  - existing STEERS accounts when updating or adding new access.



## Account Summary

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**Name:** Karina V Pardo

**Company:** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

**Title:** NAT RES SPECIALIST II

**Email:** karina.pardo@tceq.texas.gov

**Phone:**

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## STEERS Access

Select STEERS Program to Add or Modify: -- Select program to add or modify --

Go

| <u>Current Program Area</u>                       | <u>Program</u> | <u># IDs</u> |
|---|----------------|--------------|
| <a href="#">Air Emissions and Inspection Fees</a> | AEIF           | 2            |
| <a href="#">Annual Emissions Inventory Report</a> | AEIR           | 1            |



STEERS Select SPA Type

User: ER002017

12:46



Please select whether you want to generate the entire SPA or a partial SPA for a specific authorization. Or select E-sign above to sign your account electronically with an identity proofing service.

### Generate Your SPA

To generate the entire SPA, press the "Generate Your SPA" button below.

-- OR --

### Generate SPA for a Single Authorization

All fields are required. You must enter the information the same as you did in the authorization form.

**First Name:**  (Authorization first name.)

**Last Name:**  (Authorization last name.)

**Company Name:**  (Enter at least one keyword.)

**Title:**  (Enter at least one keyword.)

## Sign Electronically with an Identity Proofing Service

Please select the 3rd party identity proofing service to continue. Selecting the service will update the form to collect the information needed for the service. All fields are required except for the ones marked as optional.

**Note:** By clicking E-Sign SPA, you understand the service is voluntary and you are validating personally identifying information against a 3rd-Party service which will return evidence of validation of the personally identifying information you provide back to TCEQ. TCEQ will not retain the sensitive personally identifying information such as your SSN, birthdate, or TDL; however, TCEQ will receive evidence of identity validation which is used to identify you for legal purposes.

**Important:** In development and user test, identity proofing is not turned on unless testing of the service interface is occurring. Due to this, please provide data that matches the field name or field instructions.

**Identity Proofing:** Texas Online Authentication Service - TX Driver's License (Class C only) ▼

**First Name:** Karina

**Middle Initial:** (Optional)

**Last Name:** Pardo

**Company Name:** TEXAS COMMISSION ON ENVIRONME

**Title:** NAT RES SPECIALIST II

**TDL Number:** (8 to 10-digit number)

**TDL Audit Number:** (11-, 16- or 20- digit number on license)

**Last 4 of SSN:**

**Date of Birth:** (mm/dd/yyyy)

☐ I, Karina V Pardo, have the authority to enter into this Agreement for TEXAS COMMISSION ON ENVIRONMENTAL QUALITY under the applicable standards listed below.

☐ I, Karina V Pardo, certify that I am signing this document with my personally identifying information authenticated by a 3rd-Party service, selected above, which returns evidence of validation the provided information back to TCEQ.

E-Sign SPA

Cancel

**Signature verification can take several minutes.  
Please do not press the E-sign button more than once.**

### Sign Electronically with an Identity Proofing Service

Please select the 3rd party identity proofing service to continue. Selecting the service will update the form to collect the information needed for the service. All fields are required except for the ones marked as optional.

**Note:** By clicking E-Sign SPA, you understand the service is voluntary and you are validating personally identifying information against a 3rd-Party service which will return evidence of validation of the personally identifying information you provide back to TCEQ. TCEQ will not retain the sensitive personally identifying information such as your SSN, birthdate, or TDL; however, TCEQ will receive evidence of identity validation which is used to identify you for legal purposes.

**Important:** In development and user test, identity proofing is not turned on unless testing of the service interface is occurring. Due to this, please provide data that matches the field name or field instructions.

**Identity Proofing:** LexisNexis InstantId (nationwide) ▼

**First Name:** Karina

**Middle Initial:** (Optional)

**Last Name:** Pardo

**Company Name:** TEXAS COMMISSION ON ENVIRONME

**Title:** NAT RES SPECIALIST II

**Home Address:**

**Home Address 2:** (Optional)

**City:**

**State:** Texas ▼

**ZIP Code:**

**Home Phone:** (Enter like 555-555-5555)

**Last 4 of SSN:**

**Date of Birth:** (mm/dd/yyyy)

- ☐ I, Karina V Pardo, have the authority to enter into this Agreement for TEXAS COMMISSION ON ENVIRONMENTAL QUALITY under the applicable standards listed below.
- ☐ I, Karina V Pardo, certify that I am signing this document with my personally identifying information authenticated by a 3rd-Party service, selected above, which returns evidence of validation the provided information back to TCEQ.

E-Sign SPA

Cancel

**Signature verification can take several minutes.  
Please do not press the E-sign button more than once.**

## SPA (cont.)

- New accounts and changes to an account are on probation until the SPA is received by TCEQ.
- LexisNexis InstantId (nationwide) can be used if the STEERS user does not have a valid Texas driver's license.
- Signing an E-Sign SPA with either option will immediately grant access to your selected reporting program.



# Common Questions: STEERS Access

- Who should have AEIR and AEIF 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.

# Common Questions: STEERS Access (cont.)

- Company personnel have changed, but they still have STEERS access?
  - Those persons need to update their individual STEERS user accounts and remove unneeded access.
  - Otherwise, STEERS staff can assist with updating STEERS user accounts.
- Remember – STEERS can help with STEERS user account issues while EAS can help with AEIR and AEIF issues.
  - EAS can help troubleshoot STEERS user accounts but may not be able to correct the issue.

# Common Questions: STEERS Probation

- Why can't I access the AEIR or AEIF system?
  - Check the "STEERS Access" section under "My Account."
  - Is anything listed as on "Probation?"
- Submitting a new SPA may address many issues.

# Up Next

- The next presentations will cover detailed instructions on Web-EI reporting and Web-Fees reporting.
- Common reporting issues and clarification will be provided.

# Contact Information

- EAS helpline: Monday-Friday, 8 AM to 5 PM
  - (512) 239-1773
  - [psinvent@tceq.texas.gov](mailto:psinvent@tceq.texas.gov)
- STEERS (non-Web-EI and non-Web-Fees questions):
  - [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov)
  - (512) 239-6925
- Karina Pardo, Data Analyst
  - [Karina.Pardo@tceq.texas.gov](mailto:Karina.Pardo@tceq.texas.gov)
  - (512) 239-3941



**Questions?**





# Air Fees and Web-Fees Reporting

State of Texas Environmental Electronic Reporting System (STEERS)  
Air Emissions and Inspection Fees (AEIF) Reporting



# Overview

- Important dates
- What's new
- Air fees background
- Air fees applicability (who needs to report?)
- What to report
- STEERS AEIF demonstration
- Frequently asked questions
- Contact and additional reference info

# Important Dates to Remember

- Air fees program operates by fiscal year (FY) instead of calendar year.
  - Each FY runs from September 1 through August 31.
  - Sites use expected status for the upcoming FY when reporting to air fees.
- For FY2027, air fees will collect data corresponding to 9/1/2026 through 8/31/2027.
- Site contact will be emailed a notification around **April 2**.
- Deadline to submit form to air fees will be **June 1**.
- FY2027 invoices anticipated to be sent to the air fees contact in late **October 2026**.

# Update to FY2026 Air Emissions Fee Invoices

- The FY2026 air emissions fee rate is still under review.
- TCEQ will divide the air emissions fee invoice into two parts during FY2026.
- The first invoice was sent on November 30 and is due December 31.
- The second invoice is estimated to be sent in spring of 2026.
  - TCEQ will provide as much lead time as possible prior to the second payment being due.

# What's New for FY2027 Air Fees?

- Air fees reporting for FY2027 will be through the STEERS AEIF program.
- New sites that meet reporting requirements will need to contact the air fees program to receive an air account number and establish the account in STEERS.
- If a site needs to revise their submittal (i.e., emissions updates, status change, etc.), please contact the air fees program.
  - Revisions to the emissions inventory (EI) are not automatically updated in the air fees system.

# Background – Two Annual Air Fees

30 Texas Administrative  
Code (TAC) Section 101.24

AKA the “air inspection fee”

Collected to recover the  
cost of TCEQ air programs

30 TAC Section 101.27

AKA the “air emissions fee”

Collected to recover the  
direct and indirect costs of  
the Federal Operating  
Permit (Title V) program

- Sites applicable to both fees are only invoiced on the fee that carries the higher dollar amount.

# Background: Fee Rates

- Fees are assessed if the site is active for any portion of the reporting FY.
- Fee rates are adjusted annually based on the consumer price index and updated no later than October 1.
- The current fee rates are located at:
  - **Air inspection fee rate and schedule:**  
[https://www.tceq.texas.gov/downloads/air-quality/point-source/fees/eif\\_rates.pdf](https://www.tceq.texas.gov/downloads/air-quality/point-source/fees/eif_rates.pdf)
  - **Air emissions fee rate:** <https://www.tceq.texas.gov/downloads/air-quality/point-source/fees/aef-rates.pdf>

# Background: Fee Reporting Applicability

- Sites are applicable to the air fees program if they meet one or both of the following rule criteria during the reporting FY:
- **Inspection fee**
  - Have a standard industrial classification (SIC) code and description listed in 30 TAC 101.24(f).
    - Some SIC codes have tier letters based on levels of throughput/capacity.
- **Emissions fee**
  - Have a Title V permit or will be operating under conditions that require a Title V permit (regardless of authorization status) for any portion of the FY.
    - If the Title V permit expires or is voided during fiscal year, a full fee is still assessed.
- If a site meets applicability for both fees, reporting for both fees must occur.

# Background: What if My Site Fails to Report?

- Not submitting a fee basis form makes assessing an accurate annual emissions fee rate difficult.
- Violations for non-submittal of fee basis forms will be issued.
- Not submitting the air fee basis form on time may result in a potential Title V deviation for applicable sites.
  - Reminder: The emissions fee is applicable if the Title V permit was active or the site was operating under Title V conditions for any portion of the FY.



# Background: What if My Site Fails to Pay the Fee?

- Delinquent accounts
  - Accounts that have not paid an invoiced fee.
  - Interest and penalties will accrue monthly.
  - Permit applications will not be declared administratively complete until all fees/penalties have been paid in full.

# Background: Air Inspection Fee

- The air inspection fee is based on SIC code, description, and capacity/throughput as listed in 30 TAC 101.24(f).
- For air fees purposes, some SIC codes have multiple tier letters based on levels of capacity/throughput.
- If the site operates under multiple SIC codes applicable to the inspection fee, the SIC code and tier letter carrying highest dollar amount must be reported.

# Example: Multiple SIC Codes Subject to Inspection Fee

- Hypothetical site operates under SIC 2869 and 2899 with the following capacities:
  - SIC 2869 -> capacity 90 million pounds/year (lbs/yr) -> SIC 2869 Tier B
  - SIC 2899 -> capacity 120 million lbs/yr -> SIC 2899 Tier C
- SIC 2869 Tier B carries higher fee rate. The site should report SIC 2869B.
- Site will be assessed on SIC 2869B regardless if 2869 is primary or secondary SIC.

| Description           | Capacity/Throughput  | SIC Code | Tier | Inspection Fee Amount for FY2025 |
|-----------------------|--|----------|------|----------------------------------|
| ORGANIC CHEMICALS     | Capacity of at least 1 million lbs/yr, but less than 10 million lbs/yr   | 2869     | A    | \$8,734.80                       |
| ORGANIC CHEMICALS     | Capacity of at least 10 million lbs/yr, but less than 100 million lbs/yr | 2869     | B    | \$17,460.90                      |
| ORGANIC CHEMICALS     | Capacity of at least 100 million lbs/yr                                  | 2869     | C    | \$34,921.80                      |
| CHEMICAL PREPARATIONS | Capacity of at least 1 million lbs/yr, but less than 10 million lbs/yr   | 2899     | A    | \$2,331.60                       |
| CHEMICAL PREPARATIONS | Capacity of at least 10 million lbs/yr, but less than 100 million lbs/yr | 2899     | B    | \$4,663.20                       |
| CHEMICAL PREPARATIONS | Capacity of at least 100 million lbs/yr                                  | 2899     | C    | \$9,317.70                       |

# Background: Air Emissions Fee

- Applicable sites are assessed on **permit allowable emissions** in effect during FY or **actual emissions** (last full calendar year) of **all regulated pollutants at the site** per 30 TAC Section 101.27(f)(3).
  - Under no circumstances may the fee basis be less than the actual emissions.
  - Fee assessed up to 4,000 tons for each regulated pollutant.
  - Greenhouse gases as defined in 30 TAC Section 101.1 are not assessed for fee purposes.

| Regulated Pollutants<br>(Includes all regulated pollutants on site) ? | Allowable Emissions Rates<br>(Tons per Year) | ACTUAL EMISSIONS<br>(CY 2025) ? |                         |                       |
|---|--|---------------------------------|-------------------------|-----------------------|
|   |  | Routine<br>(Tons per Year)      | SMSS<br>(Tons per Year) | EE<br>(Tons per Year) |
| Volatile organic compounds (VOC) ?                                    | <input type="text"/>                         | <input type="text"/>            | <input type="text"/>    | <input type="text"/>  |
| Carbon monoxide (CO)  | <input type="text"/>                         | <input type="text"/>            | <input type="text"/>    | <input type="text"/>  |
| Nitrogen oxides (NOx)   | <input type="text"/>                         | <input type="text"/>            | <input type="text"/>    | <input type="text"/>  |
| Sulfur dioxide (SO2)  | <input type="text"/>                         | <input type="text"/>            | <input type="text"/>    | <input type="text"/>  |
| Particulate matter (PM) total ?                                       | <input type="text"/>                         | <input type="text"/>            | <input type="text"/>    | <input type="text"/>  |

Add New

Save

# Background: Air Emissions Fee (cont.)

- This is NOT an EI fee; however, a complete and verifiable EI must be submitted if site wishes to use actual emissions for fee assessment.
  - Allowable emissions must be reported if a site has not submitted a complete and verifiable EI.

# Reporting Actual Emissions: Authorized MSS, SMSS, and EE

- Authorized maintenance, start-up, and shutdown (**MSS**) emissions
  - Emissions that are authorized through a permit.
  - These emissions should be reported in the annual **routine emissions** category.
- Scheduled maintenance, start-up, and shutdown (**SMSS**) emissions
  - Emissions as defined in 30 TAC Sections 101.1 and 101.211.
  - These are not permitted emissions.
  - These emissions are reported in the SMSS emissions category.
- All emissions from emissions events (**EE**) should be reported in the EE column.
- Reminder: this follows the same reporting guidelines as the EI.

# Reporting Actual Emissions

- Actual emissions are based on the last full calendar year emissions and are associated with authorized routine activities, SMSS, and EE.
- All EE and SMSS emissions should be reported, regardless of classification as “reportable” or “non-reportable” as defined in 30 TAC Sections 101.1, 101.201, and 101.211.
- A complete and verifiable EI must be submitted for accurate fee basis if a company wishes to be assessed on actual emissions.



# Example: Reporting Actual Emissions

| Regulated Pollutants<br>(Includes all regulated<br>pollutants on site) ? | Allowable Emissions Rates<br>(Tons per Year) | ACTUAL EMISSIONS<br>(CY 2025)? |                         |                       |
|--|--|--------------------------------|-------------------------|-----------------------|
|  |  | Routine<br>(Tons per Year)     | SMSS<br>(Tons per Year) | EE<br>(Tons per Year) |
| Volatile organic compounds<br>(VOC) ?                                    | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Carbon monoxide (CO)   | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Nitrogen oxides (NOx)  | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Sulfur dioxide (SO2)   | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Particulate matter (PM) total<br>?                                       | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |

Add New

Save

- Routine, SMSS, and EE emissions from previous calendar year should be reported.
- Reference the EI data on file for criteria pollutants.
- If there are additional regulated pollutants over 0.1 tons, select “Add New” and select a pollutant from the drop-down menu.
  - Additional regulated pollutant examples include ammonia and hydrogen sulfide.

# Reporting Allowable Emissions

- Allowable emissions rates are the site's potential-to-emit (PTE) thresholds.
- Allowable emissions rates or limits are specified in:
  - Enforceable document(s), such as a permit;
  - Certified registration of emissions; or
  - Commission order(s).
- These limits must be in effect during the FY that the emissions fee is assessed.

# Reporting Allowable Emissions (cont.)

- Supporting documentation should be provided to verify PTE.
- If site had any emissions from SMSS or EE, these should also be included when reporting allowable emissions rates.

# Example: Reporting Allowable Emissions

| Regulated Pollutants<br>(Includes all regulated<br>pollutants on site) ? | Allowable Emissions Rates<br>(Tons per Year) | ACTUAL EMISSIONS<br>(CY 2025)? |                         |                       |
|--|--|--------------------------------|-------------------------|-----------------------|
|  |  | Routine<br>(Tons per Year)     | SMSS<br>(Tons per Year) | EE<br>(Tons per Year) |
| Volatile organic compounds<br>(VOC) ?                                    | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Carbon monoxide (CO)   | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Nitrogen oxides (NOx)  | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Sulfur dioxide (SO2)   | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |
| Particulate matter (PM) total<br>?                                       | <input type="text"/>                         | <input type="text"/>           | <input type="text"/>    | <input type="text"/>  |

- Provide PTE rates in the “Allowable Emissions Rates” and, if applicable, provide “Actual SMSS and EE”.
- If there are additional regulated pollutants, select “Add New” and select a pollutant from the drop-down menu.

# What Needs to be Reported on Air Fees Form?

- Company, site name, and billing contact updates
- Site operational status for reporting FY
- Inspection fee information
- Emissions fee information
- Comments and attachments

# Reporting – Company, Site Name, and Contact Updates

- Company updates
  - Provide updates if the company name or customer number (CN) on file in air fees database does not match Central Registry.
    - NOTE: air fees will not update CN information in our database unless it matches Central Registry.
- Site name updates
  - Provide updates if the site name has changed or needs clarification.

# Reporting – Company, Site Name, and Contact Updates (cont.)

- Billing (air fees) contact updates
  - Billing contact is also referred to as the air fees contact.
  - Ensure contact information is current.
  - Name / phone # / email / mailing address should be for site's technical or environmental contact.
  - TCEQ uses the mailing address for both technical and non-technical correspondence, and mails invoices to this address.



# Reporting – Site Status: Active and Idle

- Only **one** status can be selected.
  - Incorrect reporting of status may result in processing delays.
- **Active**
  - Site will be active / operational for **any portion** of the FY (including maintenance).
  - Should be selected if the site is **expected** to operate.
- **Idle**
  - Site will not operate for any portion of the FY but retains the ability to operate in future FYs.

# Reporting – Site Status: Shutdown and Transfers

- **Shutdown (Permanently)**

- Site will not operate at any point in the future and was not sold. All air permits associated with RN must be voided.
- Provide site shutdown date and air permit voidance information.

- **Sold**

- New owner information is required to process fee basis form.
- It is the previous owner's responsibility to provide new owner information.
  - New owner does not select this status.

- **Merged**

- Date of merger and destination RN are required to process fee basis form.
- Must be already approved by Air Permits and not currently undergoing review.
- Not for sites that erroneously received an additional RN that describes same site.

# Reporting – Site Status: Qualification and Not Built

- **Does Not Qualify**

- Only use if the site does not have an applicable SIC code/description listed in 30 TAC Section 101.24 **and** is not required to obtain/possess a Title V permit during the FY.
- Must provide explanation


- **Not Built (Under Construction)**

- Use when the site has:
  - Applied for an air permit or has obtained a permit but is under construction, **and**
  - Will not operate at any point in the FY.

# **STEERS AEIF Demo**

## **Using the Web-Fees System**

# STEERS AEIF Demonstration

 TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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My Account   Review Imports   Submissions   Activity   **STEERS Home**

STEERS Home   14:39



**NOTE:** Check out the air fees webpage for guidance to help set up a STEERS account and to link your RN(s) to the AEIF program!

## Welcome to STEERS Internet Version 6.9!

**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 Program Area: [Air Emissions and Inspection Fees \(AEIF\)](#)  
[Annual Emissions Inventory Report \(AEIR\)](#)



## STEERS News:

There are no current news items.

# AEIF Demo – Select Account




Select RN

There are 10 records. Please select one to continue.

| <a href="#">RN</a> ▲          | <a href="#">Account</a> | <a href="#">Site Name</a> | <a href="#">Organization Name</a> | <a href="#">Status</a> |
|-------------------------------|-------------------------|---------------------------|-----------------------------------|------------------------|
| → <a href="#">RN101010101</a> | BF1234X                 | CENTRAL TEXAS FACILITY #4 | REAL PLASTICS CORP                | CREATED                |
|                               |                         |                           |                                   | UPLOADED               |
|                               |                         |                           |                                   | UPLOADED               |



# AEIF Demo: Start of Fee Basis Form




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ENVIRONMENTAL QUALITY

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Air Emissions and Inspection Fees (AEIF) Home    Account: RN101010101/BF1234X    Today's Date: 2/05/2026    20:00



Account Information on File

RN/Account: RN101010101/BF1234X

Site Name: CENTRAL TEXAS FACILITY #4

CN: CN612345678

Company: REAL PLASTICS CORP

Fiscal Year: 2027

Report Status: CREATED

County: BELL

SIC: 3083

Billing Contact: JOHN DOE


Mailing Address: 1234 REAL STREET

POST OAK, TX 76503-6110

Phone: 555-555-5555

Email: JOHN.DOE@REALPLASTICS.COM

Air Emissions and Inspection Fee Report



Start

The AIR EMISSIONS/INSPECTION FEE BASIS REPORT for **Fiscal Year (FY) 2027** (9/1/2026 – 8/31/2027)  
Per 30 Texas Administrative Code (TAC) §101.24(b) and 101.27(b), this form is **due June 1, 2026**.

For assistance, please reference the Air Fees Webpage:  
<http://www.tceq.texas.gov/airquality/point-source-ei/air-fees.html>.



# AEIF Demo: Account Information



## Account Information on File

|   |  |
|---|--|
| <b>RN/Account:</b> RN101010101/BF1234X      | <b>County:</b> BELL                      |
| <b>Site Name:</b> CENTRAL TEXAS FACILITY #4 | <b>SIC:</b> 3083                         |
| <b>CN:</b> CN612345678                      | <b>Billing Contact:</b> JOHN DOE         |
| <b>Company:</b> REAL PLASTICS CORP          | <b>Mailing Address:</b> 1234 REAL STREET |
| <b>Fiscal Year:</b> 2027                    | POST OAK, TX 76503-6110                  |
| <b>Report Status:</b> CREATED               | <b>Phone:</b> 555-555-5555               |
|   | <b>Email:</b> JOHN.DOE@REALPLASTICS.COM  |

## Account Information

Please complete the questions below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

\* indicates a required field

### Site/Company Information

\*Do you need to update your site name or owner name? ? NO Update

### Billing Contact Information

\*Do you need to update your billing contact? ? NO Update


### Status of Account

\*What is the status of your account? ? --Select a Status-- Update

Next Cancel

# AEIF Demo: Company and Billing Contact Update

## –Site/Company Information


\*Do you need to update your site name or owner name?  YES ▾

\*Site Name: CENTRAL TEXAS FACILITY BELL

\*Company Name: REAL PLASTICS CORP

\*CN: CN612345678

## –Billing Contact Information

\*Do you need to update your billing contact?  YES ▾

\*First Name: JOHN

Middle Name:

\*Last Name: DOE

Job Title:

\*Country: UNITED STATES ▾

\*Mailing Address: 1234 REAL STREET (include Suite or Bldg here, if applicable)

Routing: (such as Mail Code, Dpt, Attn: or C/O)

\*City: POST OAK

\*State: TEXAS ▾

\*ZIP Code: 76503

\*Phone: 555-555-5555 (999-999-9999)

Phone Extension:

\*Email: JOHN.DOE@REALPLASTICS.COM

# AEIF Demo: Site Status Dropdown

## Account Information

Please complete the questions below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

\* indicates a required field

### Site/Company Information

\*Do you need to update your site name or owner name? ? NO

### Billing Contact Information

\*Do you need to update your billing contact? ? NO

### Status of Account

\*What is the status of your account? ? --Select a Status--   
--Select a Status--  
ACTIVE  
IDLE  
SHUTDOWN  
MERGED  
DOES NOT QUALIFY  
NOT BUILT  
SOLD





# AEIF Demo: Sold


## Account Information

Please complete the questions below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form. You must have javascript enabled to fill out the report.



\* indicates a required field


## Site/Company Information

\*Do you need to update your site name or owner name?  NO 



 **Site/Company question response must be YES if status is SOLD.**

## Billing Contact Information

\*Do you need to update your billing contact?  NO 

 **Billing Contact question response must be YES if status is SOLD.**

## Status of Account

\*What is the status of your account?  SOLD 

\*Sold Date:   (mm/dd/yyyy)

 **Sold Date is required.**

**New owner and contact information must be provided above.**

Next

Cancel

# AEIF Demo: Shutdown

## Account Information

Please complete the questions below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

\* indicates a required field

### –Site/Company Information–

\*Do you need to update your site name or owner name? ? NO

### –Billing Contact Information–

\*Do you need to update your billing contact? ? NO

### –Status of Account–

\*What is the status of your account? ? SHUTDOWN

\*Shutdown Date:   (mm/dd/yyyy)




# AEIF Demo: Merged

## Account Information


Please complete the questions below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

\* indicates a required field


### Site/Company Information

\*Do you need to update your site name or owner name?  YES

### Billing Contact Information

\*Do you need to update your billing contact?  NO

### Status of Account

\*What is the status of your account?  MERGED

\*Merged Date:   (mm/dd/yyyy)

\*New RN:  (Please provide the new RN.)





# AEIF Demo: Inspection Fee Basis SIC Information



## Account Information on File

**RN/Account:** RN101010101/BF1234X  
**Site Name:** CENTRAL TEXAS FACILITY #4  
**CN:** CN612345678  
**Company:** REAL PLASTICS CORP  
**Fiscal Year:** 2027  
**Report Status:** CREATED

**County:** BELL  
**SIC:** 3083  
**Billing Contact:** JOHN DOE  
**Mailing Address:** 1234 REAL STREET  
POST OAK, TX 76503-6110  
**Phone:** 555-555-5555  
**Email:** JOHN.DOE@REALPLASTICS.COM

--Select a SIC--

1311A  
1311B  
1311C  
1321A  
1321B  
1321C  
1459  
1479A  
1479B  
2061  
2074A  
2074B  
2074C  
2082  
2435A  
2435B  
2435C  
2436A  
2436B

## Inspection Fee Basis Information

Please provide the SIC category that has the highest base inspection fee per 30 TAC §101.24(f). Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

For a complete listing of SIC codes, tiers with associated capacity/throughput, and the current fee rate for inspection fees, visit our fees web page: <http://www.tceq.texas.gov/airquality/point-source-ei/air-fees.html>.

If the site will not operate during the reporting FY, or does not have an applicable SIC Code, enter N/A. If N/A, you must provide a comment in the comments section.

\*SIC category that has the highest base inspection fee: ? --Select a SIC-- v

Next Previous Cancel



# AEIF Demo: Emissions Fee Basis Title V Information

## Emissions Fee Basis Information

Please complete the questions below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

\* indicates a required field

\*Is the site required to obtain/possess a Title V permit?: ?

## Emissions

Please complete the emissions section below by entering Allowable **OR** Routine Emissions; in addition to any SMSS and EE. Press **Save** to save the emission data or **Add New** to add another row to the table.

| Regulated Pollutants<br>(Includes all regulated pollutants on site) <span>?</span> | Allowable Emissions Rates<br>(Tons per Year) | ACTUAL EMISSIONS<br>(CY 2025) <span>?</span> |                         |                       | Delete                   |
|--|--|--|-------------------------|-----------------------|--------------------------|
|  |  | Routine<br>(Tons per Year)                   | SMSS<br>(Tons per Year) | EE<br>(Tons per Year) |                          |
| Volatile organic compounds (VOC) <span>?</span>                                    | <input type="text"/>                         | <input type="text"/>                         | <input type="text"/>    | <input type="text"/>  | <input type="checkbox"/> |
| Carbon monoxide (CO)   | <input type="text"/>                         | <input type="text"/>                         | <input type="text"/>    | <input type="text"/>  | <input type="checkbox"/> |
| Nitrogen oxides (NOx)  | <input type="text"/>                         | <input type="text"/>                         | <input type="text"/>    | <input type="text"/>  | <input type="checkbox"/> |
| Sulfur dioxide (SO2)   | <input type="text"/>                         | <input type="text"/>                         | <input type="text"/>    | <input type="text"/>  | <input type="checkbox"/> |
| Particulate matter (PM) total <span>?</span>                                       | <input type="text"/>                         | <input type="text"/>                         | <input type="text"/>    | <input type="text"/>  | <input type="checkbox"/> |
| --Select a Pollutant-- <span>?</span>  | <input type="text"/>                         | <input type="text"/>                         | <input type="text"/>    | <input type="text"/>  | <input type="checkbox"/> |

Add New Save

Next Previous Cancel

# AEIF Demo: Emissions Fee Basis Pollutant Information

3

| Regulated Pollutants<br>(Includes all regulated pollutants on site) ? | Allowable Emissions Rates<br>(Tons per Year) | ACTUAL (CY                 |                      |
|---|--|----------------------------|----------------------|
|   |  | Routine<br>(Tons per Year) | (Tons                |
| Volatile organic compounds (VOC) ?                                    | <input type="text"/>                         | <input type="text"/>       | <input type="text"/> |
| Carbon monoxide (CO)  | <input type="text"/>                         | <input type="text"/>       | <input type="text"/> |
| Nitrogen oxides (NOx)   | <input type="text"/>                         | <input type="text"/>       | <input type="text"/> |
| Sulfur dioxide (SO2)  | <input type="text"/>                         | <input type="text"/>       | <input type="text"/> |
| Particulate matter (PM) total ?                                       | <input type="text"/>                         | <input type="text"/>       | <input type="text"/> |
| <div>2</div> <div>--Select a Pollutant--</div>                        | <input type="text"/>                         | <input type="text"/>       | <input type="text"/> |

1

--Select a Pollutant--

ACETONE (54020)

AMMONIA (70050)

ETHANE (56550)

HYDROCHLORIC ACID (11160)

HYDROFLUORIC ACID (11162)

HYDROGEN CYANIDE GAS (58240)

LEAD (14310)

METHYLENE CHLORIDE (53250)

PERCHLOROETHYLENE (55550)

SULFURIC ACID (11175)

TRICHLOROETHANE (1,1,1) (53290)

CARBONYL SULFIDE (58775)

METHANE (60000)

CHLORINE (70110)

HYDROGEN CHLORIDE (70200)

CARBON DISULFIDE (70225)

HYDROGEN FLUORIDE (70250)

HYDROGEN SULFIDE (70300)

NITROUS OXIDE (70403)

Reminder: All regulated pollutants over 0.1 tpy should be reported for the emissions fee.

# AEIF Demo: Emissions Fee Basis: Actual and Permitted Information

- Reminder: complete the appropriate columns and rows to report emissions for all applicable regulated pollutants on the emissions table.
  - Actual routine, SMSS, and EE emissions **or**
  - Permit allowable, SMSS, and EE emissions
- The actual emissions will not be automatically imported from the EI.

# AEIF Demo: Comments and Attachments

**Comments and Attachments**

Please provide any comments and supplementary documentation and/or emissions calculations below. Press **Next** to continue, **Previous** to return the last page, or **Cancel** to exit the form.

**Comments**

Please provide any comments/explanations about the site that will assist in processing and invoicing the account accurately. Press **Save** when complete.

\* indicates a required field

Comments: ?  (2000-character limit)

Save

**Attachments**

There are 0 attachments.

**Add Attachment**

Select a file and press Upload File to upload supplementary documentation and/or emissions calculations.

\*File to Upload:  No file selected.

\*Does the file contain information considered confidential? NO ▾

Upload File

Next Previous Cancel

# AEIF Demo: Attachments Detail

3

Attachments

There is 1 attachment.

| File Name     | File Hash  | Confidential | Delete |
|---------------|--|--------------|--------|
| FILE_NAME.PDF | A1E5F8FB947524079CB7D260D968DC940D9882A66175AA1EB0A2542756092108 | NO           |        |

Add Attachment

Select a file and press Upload File to upload supplementary documentation and/or emissions calculations.

\*File to Upload

1

Browse...

to file selected.

\*Does the file contain information considered confidential?

NO

2

Upload File

Next

Previous

Cancel

# AEIF Demo: Review

|                                     |  |                              |                         |
|-------------------------------------|--|------------------------------|-------------------------|
| AEIF Fee Basis Form Sign and Submit |  | Account: RN101010101/BF1234X | Today's Date: 2/05/2026 |
|-------------------------------------|--|------------------------------|-------------------------|

**Account Information on File**

**RN/Account:** RN101010101/BF1234X

**Site Name:** CENTRAL TEXAS FACILITY #4

**CN:** CN612345678

**Company:** REAL PLASTICS CORP

**Fiscal Year:** 2027

**Report Status:** CREATED

**County:** BELL

**SIC:** 3083

**Billing Contact:** JOHN DOE

**Mailing Address:** 1234 REAL STREET  
POST OAK, TX 76503-6110

**Phone:** 555-555-5555

**Email:** JOHN.DOE@REALPLASTICS.COM

**Account Information**

**-Site/Company Information**

Do you need to update your site name or owner name? NO

**-Billing Contact Information**

Do you need to update your billing contact? NO

**-Status of Account**

What is the status of your account? ACTIVE

**Inspection Fee Basis Information**

SIC category that has the highest base inspection fee: N/A



# AEIF Demo: Review (cont.)

**Emissions Fee Basis Information**

Is the site required to obtain/possess a Title V permit? YES

**Emissions**

| Regulated Pollutants<br>(Includes all regulated<br>pollutants on site) | Allowable Emissions Rates<br>(Tons per Year) | ACTUAL EMISSIONS           |                         |                       |
|--|--|----------------------------|-------------------------|-----------------------|
|  |  | Routine<br>(Tons per Year) | SMSS<br>(Tons per Year) | EE<br>(Tons per Year) |
| Volatile organic compounds<br>(VOC)                                    | 0  | 75.0300                    | 4.1200                  | 0.9000                |
| Carbon monoxide (CO)   | 0  | 4.0260                     | 0                       | 0                     |
| Nitrogen oxides (NOx)  | 0  | 6.5982                     | 0                       | 0                     |
| Sulfur dioxide (SO2)   | 0  | 0.0500                     | 0                       | 0                     |
| Particulate matter (PM) total  | 0  | 10.9360                    | 0                       | 0                     |
| AMMONIA (70050)  | 0  | 1.7120                     | 0                       | 0                     |
| ACETONE (54020)  | 0  | 14.8480                    | 0.2000                  | 0                     |

Edit

**Comments and Attachments**

**Comments**

Comments: N/A selected because SIC is 3083 and not applicable to Inspection Fee. EI Copy of Record attached

**Attachments**

There is 1 associated attachment.

| File Name       | File Hash  | Confidential | View |
|-----------------|--|--------------|------|
| 2025 EI COR.pdf | 66C6E38F6DDC2CBB902D31F3BC397FCDB712D92F9491076FA6F3A9035AE7D9EF | NO           |      |

Edit

Sign and SubmitCancel



# AEIF Demo: Certification Statement

## Certification

I certify that I have personally examined and am familiar with the information submitted and that based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the submitted information is true, accurate and complete.

By entering my password and pressing the "Confirm Submit" button, I agree that:

1. I am John Doe, the owner of STEERS account ER123456.
2. I have the authority to submit this data on behalf of CN612345678, REAL PLASTICS CORP.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. 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.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
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 certify that the reported fee basis emissions are not less than the actual emissions that occurred at the site per 30 TAC §101.27(f)(1). If the reported emissions on this Air Emissions/Inspection Fee Basis Form are less than the actual emissions in the applicable TCEQ emissions inventory (EI), I understand that TCEQ will use the EI emissions as the basis for the applicable air emissions fee.
9. I am knowingly and intentionally submitting the Air Emissions/Inspection Fee Basis Form for Fiscal Year 2024 (9/1/2023-8/31/2024) per 30 Texas Administrative Code (TAC) §101.24(b) and 101.27(b).

Password:

Do Not Submit

Confirm Submit



# AEIF Demo: Submission Confirmation

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AEIF Fee Basis Form Submission Confirmation   Account: RN101010101/BF1234X   Today's Date: 2/05/2026   20:00



Please print this page.  
This page confirms your submittal to the TCEQ.  
Your confirmation number is 1.  
The security data hash code is  
5FF946A6040048AC8BEB2627425C8E536997E5D1C133DD72EE203572C3FE07AF.  
You will also receive a confirmation e-mail.

**Account Information on File**

**RN/Account:** RN101010101/BF1234X  
**Site Name:** CENTRAL TEXAS FACILITY #4  
**CN:** CN612345678  
**Company:** REAL PLASTICS CORP  
**Fiscal Year:** 2027  
**Report Status:** SUBMITTED

**County:** BELL  
**SIC:** 3083  
**Billing Contact:** JOHN DOE  
**Mailing Address:** 1234 REAL STREET  
POST OAK, TX 76503-6110  
**Phone:** 555-555-5555  
**Email:** JOHN.DOE@REALPLASTICS.COM

**Account Information**

**Site/Company Information**

Do you need to update your site name or owner name? NO

**Billing Contact Information**

Do you need to update your billing contact? NO

**Status of Account**

What is the status of your account? ACTIVE

**Inspection Fee Basis Information**

SIC category that has the highest base inspection fee: N/A

# AEIF Demo: Submission Confirmation (cont.)




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Air Emissions and Inspection Fees (AEIF) Home    Account: RN101010101/BF1234X    Today's Date: 2/05/2026    20:00



Account Information on File

RN/Account: RN101010101/BF1234X

Site Name: CENTRAL TEXAS FACILITY #4

CN: CN612345678

Company: REAL PLASTICS CORP

Fiscal Year: 2027

Report Status: SUBMITTED

County: BELL

SIC: 3083

Billing Contact: JOHN DOE

Mailing Address: 1234 REAL STREET

POST OAK, TX 76503-6110

Phone: 555-555-5555

Email: JOHN.DOE@REALPLASTICS.COM


Air Emissions and Inspection Fee Report

View

The AIR EMISSIONS/INSPECTION FEE BASIS REPORT for **Fiscal Year (FY) 2027** (9/1/2026 – 8/31/2027)  
Per 30 Texas Administrative Code (TAC) §101.24(b) and 101.27(b), this form is **due June 1, 2026**.

For assistance, please reference the Air Fees Webpage:  
<http://www.tceq.texas.gov/airquality/point-source-ei/air-fees.html>.


# AEIF Demo: Obtaining Copy of Record (COR)

 **TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

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**My Account**   **Review Imports**   **Submissions**   **Activity**   **STEERS Home**

Search   Submit   Log



### Search Submissions

Select a program area to search and provide one or more of the additional search criteria to narrow your results. Selecting a program and pressing Update will display the reports and IDs for that particular program area.

**Program Area:** Air Emissions and Inspection Fees Update

**Report Type:** AEIF Fee Basis Form (Select a program or press Update to refresh.)

**ID:**  **or** RN101010101  
RN101010102  
RN101010103 (Select a program or press Update to refresh.)

**Confirmation Number:**

**Reference/Tracking Number:**  AEME Incident or ePermits Reference

**Submitted by Account:**  (ER account)


Narrow your search by entering a date range. This is the date the data was submitted to TCEQ.

**Start Date:**  (mm/dd/yyyy)

**End Date:**  (mm/dd/yyyy)

Search Reset Form Cancel

# AEIF Demo: Obtaining COR


TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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My Account    Review Imports    Submissions    Activity    STEERS Home

Search Results for Submit Log14:50

Search Again    New Search



Your Search Returned 1 Records

1-1 of 1 Records

| <u>Subject</u>      | <u>Submitted</u> ▼ | <u>Processed</u> | <u>Conf.#</u> | <u>Account</u> | <u>Pgm Area ID</u> | <u>Action</u>            |
|---------------------|--------------------|------------------|---------------|----------------|--------------------|--------------------------|
| AEIF Fee Basis Form | 10/17/2025         | 10/17/2025       | 140           | ER123546       | RN101010101        | View COR ▼ <div>Go</div> |

The following search criteria was entered:  
Program Areas: AEIF



# Frequently Asked Questions: Pollutants

- Are PM2.5 and PM10 equal to particulate matter (PM) Total?
  - No. PM2.5 is a subset of PM10, which is a subset of PM Total. Air fees uses PM Total (also known as total suspended particulate or TSP). Total PM is the sum of emissions from all contaminants with a contaminant code in the 1xxxx series.
  - Using PM10 emissions reported in the EI may undercount PM Total.
- Do I need to individually report volatile organic compound (VOC) hazardous air pollutants (HAPs) (formaldehyde, benzene, etc.)?
  - No. Total VOCs should be reported instead of reporting VOC HAPs individually. This VOC number should match the EI.

# Frequently Asked Questions: Inspection Fee and Revisions

- I have an applicable SIC but do not meet capacity/throughput as listed on inspection fee rule. How do I report?
  - Carefully review the fee rule and determine if the site will meet capacity/throughput during the FY. If not, select “N/A” for the SIC and provide a comment explaining why the site does not meet the listed capacity/throughput.
- How do I revise my AEIF after initial submittal in STEERS?
  - Currently, users are unable to submit revised AEIF forms through STEERS. Contact the air fees program to receive the necessary revision forms.



# Frequently Asked Questions: Ownership Changes

- How do I update the ownership for my site in Central Registry?
  - Submit a change of ownership for all Air Permits associated with the RN. Air Permits will then transmit data to the Central Registry.
  - Air Permit contact info: [airperm@tceq.texas.gov](mailto:airperm@tceq.texas.gov) / 512-239-1250

# Contact Information

- Jared Thompson, Natural Resources Specialist
  - [Jared.Thompson@tceq.texas.gov](mailto:Jared.Thompson@tceq.texas.gov)
  - (512)-239-5122
- Air fees helpline and email
  - (512)-239-1773
  - [Airfees@tceq.texas.gov](mailto:Airfees@tceq.texas.gov)
- Fee reporting resources
  - “Frequently Asked Questions”, “Instructions for Completing the Fee Form”, and “Web-based Fee Reporting User’s Guide” documents are available on our webpage: <https://www.tceq.texas.gov/airquality/point-source-ei/air-fees.html>



**Questions?**





# **Web-Emissions Inventory (EI): State of Texas Environmental Electronic Reporting System (STEERS)**

# Overview

- STEERS
- Web-EI
  - Reporting options
    - Upload file
    - Manual update
  - Basic process for each option
- 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 webpage](#)

# What is STEERS?

- Portal for accessing various Texas Commission on Environmental Quality (TCEQ) online reporting programs
  - Annual Emissions Inventory Reporting (AEIR) module aka Web-EI
  - Air Emissions and Inspection Fees (AEIF) module aka Web-Fees
- Manages user accounts
  - Controls access to reporting programs
  - Sets and maintains security functions
- More STEERS information in first presentation
  - What's New for EI and STEERS Basics



# 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.



Data



Forms



Maps



Public Notices



Publications



Records



Webcasts



TCEQ Online Services  
e-Pay, Permits  
Licenses, Reporting  
Filing, Comments

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



How are we doing? Take our  
customer satisfaction survey

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



## 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:



#### 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.
  - These questions will be used later during STEERS login for security and user verification.
- Configure program access during account creation.
  - AEIR or AEIF
  - Each program is configured separately.
- Contact TCEQ STEERS staff with issues on this portion of STEERS.
  - [STEERS@tceq.texas.gov](mailto:STEERS@tceq.texas.gov)
  - (512) 239-6925

# Creating/Updating a STEERS Account: Access and Authorizations

- 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

# 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),
    - Designated Representative (DR), and/or
    - Alternate Designated Representative (ADR); and
  - for non-Title V sites, the managers or personnel with the authority to represent the company or facility.



# STEERS Participation Agreement (SPA)

- Document signed by each STEERS user
  - Paper signature
  - Electronic signature using
    - Valid Texas driver license or
    - LexisNexis InstantID
- 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
- Accounts and changes are on probation until the SPA is processed.



# Common Questions: STEERS

- Who should have AEIR and/or AEIF 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 or AEIF systems?
  - Check the "STEERS Access" section under "My Account."
  - Is anything listed as on "Probation?"
- Submitting a new SPA may address many issues.

# Common Questions: STEERS (cont.)

- How can I remove company personnel who no longer need access to STEERS?
  - Those persons must update their individual STEERS user accounts to remove unneeded access.
  - STEERS staff can assist with updating STEERS user accounts.
- Remember – STEERS can help with STEERS user account issues while EAS can help with AEIR issues.
  - EAS can help troubleshoot STEERS user accounts but may not be able to correct the issue.

# **STEERS-AEIR**

## **Using the Web-EI System**

# Preparing an EI using the AEIR System

- Two reporting options:
  - Upload file
    - Single text file import method
  - Emissions inventory questionnaire (EIQ) entry
    - Manual update option, most used option
- Insignificant emissions change and inapplicability notification letters cannot be submitted through AEIR.
  - 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.



**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

Contact updates through STEERS-AEIR have been temporarily disabled. To update any or all of the STARS Emissions Inventory Contact information please send the relevant changes, including the RN or RNs involved, to the Emissions Assessment Section at [PSINVENT@tceq.texas.gov](mailto:PSINVENT@tceq.texas.gov) with subject line "EI Contact Change".

# STEERS-AEIR Does Not Display Current EI Contact Information

- AEIR can no longer see the current EI contact.
  - AEIR points to an outdated contact directory.
  - IT maintenance is required to redirect AEIR to correct directory.
- The EI contact is the person listed in the State of Texas Air Reporting System (STARS) database.
  - The EI contact is managed by EAS and not through STEERS.
- EI contact is not limited by or tied to users with AEIR access.
- Users with AEIR access can still update and/or submit an EI.
- To verify the EI contact displayed, contact [psinvent@tceq.texas.gov](mailto:psinvent@tceq.texas.gov).



# Upload File Option: Delta File Process

# What is the Delta File Process?

- Delta file as in “change file”
  - Single text file created outside of AEIR
  - Contains all relevant EI data
    - Changes and new data
- Reporting option available for all sites but primarily intended for:
  - Large sites
  - Companies with multiple inventories to report
- Users begin with the posted extract file
  - Last reported EI data extracted from STARS available at:  
<https://www14.tceq.texas.gov/eiex/>

# What is the Delta File Process? (cont.)

- User makes changes and additions to create a delta file
- User uploads delta file into AEIR for data validation
  - Upload is not the same as submitted
  - Upload only imports data into AEIR, company official must still submit file
- Import user notified of any issues with the file
  - Correct errors and import a revised delta file
  - Submit only error-free files (more on submission process later)
- Uploaded data cannot be edited within AEIR
  - Correct errors and make updates outside of STEERS
  - Create and re-upload a new file

# Delta File Resources

- File specification documents are available upon request by emailing [psinvent@tceq.texas.gov](mailto:psinvent@tceq.texas.gov).
- Reference tables and error message troubleshooting file are available on the [Point Source EI webpage](#).



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

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

Contact updates through STEERS-AEIR have been temporarily disabled. To update any or all of the STARS Emissions Inventory Contact information please send the relevant changes, including the RN or RNs involved, to the Emissions Assessment Section at [PSINVENT@tceq.texas.gov](mailto:PSINVENT@tceq.texas.gov) with subject line "EI Contact Change".

**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: Choose File No file chosen

Upload File Cancel



# Text File Format

- ASCII pipe (“|”) delimited text file.
  - Pipe is the shift character on the backslash key.
  - Each row is one piece of data.
- Each row is comprised of 6 fields and 5 delimiters.
  - CRUD – record status indicator: Create, Read, Update, Delete
    - Note the delete function does not exist for STARS delta files.
  - Table – database area: Account-Site, Emission, Activity, Material, Factor, Facility Identification Number (FIN), Emission Point Number (EPN), and Control Identification Number (CIN).
  - Key (aka Business Key) – ID field: regulated entity reference number (RN), FIN label, emissions path, etc.

# Text File Format (cont.)

- Attribute – data element such as physical characteristics or operational parameters
  - Diameter
  - Height
  - Hours (as in annual operating hours)
  - Seasonal percentages
  - Profile
- Value – actual numeric or text value for the specified data element
- Units – units of measure (except for some CIN information, more on this later)

# Sample Text File

```
U|ACCOUNT-SITE|RN123456789|TOT NUM RPT EMISSION EVENTS|0|
U|ACCOUNT-SITE|RN123456789|TOT NUM NONRPT EMISSION EVENTS|0|
U|ACCOUNT-SITE|RN123456789|TOT NUM RPT SMSS EVENTS|0|
U|ACCOUNT-SITE|RN123456789|TOT NUM NONRPT SMSS EVENTS|0|
U|ACCOUNT-SITE|RN123456789|ANNUAL OPACITY EVENT TOTAL|0|
U|FIN|03-TK-156|ANNUAL OPERATING HOURS|8760|
U|FIN|03-TK-156|DAYS PER WEEK|7|
U|FIN|03-TK-156|DIAMETER|44.6|FEET
U|FIN|03-TK-156|FALL PERCENTAGE|25|
U|FIN|03-TK-156|FILL MTHD|U|
U|FIN|03-TK-156|GROUP TYPE|TANKS|
U|FIN|03-TK-156|HEIGHT|40|FEET
U|FIN|03-TK-156|HOURS PER DAY|24|
U|FIN|03-TK-156|NAME|TANK STORAGE|
U|FIN|03-TK-156|NO OF COLUMNS|1|COLUMNS
U|FIN|03-TK-156|PAINT COND|G|
```



Microsoft Excel  
Worksheet

# CRUD Type

- Record status indicator
  - Tells system what to do with the data element
    - E – Extracted, only used by STARS for the starting extract files
      - Cannot be used in any file imported into AEIR
    - A – Add, new records only
      - New FIN/EPN/CIN
      - Not for updating previously blank attribute values
      - All Emission, Activity, Material, and Factors records must be CRUD “A”
    - N – No change
      - For static values or ones that did not change from the previous year
      - Can be used to reduce rows of data and file size (more on this later)
    - U – Update
      - Data element needs to be updated to the indicated value

# CRUD Types (cont.)

- Only one CRUD Type allowed for a given Table/Key combination
  - Cannot mix “U”, “N”, or “A”
  - Example - If one record for a FIN is updated, all included rows must be “U”
    - Even if other data are not actually changing (more on this later)
  - Applies to the Account-Site, FIN, EPN, and CIN sections
- Emission, Activity, Material, and Factor
  - By default, these records must be CRUD Type “A”

# Table

- May represent a single table or a group of connected tables in the STARS database
  - Account-Site – general RN/Account and site information
  - FIN, EPN, CIN – general source and structure information
  - Activity, Material, and Factor – emission factor data, primarily NOx emission factors
  - Emission – specific contaminant, tonnages and ozone season average daily emissions data
- Think of each table as a section of related data in the delta file

# Key

- Business Key or ID field - unique ID used in the STARS database
  - Account-Site – RN
  - FIN, EPN, and CIN – 10-character alphanumeric label
  - Emissions – combination of FIN, EPN, and 5-digit contaminant code
  - Activity, Material, and Factor – combination of FIN label, activity codes, dates, and contaminants



# Attributes

- Attributes – blanket term for most of the data elements (type of data) contained in a delta file
  - FIN, EPN, and CIN parameters
    - Diameter, height, design capacity, etc.
  - Operating schedule
    - Hours per day, days per week, etc.
  - Emissions
    - Annual, ozone, emission events (EE), and scheduled maintenance, start-up, shutdown (SMSS)

# Value and Units

- Value – actual numeric or text value for the preceding attribute
  - Diameter attribute – “15” feet value
  - Profile attribute – “Heater” text value
- Units – units of measure (UOM)
  - Except for CIN pairing numbers (more on this later)
  - UOM are hardcoded in the STARS database
    - Don’t change the extract file’s UOM
      - 10-inch diameter vent – report as 0.83 feet
      - 5,000,000-gallon tank – report as 5,000 thousand gallons (Mgallons)

# Table and Key Field - Emission

- Some key fields are positional keys
  - Multi-part key fields (segments)
- Emission
  - Fixed 25 characters and 3 segments
    - FIN label – position 1-10
    - EPN label – position 11-20
    - Contaminant code – position 21-25
  - Must add spaces to fill the entire portion of each key segment (space padding)
    - Only 2 places do not require space padding to the key segment (more on this later)

A|EMISSION|X316    X316    51460|ANNUAL|0|

**FIN**                      **EPN**                      **Contam**

# Table and Key Field – Emission (cont.)

- It can take multiple rows of data to create a full emission record.

A|EMISSION|X8529A/B X8529A/B 52420|ANNUAL|15.8457|

A|EMISSION|X8529A/B X8529A/B 52420|OZONE|87.3164|

A|EMISSION|X8529A/B X8529A/B 52420|DETERMINATION|B|

A|EMISSION|X8529A/B X8529A/B 52420|MAINTENANCE|0|

A|EMISSION|X8529A/B X8529A/B 52420|UPSET|0|

- However, not all Emission rows are needed.
  - Only Annual, Ozone, and Determination are required (more on this later).

# Table and Key Field - Activity

- Activity – What type of process or action does the source engage in?
  - 20 characters maximum and two segments
    - FIN label – 1-10
    - Process code – 11-20
      - Process codes less than 10 characters do not require space padding to fill all 10 positions.

|            |          |              |                    |
|------------|----------|--------------|--------------------|
| A ACTIVITY | SR8STACK | COMBUSTN     | FROM DATE 20250101 |
| A ACTIVITY | SR8STACK | COMBUSTN     | TO DATE 20251231   |
|            | FIN      | Process code |                    |

# Table and Key Field - Material

- Material – What type of material/fuel did the source use?
  - Primarily a measure of fuel usage
    - Reported as total annual aggregate heat input (code “TOTALHEAT”)
  - Fixed 38 characters and four segments
    - FIN label – 1-10
    - Process code – 11-20, **must be padded out to 10 in this record**
    - Material type – 21-30
    - From date – 21-28

|            |            |                     |                      |                  |                                |
|------------|------------|---------------------|----------------------|------------------|--------------------------------|
| A MATERIAL | SR8STACK   | COMBUSTN            | TOTALHEAT            | 20250101         | MATERIAL QUANTITY 104522 MMBTU |
| A MATERIAL | SR8STACK   | COMBUSTN            | TOTALHEAT            | 20250101         | TO DATE 20251231               |
|            | <b>FIN</b> | <b>Process code</b> | <b>Material type</b> | <b>From date</b> |                                |

# Table and Key Field - Factor

- Factor – Emissions factor for reported emissions
  - 48 characters maximum and 5 segments
    - FIN label – 1-10
    - Process code – 11-20, **must be padded out to 10 in this record**
    - Material type – 21-30
    - From date – 31-38
    - Pollutant class – 39-48, this is not the same as the 5-digit contaminant code
      - **Pollutant class less than 10 characters does not require space padding to fill all 10 positions.**

|          |          |          |           |          |     |                        |
|----------|----------|----------|-----------|----------|-----|------------------------|
| A FACTOR | SR8STACK | COMBUSTN | TOTALHEAT | 20250101 | NOX | FACTOR QUANTITY 0.08   |
| A FACTOR | SR8STACK | COMBUSTN | TOTALHEAT | 20250101 | NOX | NUMERATOR UNIT POUNDS  |
| A FACTOR | SR8STACK | COMBUSTN | TOTALHEAT | 20250101 | NOX | DENOMINATOR UNIT MMBTU |

**FIN      Process Code   Material Type   From Date   Pollutant**



# Table and Key Field – FIN, EPN, and CIN

- The Key is the FIN, EPN, or CIN label.
  - 10-character alphanumeric value
  - Not a positional key, so no space padding needed

|               |                      |                             |
|---------------|----------------------|-----------------------------|
| U FIN HYDRO-A | NAME                 | LOW TEMP. HYDROLYSIS UNIT A |
| U FIN HYDRO-A | PERCENT MAX CAPACITY | 85                          |
| U EPN TK-VENT | NAME                 | KEROSENE STORAGE            |
| U EPN TK-VENT | DIAMETER             | 3 FEET                      |
| U CIN S-SCRUB | NAME                 | SO2 SSCRUBBER               |
| U CIN S-SCRUB | SO2 EFF              | 91                          |

# CIN Pairing numbers

- CINs are connected to an emissions path.
  - Remember, an emissions path is a FIN/EPN combination.
- The Units field indicates the FIN/EPN combination.

U|CIN|A1301|FIN LABEL|HPLANT|1

U|CIN|A1301|EPN LABEL|A1301|1

U|CIN|A1301|FIN LABEL|LPG-1|2

U|CIN|A1301|EPN LABEL|A1301|2

# Minimizing File Size

- Extract files are the starting point and contain all the EI data.
- Not all data are necessary for a valid delta file.
  - Most extract files are a few thousand rows in size.
  - Some extract files for larger facilities are approaching 200,000 rows.
    - Possible to shrink the delta file to less than 35,000 rows
  - The larger the delta file, the longer AEIR/STARS processing takes.
- The only data that must be included are the changes (with a few exceptions).

# Minimizing File Size - Emissions

- An emission record only needs 3 attributes, plus 2 more if applicable
  - Annual
  - Ozone
  - Determination method
  - Plus EE and SMSS, if those emissions occurred
- Other rows from the delta file can be excluded
  - CAS number
  - Contam name
  - EE/SMSS
    - This is not the same as the separate EE and SMSS rows

# Minimizing File Size – FIN, EPN, and CIN

- The only data that must be included are the changes.
  - Example - If FIN seasonal percentages change, then only those four records need to be included:  
U|FIN|006A|FALL PERCENTAGE|24|  
U|FIN|006A|SPRING PERCENTAGE|26|  
U|FIN|006A|SUMMER PERCENTAGE|30|  
U|FIN|006A|WINTER PERCENTAGE|20|
- If a FIN, EPN, or CIN has no changes, then use CRUD type “N”.

# Minimizing File Size – FIN, EPN, and CIN, (cont.)

- All existing FINs, EPNs, and CINs in the extract file must be included in the delta file.
  - If all data for a source are current, correct, and complete (no updates required), then all but one row of data for that source can be excluded.

Extract File

```
E|FIN|01002|ANNUAL OPERATING HOURS|8760|
E|FIN|01002|COMMENT||
E|FIN|01002|DAYS PER WEEK|7|
E|FIN|01002|FALL PERCENTAGE|25|
E|FIN|01002|GROUP TYPE|OTHER|
E|FIN|01002|HOURS PER DAY|24|
E|FIN|01002|NAME|FLASHER 2 HEATER|
E|FIN|01002|PERCENT MAX CAPACITY|75|
E|FIN|01002|PERMIT INDICATOR|O|
E|FIN|01002|PLANT ID||
E|FIN|01002|PROFILE|OTHER|
E|FIN|01002|SCC CODE|10200701|
E|FIN|01002|SCC DESCRIPTION|INDUSTRIAL PROCESS GAS PETROL REFINERY|
E|FIN|01002|SCC NAME|EXTCOMB BOILER|
E|FIN|01002|SPRING PERCENTAGE|25|
E|FIN|01002|START TIME|0000|
E|FIN|01002|STATUS CODE|A|
E|FIN|01002|STATUS DATE|19950101|
E|FIN|01002|SUMMER PERCENTAGE|25|
E|FIN|01002|WEEKS PER YEAR|52|
E|FIN|01002|WINTER PERCENTAGE|25|
```



Delta File

```
N|FIN|01002|NAME|FLASHER 2 HEATER|
```



# Common File Errors: CRUD Type

- CRUD Type Mismatch

```
E|FIN|A3F3143|NAME|#3 DMK FURNACE|  
E|FIN|A3F3143|GROUP TYPE|COMBUSTN|  
E|FIN|A3F3143|PROFILE|FURNACE|  
E|FIN|A3F3143|DESIGN CAPACITY||MMBTU/HR  
E|FIN|A3F3143|DAYS PER WEEK|5|  
E|FIN|A3F3143|FALL PERCENTAGE|14|
```

- Extract file
- Missing design capacity and some outdated values

```
N|FIN|A3F3143|NAME|#3 DMK FURNACE|  
N|FIN|A3F3143|GROUP TYPE|COMBUSTN|  
N|FIN|A3F3143|PROFILE|FURNACE|  
A|FIN|A3F3143|DESIGN CAPACITY|27.9|MMBTU/HR  
U|FIN|A3F3143|DAYS PER WEEK|7|  
U|FIN|A3F3143|FALL PERCENTAGE|25|
```

- Delta file
- Wrong



# Common File Errors: CRUD Type (cont.)

- Correct CRUD Type

```
U|FIN|A3F3143|NAME|#3 DMK FURNACE|  
U|FIN|A3F3143|GROUP TYPE|COMBUSTN|  
U|FIN|A3F3143|PROFILE|FURNACE|  
U|FIN|A3F3143|DESIGN CAPACITY|27.9|MMBTU/HR  
U|FIN|A3F3143|DAYS PER WEEK|7|  
U|FIN|A3F3143|FALL PERCENTAGE|25|
```

- Delta file: **correct**

- Better, shorter version

```
U|FIN|A3F3143|DESIGN CAPACITY|27.9|MMBTU/HR  
U|FIN|A3F3143|DAYS PER WEEK|7|  
U|FIN|A3F3143|FALL PERCENTAGE|25|
```

- Delta file: **also correct**

# Common File Errors: Duplicate Rows

- Duplicate rows of data
  - Status says IMPORT ERROR, but no import error log is generated.
    - Some STEERS logs may reference a “Unique Constraint Violation”.

```
U|EPN|01T913|LATITUDE|294335.72|  
U|EPN|01T913|LONGITUDE|950819.23|  
U|EPN|01T913|LATITUDE|0.00|  
U|EPN|01T913|LONGITUDE|0.00|
```

Delete rows

```
A|EMISSION|2EHLETT 2EHLETT 50001|ANNUAL|8.75|  
A|EMISSION|2EHLETT 2EHLETT 50001|DETERMINATION|A|  
A|EMISSION|2EHLETT 2EHLETT 50001|ANNUAL|1.25|  
A|EMISSION|2EHLETT 2EHLETT 50001|DETERMINATION|A|
```

Combine emissions



```
A|EMISSION|2EHLETT 2EHLETT 50001|ANNUAL|10.0|  
A|EMISSION|2EHLETT 2EHLETT 50001|DETERMINATION|A|
```



# Common File Errors: Numeric Formats

- Some formatting issues can also crash the upload process
  - Do not use scientific notation to report emissions
    - 2.7512x10<sup>2</sup> ✖
    - 275.12 ✔
  - Date format
    - Only use YYYYMMDD format.
      - February 5, 2026 = 20260205

```
A|FIN|01058|STATUS DATE|20250101|  
A|ACTIVITY|SR3/4STACKCOMBUSTN|FROM DATE|20250101|  
A|ACTIVITY|SR3/4STACKCOMBUSTN|TO DATE|20251231|
```

# Common File Errors: Attribute and Characteristic

- Attribute not found
  - Check attribute label spelling
    - Some words are abbreviated or spelled a specific way
      - Check extract file
      - “File Specification” document
      - Reference tables
- Invalid characteristic
  - Attribute exists in system but not used for that group/profile
    - Example – generation capacity (megawatts) is only valid for EGU sources with the following FIN profiles:
      - BOILER-ELECTRIC GENERATN
      - I.C. ENGINE-ELECTRIC GENERATN
      - TURBINE-ELECTRIC GENERATN

# Common File Errors: Attribute and Value

- Attribute has wrong domain
  - Applies to some values that have specific limitations
    - Text in a numeric field, like an emission value
      - Example – emissions values, “one” instead of “1”
- Invalid allowed attribute value
  - Certain attributes can only use a value from a fixed list of acceptable allowed values
  - Example – firing type for certain external combustion sources
    - FR – Front
    - OP – Opposed
    - OT – Other
    - TN – Tangential

# Common Issues and Questions: Delta File

- I don't have an "Upload File" button.
  - Confirm your AEIR account access.
  - Check AEIR to confirm whether the account status is "EXTRACTED".
  - Was the EIQ Entry option accessed?
    - If yes, use the "Clear Work Area" option to reset the AEIR module.

The screenshot displays the STEERS web application interface. At the top, the header includes the Texas Commission on Environmental Quality logo and navigation links for Help, Contact Us, and Logout. Below this is a dark navigation bar with buttons for Clear Work Area, Error Log, Tracking, Work Area, EIQ Entry, RN List, and STEERS Home. The 'Clear Work Area' and 'EIQ Entry' buttons are highlighted with red boxes. The main content area shows 'Air Emissions Inventory Detail' for 'Today's Date: 10/06/2025' at '14:46'. On the right, the STEERS logo is visible. The account details are listed on the left, and a summary box on the right shows the current emissions inventory year as 2025, the last year as 2024, and the status as EXTRACTED. The 'EXTRACTED' status is highlighted with a red box.

| TEXAS COMMISSION ON ENVIRONMENTAL QUALITY |  | Help >>   Contact Us >>   Logout >> |           |          |           |           |  |             |
|---|--|-------------------------------------|-----------|----------|-----------|-----------|--|-------------|
|   |  | Clear Work Area                     | Error Log | Tracking | Work Area | EIQ Entry | RN List                                | STEERS Home |
| Air Emissions Inventory Detail            |  | Today's Date: 10/06/2025            |           |          |           |           | 14:46                                  |             |
| RN Number: RN100250273                    |  |                                     |           |          |           |           | Current Emissions Inventory Year: 2025 |             |
| Account Number: TH0021D                   |  |                                     |           |          |           |           | Last Emissions Inventory Year: 2024    |             |
| Site Name: SOUTH PLANT                    |  |                                     |           |          |           |           | Emissions Inventory Status: EXTRACTED  |             |
| Organization Name: TEST COMPANY INC       |  |                                     |           |          |           |           |  |             |

# Common Questions: Delta File (cont.)

- My file upload failed.
  - Check the error log.
    - If the error log is blank, check for duplicate rows of data or improperly formatted numbers or dates.
- My new file still failed, but the error log did not update.
  - Check that your revisions did not introduce errors that crashed the upload process. An upload crash means the error log won't update.
- What is a FIN, EPN, or CIN count error?
  - All of the existing FIN/EPN/CINs from the extract file are not in your delta file.
  - Common issues
    - Old equipment was left out of the file.
    - Something uses CRUD "A" but already exists, so CRUD should be "U" or "N".
    - Something uses CRUD "U" or "N" but is new, so CRUD should be "A".



# Final Thoughts on Delta File Process

- Best used if your site has a:
  - data system designed for delta file creation, or
  - custom delta file software (TCEQ does not provide the software).
- Delta File is not intended for:
  - small sites, or
  - manual editing of extract files to create a delta file.
- The validation process is very strict.
  - One misplaced space or character will fail an entire file.
  - It is all-or-nothing for data validation.
  - The entire delta file must be error-free to be successfully uploaded and submitted.

# Manual Update Process

## ElQ Entry Option

# What is the EIQ Entry Process?

- Manual update process
  - Similar to completing paper forms
  - Multiple pages grouped into several sections
- Data saved to the AEIR Work Area (WA) as you enter it
- WA - common repository for saved data
  - Only accessible by users with AEIR access to the RN.
- Allows for partial entry and entry over time
  - Not like the all-or-nothing upload of a delta file
- Web-based replacement for the old EIQ paper reporting



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

Contact updates through STEERS-AEIR have been temporarily disabled.  
To update any or all of the STARS Emissions Inventory Contact information please send the relevant changes, including the RN or RNs involved, to the Emissions Assessment Section at [PSINVENT@tceq.texas.gov](mailto:PSINVENT@tceq.texas.gov) with subject line "EI Contact Change".



## Emissions Inventory Questionnaire Entry Search

Today's Date: 10/13/2025



RN Number: RN100250273  
Account Number: TH0021D  
Site Name: SOUTH PLANT  
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2025  
Last Emissions Inventory Year: 0001  
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  
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 ▾  
ACCOUNT-SITE  
FIN  
EPN  
CIN  
EMISSION  
ADD PATH

Table Name structure similar to the Upload File process.  
Each Table can be thought of as a Report Section for  
the EIQ Entry process.



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

## 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"/>    |

Save

Cancel

\* 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, EPN, and CIN sections function the same and will be addressed as one.



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 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

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

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

## 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<br>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                                   |                |                           |

Both must be updated, or both must be left blank

Save Cancel

\* Mandatory field



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 ▾

ACCOUNT-SITE

FIN

EPN

EMISSION

ADD PATH

**Emissions List**

Today's Date: 08/16/2017

14:20



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 FIN or an EPN to update Path Emissions.

1-5 of 5 Records

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

[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  
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 FIN or an EPN to update Path Emissions.

1-5 of 5 Records

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

Cancel

[Add / Delete CINs from Path](#)

Today's Date: 10/13/2025

13:08



RN Number: RN100250273  
Account Number: TH0021D  
Site Name: SOUTH PLANT  
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2025  
Last Emissions Inventory Year: 0001  
Emissions Inventory Status: EXTRACTED

Click Select CIN to go to the CIN selection page. Click Save after all CINs are selected.

**Emissions Detail**

FIN: 01002      Name: CONCRETE BATCH PLANT  
EPN: 1      Name: CONCRETE BATCH PLANT

**Selected CIN(s)**

| CIN | Name | Remove |
|-----|------|--------|
|-----|------|--------|

[Select CIN](#)[Save](#)[Cancel](#)

Select only work for CINs already saved to the WA. Complete the CIN section before addressing CIN structure.



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 ▾

ACCOUNT-SITE

FIN

EPN

CIN

EMISSION

ADD PATH

[Add Path](#)

Today's Date: 10/13/2025

14:39



RN Number: RN100250273  
Account Number: TH0021D  
Site Name: SOUTH PLANT  
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2025  
Last Emissions Inventory Year: 0001  
Emissions Inventory Status: EXTRACTED

Enter a FIN, EPN, and optionally one or more CINs. At least one Contaminant must be added to create the path.

FIN Label \*  -EPN Label \*  -[Select FIN](#)[Select EPN](#)[Select CIN](#) (Optional)

Selected CIN(s)

CIN

Name

Remove

[Add Emissions](#)[Cancel](#)

\* Mandatory field

Select only work for FINs, EPNs, and CINs already saved to the WA. Complete those report sections before creating new paths.



RN Number: RN100250273  
Account Number: TH0021D  
Site Name: SOUTH PLANT  
Organization Name: NOT A REAL COMPANY LLC

Current Emissions Inventory Year: 2025  
Last Emissions Inventory Year: 0001  
Emissions Inventory Status: EXTRACTED

Select a FIN or an EPN to update Path Emissions.

1-4 of 4 Records

| <a href="#">FIN ▲</a> | <a href="#">FIN Name</a> | <a href="#">EPN</a>  | <a href="#">EPN Name</a> | <a href="#">CIN</a> | <a href="#">Work Area Status</a> | <a href="#">Remove</a>                |
|-----------------------|--------------------------|----------------------|--------------------------|---------------------|----------------------------------|---------------------------------------|
| <a href="#">01002</a> | CONCRETE BATCH PLANT     | <a href="#">1</a>    | CONCRETE BATCH PLANT     | <a href="#">N</a>   |                                  |                                       |
| <a href="#">01002</a> | CONCRETE BATCH PLANT     | <a href="#">F-1A</a> | CONCRETE BATCH PLANT     | <a href="#">Y</a>   | Added                            | <input type="button" value="Delete"/> |
| <a href="#">01003</a> | CONCRETE BATCH PLANT     | <a href="#">01</a>   | CONCRETE BATCH PLANT     | <a href="#">Y</a>   |                                  |                                       |
| <a href="#">01004</a> | CONCRETE BATCH PLANT     | <a href="#">F-1A</a> | CONCRETE BATCH PLANT     | <a href="#">Y</a>   |                                  |                                       |

# Common EIQ Entry Issues

- All existing FINs, EPN, and CINs must be addressed.
  - Updated or certified “No Change”
    - Check the relevant report section for any source with blank status.
- Emissions updates are incomplete.
  - Emissions updates can be saved in-progress.
    - Check for the status of error or in-progress.
- Added FINs and EPNs must be used on a new path.
  - Check that new FINs and EPNs show up as a path on the Emissions section.
  - If adding a new CIN, it must be added to a new or existing path.

# **Final Steps: Submitting EI Data**

## **EIQ Entry and Upload File**



# Submitting EI Data

- The data submittal process starts at the AEIR WA.
  - File upload option: users can only access the WA once an error-free file is imported.
  - EIQ entry option: 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 complete and error-free.
- Sample calculations and other supporting documents can be attached at this stage.
- All users with AEIR access to the RN 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 made 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.
  - Non-submit users will not see the submit button.
- **Important: Only the submit users will see the “Submit” button. This button must be clicked and the process completed for the EI data to be submitted to TCEQ.**



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

Contact updates through STEERS-AEIR have been temporarily disabled.  
To update any or all of the STARS Emissions Inventory Contact information please send the relevant changes, including the RN or RNs involved, to the Emissions Assessment Section at [PSINVENT@tceq.texas.gov](mailto:PSINVENT@tceq.texas.gov) with subject line "EI Contact Change".

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   |
| 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

**Attached Supporting Document(s)**

| File Name                                | Hash   | Mime-Type        |
|--|--|------------------|
| <a href="#">Sample Calculations.xlsx</a> | 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 EI Information

- Do not attach **confidential** EI information to AEIR.
- Do not email **confidential** EI information.
- Submit confidential EI information through the secure file transfer protocol (FTPS) web page, mail, or hand deliver.
- EAS prefers that confidential EI information is securely transmitted through the TCEQ FTPS web page <https://ftps.tceq.texas.gov/>.
  - Upload and share with [psdocument@tceq.texas.gov](mailto:psdocument@tceq.texas.gov)
  - Please contact the EAS helpline if you need assistance.



# What Happens After Submittal

- Submitted EI is queued for validation in STARS.
  - AEIR status will change to “processed” after submission.
  - STARS validation occurs daily at 6 PM.
    - This should be a redundant validation since checks already occurred during the file upload and manual entry processes.
  - AEIR status will then update to “validated”.
    - Contact EAS if the status shows “error”.
- AEIR users associated with the RN receive emails after the following:
  - Submission: Email confirms EI data submitted for STARS validation.
  - STARS validation: Confirms TCEQ receipt of EI data, and reporting requirements have been met.
    - Contact EAS if the email states that the validation failed.



# Common Questions: Web-EI

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

# Contact Information: STEERS and EI

- STEERS (non-Web-EI and non-Web-Fee questions):
  - [steers@tceq.texas.gov](mailto:steers@tceq.texas.gov)
  - (512) 239-6925
- EAS helpline: Monday-Friday, 8 AM to 5 PM
  - (512) 239-1773
  - [psinvent@tceq.texas.gov](mailto:psinvent@tceq.texas.gov)
- Adam Bullock, Technical Specialist  
[Adam.Bullock@tceq.texas.gov](mailto:Adam.Bullock@tceq.texas.gov)
- Tim Vinciguerra, Ph.D., Emissions Inventory Specialist  
[Tim.Vinciguerra@tceq.texas.gov](mailto:Tim.Vinciguerra@tceq.texas.gov)



# Questions?





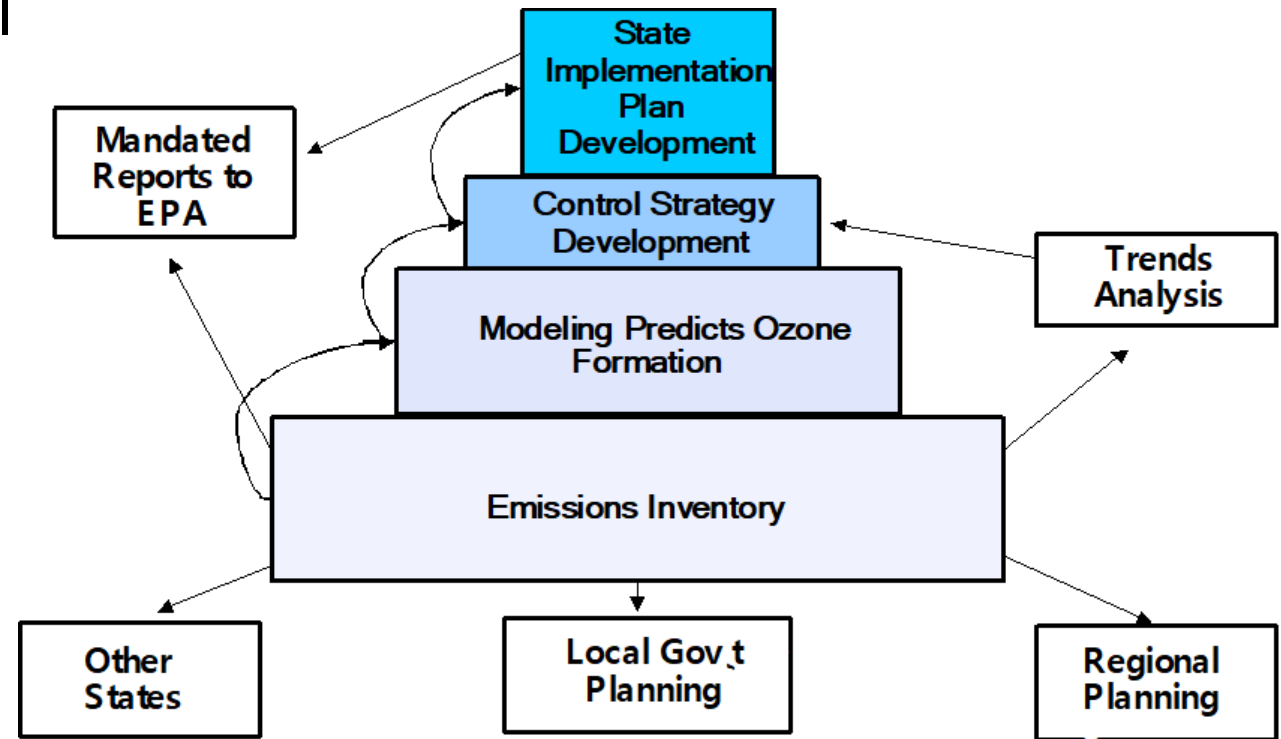
# Sample Calculations and Common Issues

# Overview

- Introduction- Why are accurate emissions inventories (EI) important?
- Part 1 – Types of supporting documentation
- Part 2 – Guidance for specific source types
- Part 3 – Public versus confidential data
- Part 4 – General guidance

# Why are Accurate Els Important?

- Texas Commission on Environmental Quality (TCEQ) uses emissions inventories (EIs) as the basis for various regulatory activities.
- Data are used for airshed modeling and rulemaking activities.
- Data are used to plan pollution control programs and state implementation plan (SIP) revisions.



# Part 1

## Types of Supporting Documentation



# What Supporting Documents Should be Submitted with the EI?

- Specific information about the site and processes
- Sample calculations that support the actual emissions as reported in the current year's EI
- Documentation of the sample calculation inputs
- Documentation when EI differs from air emissions reported to other programs
  - U.S. Environmental Protection Agency's (EPA) Clean Air Markets Program Data
  - EPA's Toxics Release Inventory (TRI)

# Information About the Site and Processes

- Plot plan showing the emissions points
- Process information
  - Written description of the site's operations
  - Process flow diagram(s) that illustrate the connections between the facilities/sources and the emissions points
- Any changes from prior year's EI
  - Significant increase/decrease in emissions
  - Structure changes (shutdowns, control devices added, etc.)

# Sample Calculations

- Sample calculations are required to be reported per 30 Texas Administrative Code (TAC) Section 101.10(c).
- Always use site-specific data if available (rather than defaults).
- Update sample calculations to reflect 2025 calendar year data.

# Sample Calculations (cont.)

- Submit sample calculations for each different process type in the EI.
- Provide sufficient data so the results can be reasonably recreated.
- Sufficient data include:
  - process rates,
  - operating hours, and
  - emissions factors (if AP-42, include chapter and/or table).

# Sample Calculations: Example

**Example: Carbon monoxide (CO) emissions from an internal combustion engine**

$$\frac{3.09 \text{ grams (g) CO}}{\text{horsepower (hp)} - \text{hour (hr)}} \times \frac{7655 \text{ hr}}{\text{year (yr)}} \times \frac{1380 \text{ hp}}{1} \times \frac{\text{pounds (lb)}}{453 \text{ g}} \times \frac{\text{ton}}{2000 \text{ lb}} = 36.03 \frac{\text{ton}}{\text{yr}} \text{ CO emissions}$$

# Sample Calculations: Ozone Season

- Ozone season calculation requirements
  - El Paso County and all counties east of the 100th Meridian
  - Calculated as the average daily release rates during the ozone season of a calendar year—May 1 through September 30
  - Required for each contaminant emitted

# Sample Calculations: Ozone Season (cont.)

**Example: Ozone season calculation, Carbon monoxide (CO) emissions from an internal combustion turbine**

- Annually reported 47.11 ton/yr CO emissions
- Operated 8352 hr annually, but only operated May 1st-September 14th due to shutdown in a planned unit outage (136 days total of ozone season), resuming operations October 1st

Actual emissions during ozone season

Unit conversion

$$\left[ \frac{17.5533 \text{ ton CO}}{\text{year (yr)}} * \frac{2000 \text{ pound (lb)}}{\text{ton}} \right] \div 153 \frac{\text{days}}{\text{yr}} = 229.4549 \frac{\text{lb}}{\text{day}} \text{ (or ppd) CO emissions}$$

Ozone season days per calendar year



# Documentation of the Sample Calculation

## Inputs: Gas Analysis

- Extended gas analysis
  - Site-specific
  - Most current analysis available
  - At minimum, hexanes+/C6+ speciated
  - Include:
    - Benzene
    - Toluene
    - Ethylbenzene
    - Xylene
    - Other applicable hazardous air pollutants

# Documentation of the Sample Calculation

## Inputs: Emissions Factors

- Emissions factors
  - Stack test (provide date)
  - Vendor/manufacturer data
  - AP-42 (which table or section)
  - American Petroleum Institute (API) factors
  - Chemical manufacturing average factors
  - Portable analyzer data

# Documentation of the Sample Calculation Inputs: Other

- Summary reports
  - Include identification of the site, identification of the facility/source, and report date.
- Material throughput
  - Submit site-specific information.

# Summary Reports: Examples

- Relative accuracy test audits for continuous emissions monitoring systems and predictive emissions monitoring systems
  - Hourly output readings
  - Material throughput
  - Date of the test
- Stack test report
  - Results summary page with factors and units
  - Date of the test
  - Process rate during the test
  - Correct nitrogen oxide (NO<sub>x</sub>) molecular weight (46.01 lb/lb-mol)
- Aggregate summary emissions report
  - Gas Research Institute GLYCalc software
  - EPA Tanks 5.1

# El Comparison to TRI

- Toxics data reported to EPA's TRI program should match emissions data reported to the EI.
- Although the TRI program reports emissions from different media (air, waste, etc.), only air emissions from the TRI program and the EI program will be reviewed.
- Always report the most accurate emissions data.
- If the data do not match, provide an explanation and/or revise the EI data, as necessary.

# EI Comparison to AEME

- Regulated pollutants reported to TCEQ's Air Emissions and Maintenance Events (AEME) database should match emissions data reported to the EI.
- If the data do not match, then an explanation and/or revision is required.
- AEME may include contaminants that are not required to be reported in the EI.
  - Only discrepancies for pollutants required to be reported in the EI will be questioned.
  - Emissions event and maintenance, startup, and shutdown emissions should include non-reportable quantities, which means that AEME totals might be less than the EI totals.

# Supporting Documentation Summary

- Submit current, site-specific, and complete supporting data so that the emissions can be verified.
- Supporting documentation includes:
  - equations,
  - specific sample calculations,
  - activity data,
  - emissions factors,
  - source references/citations,
  - assumptions, and
  - summary reports.



# What to Avoid with Supporting Documentation

- Resubmitting previous year's documentation
- Reporting the permit limits rather than calculating current actual emissions
- Listing the permit as the source of an emissions factor

## Part 2

# Guidance for Specific Source Types

# Guidance for Specific Source Types

- Common facility/source types:
  - Flares
  - Storage tanks
  - Loading (truck or marine)
  - Coating and printing
  - Glycol dehydrators
  - Fugitives (equipment leaks)
  - Internal combustion engines

# Sample Calculation Forms

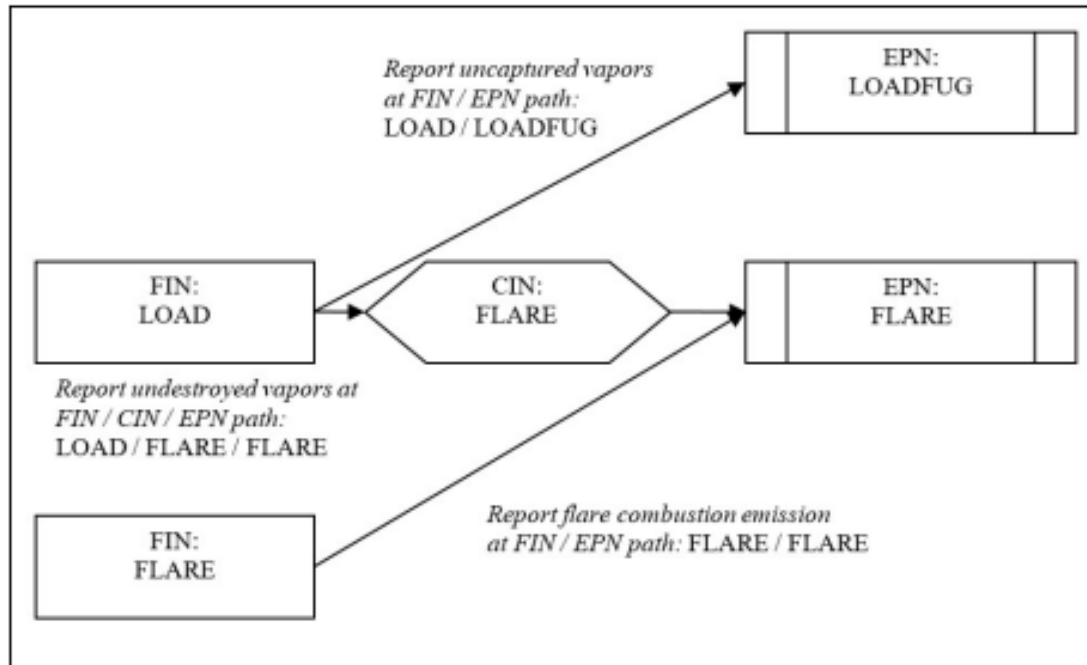
- Revised sample calculation forms are available on the point source EI webpage for the following common emission sources:
  - Glycol dehydration
  - Internal combustion engine
  - Marine vessel loading
  - Railcar and truck loading
  - Storage tanks

# Flares

- Detailed guidance provided on TCEQ's RG-360, Appendix A, Technical Supplement 4: Flares
- Provide sample calculations for the pilot gas and waste gas, and include the following data:
  - Heat inputs
  - Emissions factors and sources
  - Molecular weights
  - Volatile organic compound (VOC) composition
  - Mole fractions
  - Flow rates
  - Destruction efficiencies

# Flares (cont.)

- RG-360, Chapter 3: Emissions Inventory Structure, provides example structure for a process abated by a flare:

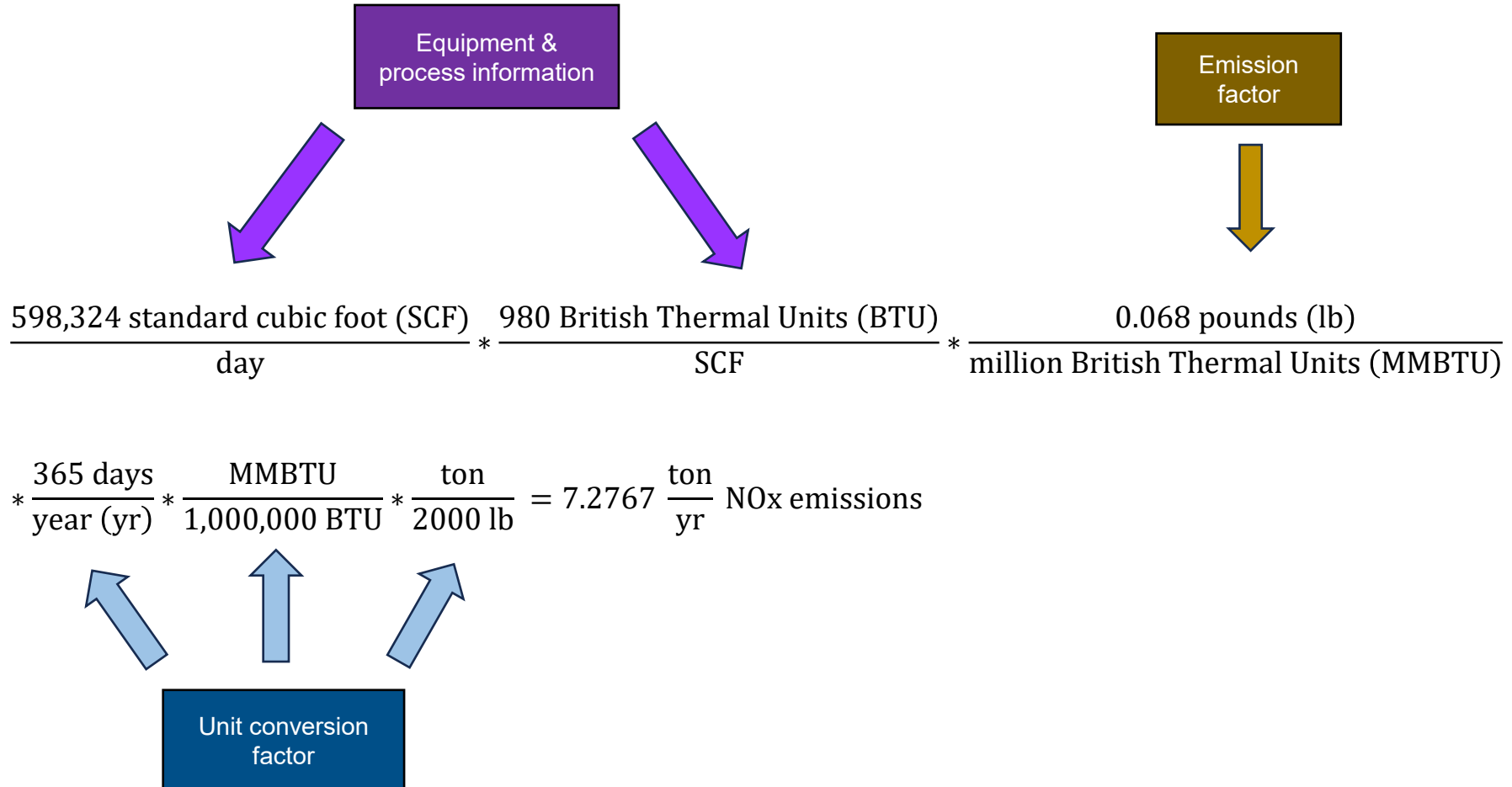


**Figure 3-10. Loading Area Controlled by a Flare**

- Clearly separate the structure in inventory
- Report the emissions on the correct paths

# Flare Calculation

## Example: NO<sub>x</sub> emissions from a flare





# Storage Tanks

- Detailed guidance provided in TCEQ's RG-360, Appendix A, Technical Supplement 6: Aboveground Liquid Storage Tanks.
- If emissions were determined with a software program, then provide the reports and name of the program.
  - Examples: TANKS 5.1, TankESP, and E&P Tank
- If emissions were determined with AP-42, Chapter 7 equations, then provide a spreadsheet with formulas and all input data.
- Provide site-specific input data for floating roof tanks and flash/separator tanks.
- Report working, breathing/standing, and flash losses from tanks.

# Storage Tank Calculations Form: Oil and Gas Production

## Storage Tanks Calculation Template: Oil & Gas Production

- Supply the information included in the table below in your supporting documentation.
- Include the aggregate summary report (if using process simulator).
- Use site-specific data for the current reporting year when calculating emissions.
- Representative data can only be used if site-specific data is not available. Refer to the current year Emissions Inventory (EI) Guidelines at the Point Source website for using representative data: <http://www.tceq.texas.gov/airquality/point-source-ei/psei.html>.
- For further guidance on calculating emissions related to storage tanks, refer to the current year EI Guidelines (Appendix A, Technical Supplement 6, Above Ground Liquid Storage Tanks): <http://www.tceq.texas.gov/airquality/point-source-ei/psei.html>

### Storage Tank Data Table

|   |            |  |
|---|------------|--|
| Company Name:   | Site Name: | RN:                                      |
| FIN:  | EPN:       | CIN:                                     |
| Data Inputs   |            |  |
| Product Stored:   |            |  |
| Method Used for Determining Emissions- working, breathing and flash (Tanks 4.0, Ed&F Tanks, AP-42 Section 7.1, etc.): |            |  |
| Source of gas/oil ratio (GOR) value (measured, simulator, other):   |            |  |
| Reid Vapor Pressure (RVP):  |            |  |
| Controls  |            |  |
| Control Device (if applicable):   |            |  |
| Control Device Efficiency (%):  |            |  |
|   | Value      | Units                                    |
| Stock-Tank API Gravity:   |            | degree API                               |
| Last Stage Separator Pressure:  |            | Pounds per square inch gauge (psig)      |
| Annual Throughput:  |            | Barrels per year (bbl/year)              |
| Volatile Organic Compound (VOC) Fraction of Stock-Tank Gas:   |            | %  |
| Molecular Weight of Stock-Tank Gas:   |            | lb/lb-mole                               |
| GOR:  |            | Standard cubic feet per barrel (scf/bbl) |

\*Note: Please indicate if value is site-specific.

# Storage Tank Data Table

|   |            |  |  |
|---|------------|--|--|
| Company Name:   | Site Name: | RN:                                      |  |
| FIN:  | EPN:       | CIN:                                     |  |
| Data Inputs   |            |  |  |
| Product Stored:   |            |  |  |
| Method Used for Determining Emissions- working, breathing and flash ( <i>Tanks 4.0, E&amp;P Tanks, AP-42 Section 7.1, etc.</i> ): |            |  |  |
| Source of gas/oil ratio (GOR) value (measured, simulator, other) <sup>1</sup> :   |            |  |  |
| Reid Vapor Pressure (RVP) <sup>1</sup> :  |            |  |  |
| Controls  |            |  |  |
| Control Device (if applicable):   |            |  |  |
| Control Device Efficiency (%):  |            |  |  |
|   | Value      | Units                                    | Site-specific or representative data used? |
| Stock-Tank API Gravity:   |            | degree API                               |  |
| Last Stage Separator Pressure:  |            | Pounds per square inch gauge (psig)      |  |
| Annual Throughput:  |            | Barrels per year (bbl/year)              |  |
| Volatile Organic Compound (VOC) Fraction of Stock-Tank Gas <sup>1</sup> :   |            | %  |  |
| Molecular Weight of Stock-Tank Gas:   |            | lb/lb-mole                               |  |
| GOR <sup>1</sup> :  |            | Standard cubic feet per barrel (scf/bbl) |  |

# Storage Tanks Emissions through EPA Software

## TANKS 5.1 <https://tanks.app.cloud.gov/>

- Web browser-based application that estimates VOC and hazardous air pollutant (HAP) emissions from fixed and floating-roof storage tanks
- Saves data in application so it can be imported and exported

### New Tank Details

Required fields are marked with an asterisk \*

Tank Type: \*

Vertical Fixed Roof Tank

Enter Tank Type

Identification

Characteristics

Contents

Save Tank

#### Characteristics

##### Tank Characteristics

Tank Shape: \*

Cylinder

Shell Height (ft): \*

32

Shell Diameter (ft): \*

20

Maximum Liquid Height (ft): \*

Measured from the bottom of the tank shell.

19

Average Liquid Height (ft): \*

Measured from the bottom of the tank shell.

15

#### Contents

##### Tank Contents

Input Type: \*

Enter Annual Values

Chemical Category of Liquid: \*

AP-42 Petroleum Liquids (Table 7.1-2)

Sum of Increases in Liquid Level Method: \*

AP-42 Calculation

Working Loss Turnover Factor Method: \*

AP-42 Calculation

##### Annual Values

Chemical Name: \*

No. 2 Fuel Oil (Diesel)

Annual Throughput (gal/yr): \*

3000

### Example TANKS 5.1 Excel report

|   | A                                     | B                        | C              | D                         | E                       | F                       | G                              | H                             | I                           | J                                  | K                                 | L                               |
|---|---------------------------------------|--------------------------|----------------|---------------------------|-------------------------|-------------------------|--------------------------------|-------------------------------|-----------------------------|------------------------------------|-----------------------------------|---------------------------------|
|   | Tank ID                               | Tank Type                | City, State    | Company                   | Meteorological Location | Chemical Name           | Annual Standing Losses (lb/yr) | Annual Working Losses (lb/yr) | Annual Total Losses (lb/yr) | January Standing Losses (lb/month) | January Working Losses (lb/month) | January Total Losses (lb/month) |
| 1 | TCEQ Presentation Example Diesel Tank | Vertical Fixed Roof Tank | Houston, Texas | TCEQ Presentation Example | Houston, TX             | No. 2 Fuel Oil (Diesel) | 33.67248                       | 0.097613                      | 33.77009                    | 1.2611907                          | 0.0044202                         | 1.2656109                       |
| 2 |                                       |                          |                |                           |                         |                         |                                |                               |                             |                                    |                                   |                                 |

# Loading

- Include:
  - Throughput
  - Vapor pressure
  - Molecular weight
  - Temperature, especially for heated materials
  - Equation used to determine emissions
  - Speciation profile (not from flash gas analysis)
  - Collection or destruction efficiency of a control device, and the basis for the collection or destruction efficiency

# Railcar/Truck Loading Calculation Form

## Railcar and Truck Loading Calculations Template

For each product loaded, complete the information listed below and specify actual values (not permitted values).

For further guidance on Railcar and Truck loading emissions, refer to Section 5.2 of EPA's Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources (AP-42), with supplements (updated continually)—available at [www.epa.gov/ttn/chief/ap42/index.html](http://www.epa.gov/ttn/chief/ap42/index.html)

### Loading Data Summary Table

|   |                |                         |
|---|----------------|-------------------------|
| Company Name:   | Site Name:     | RN:                     |
| FIN:  | EPN:           | CIN:                    |
| Data Inputs   |                |                         |
| Cargo Carrier type (railcar or tank truck):   |                |                         |
| Product Loaded/Unloaded:  |                |                         |
| Mode of Operation (indicate one): <ul style="list-style-type: none"><li>submerged loading of clean cargo tank</li><li>submerged loading of clean cargo truck</li><li>splash loading</li></ul> |                |                         |
| Type of service (indicate one): <ul style="list-style-type: none"><li>dedicated normal service</li><li>dedicated vapor balance</li></ul>  |                |                         |
| Saturation factor (S) used in loading emission calculations:  |                |                         |
|   | Value          | Units                   |
| Volume of product Loaded/Unloaded Annually:   |                | thousands of gallons    |
| Volume of product Loaded/Unloaded May-Sept:   |                | thousands of gallons    |
| True Vapor Pressure of liquid loaded(P):  |                | psia                    |
| Molecular weight of liquid loaded(M):   |                | <del>lb/lbmole</del>    |
| Temperature of bulk liquid loaded:  |                | degrees Fahrenheit (°F) |
| Controls  |                |                         |
| Are loading operations controlled? (yes/no):  |                |                         |
| Vapor collection efficiency (%):  |                |                         |
| Control efficiency of control device (%):   |                |                         |
| List components and their weight fractions in the product loaded (especially benzene, toluene, ethylbenzene, xylene (BTEX), other hazardous air pollutants (HAPs), and air toxics)            |                |                         |
| Component   | Weight percent |                         |
|   |                |                         |
|   |                |                         |
|   |                |                         |
|   |                |                         |

# Railcar/Truck Loading Calculation

## Top of the Form

|  |                   |             |
|--|-------------------|-------------|
| <b>Company Name:</b>   | <b>Site Name:</b> | <b>RN:</b>  |
| <b>FIN:</b>  | <b>EPN:</b>       | <b>CIN:</b> |
| <b>Data Inputs</b>   |                   |             |
| Cargo Carrier type (railcar or tank truck):  |                   |             |
| Product Loaded/Unloaded:   |                   |             |
| Mode of Operation (indicate one):<br><ul style="list-style-type: none"> <li>· submerged loading of clean cargo tank</li> <li>· submerged loading of clean cargo truck</li> <li>· splash loading</li> </ul> |                   |             |
| Type of service (indicate one):<br><ul style="list-style-type: none"> <li>· dedicated normal service</li> <li>· dedicated vapor balance</li> </ul>   |                   |             |
| Saturation factor (S) used in loading emission calculations:   |                   |             |



# Railcar/Truck Loading Calculation

## Bottom of the Form

|   | Value | Units                   |
|---|-------|-------------------------|
| Volume of product Loaded/Unloaded Annually:   |       | thousands of gallons    |
| Volume of product Loaded/Unloaded May-Sept:   |       | thousands of gallons    |
| True Vapor Pressure of liquid loaded(P):  |       | psia                    |
| Molecular weight of liquid loaded(M):   |       | lb/lbmole               |
| Temperature of bulk liquid loaded:  |       | degrees Fahrenheit (°F) |
| <b>Controls</b>   |       |                         |
| Are loading operations controlled? (yes/no):  |       |                         |
| Vapor collection efficiency (%):  |       |                         |
| Control efficiency of control device (%):   |       |                         |
| <b>List components and their weight fractions in the product loaded (especially benzene, toluene, ethylbenzene, xylene (BTEX), other hazardous air pollutants (HAPs), and air toxics)</b> |       |                         |
| Component   |       | Weight percent          |
|   |       |                         |
|   |       |                         |
|   |       |                         |
|   |       |                         |

# Loading Rack Calculation

## Example: VOC emissions from jet fuel loading rack

The diagram illustrates the calculation of VOC emissions from jet fuel loading rack. It features five colored boxes with arrows pointing to the calculation steps:

- Saturation factor** (purple box) points to the value 12.46.
- Liquids information** (brown box) points to the vapor pressure term  $0.60 * 0.008$  pounds per square inch, absolute (psia).
- Loading temperature** (green box) points to the temperature term  $559.67^{\circ}\text{Rankine (}^{\circ}\text{R)}$ .
- Process throughput** (black box) points to the flow rate  $3700 \frac{\text{gal}}{\text{week (wk)}}$ .
- Unit conversion factor** (blue box) points to the conversion factors  $\frac{52 \text{ wks}}{\text{year (yr)}}$  and  $\frac{\text{ton}}{2000 \text{ lb}}$ .

The calculation is as follows:

$$12.46 \frac{\left[ 0.60 * 0.008 \text{ pounds per square inch, absolute (psia)} * 130 \frac{\text{pound (lb)}}{\text{lb - mole}} \right]}{559.67^{\circ}\text{Rankine (}^{\circ}\text{R)}} = 0.0139 \frac{\text{lb}}{1000 \text{ gallon (gal)}}$$
$$0.0139 \frac{\text{lb}}{1000 \text{ gal}} * 3700 \frac{\text{gal}}{\text{week (wk)}} * \frac{52 \text{ wks}}{\text{year (yr)}} * \frac{\text{ton}}{2000 \text{ lb}} = 1.3372 \frac{\text{ton}}{\text{yr}} \text{ VOC emissions}$$

# Marine Vessel Loading Calculation Form

## Marine Vessel Loading Calculations Template

For each product loaded, complete the information listed below and specify actual values (not permitted values).

For further guidance on Marine Vessel Loading emissions, refer to:

Section 5.2 of EPA's Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources (AP-42), with supplements (updated continually)—available at [www.epa.gov/ttn/chief/ap42/index.html](http://www.epa.gov/ttn/chief/ap42/index.html)

Current year Emissions Inventory (EI) Guidelines, Technical Supplement 5, Marine Facilities: <http://www.tceq.texas.gov/airquality/point-source-ei/psei.html>

### Loading Data Summary Table

|  |                |                         |
|--|----------------|-------------------------|
| Company Name:  | Site Name:     | RN:                     |
| FIN:   | EPN:           | CIN:                    |
| Data Inputs  |                |                         |
| Cargo Carrier type (ship or barge):  |                |                         |
| Product Type Loaded/Unloaded:  |                |                         |
| Previous Cargo (indicate one):   |                |                         |
| <ul style="list-style-type: none"> <li>· volatile</li> <li>· nonvolatile</li> </ul>  |                |                         |
| Barge/Ocean Tank Condition (indicate one):   |                |                         |
| <ul style="list-style-type: none"> <li>· Uncleaned</li> <li>· Ballasted</li> <li>· Cleaned or gas freed</li> </ul>   |                |                         |
| Saturation factor (S) used in loading emission calculations:   |                |                         |
| Arrival factor (CA) used in loading emission calculations:   |                |                         |
|  | Value          | Units                   |
| Volume of product loaded/unloaded annually:  |                | thousands of gallons    |
| Volume of product loaded/unloaded May-Sept:  |                | thousands of gallons    |
| True Vapor Pressure of loaded product (P):   |                | psia                    |
| Molecular weight of vapors (M):  |                | lb/lbmole               |
| Temperature of vapors:   |                | degrees Fahrenheit (°F) |
| Controls   |                |                         |
| Are loading operations controlled? (yes/no):   |                |                         |
| Vapor collection efficiency (%):   |                |                         |
| Control efficiency of control device (%):  |                |                         |
| List components and their weight fractions in the product loaded (especially benzene, toluene, ethylbenzene, xylene (BTEX), other hazardous air pollutants (HAPs), and air toxics) |                |                         |
| Component  | Weight percent |                         |
|  |                |                         |
|  |                |                         |
|  |                |                         |

# Marine Vessel Loading Calculation

## Top of the Form

|  |                   |             |
|--|-------------------|-------------|
| <b>Company Name:</b>   | <b>Site Name:</b> | <b>RN:</b>  |
| <b>FIN:</b>  | <b>EPN:</b>       | <b>CIN:</b> |
| <b>Data Inputs</b>   |                   |             |
| Cargo Carrier type (ship or barge):  |                   |             |
| Product Type Loaded/Unloaded:  |                   |             |
| Previous Cargo (indicate one):<br><ul style="list-style-type: none"> <li>· volatile</li> <li>· nonvolatile</li> </ul>  |                   |             |
| Barge/Ocean Tank Condition (indicate one):<br><ul style="list-style-type: none"> <li>· Uncleaned</li> <li>· Ballasted</li> <li>· Cleaned or gas freed</li> </ul> |                   |             |
| Saturation factor (S) used in loading emission calculations:   |                   |             |
| Arrival factor (CA) used in loading emission calculations:   |                   |             |

# Marine Vessel Loading Calculation

## Bottom of the Form

|   | Value          | Units                   |
|---|----------------|-------------------------|
| Volume of product loaded/unloaded annually:   |                | thousands of gallons    |
| Volume of product loaded/unloaded May-Sept:   |                | thousands of gallons    |
| True Vapor Pressure of loaded product (P):  |                | psia                    |
| Molecular weight of vapors (M):   |                | lb/lbmole               |
| Temperature of vapors:  |                | degrees Fahrenheit (°F) |
| <b>Controls</b>   |                |                         |
| Are loading operations controlled? (yes/no):  |                |                         |
| Vapor collection efficiency (%):  |                |                         |
| Control efficiency of control device (%):   |                |                         |
| <b>List components and their weight fractions in the product loaded (especially benzene, toluene, ethylbenzene, xylene (BTEX), other hazardous air pollutants (HAPs), and air toxics)</b> |                |                         |
| Component   | Weight percent |                         |
|   |                |                         |
|   |                |                         |
|   |                |                         |

# Coating and Printing

- Include:
  - Material throughput including the type and amount of material used and VOC content
  - Material balance formulas used to determine VOC and particulate matter emissions
  - Material safety data sheets for the materials most frequently used
  - Control or capture efficiencies

# Glycol Dehydrators

- Include:
  - Actual glycol flow rate and actual gas throughput for current year (not permitted values)
  - Regenerator control device information
  - *Extended* wet gas analysis required (composition upstream of absorber)
    - *Not* a sales gas analysis, since hexanes+/C6+ and HAPs such as benzene are excluded



# Glycol Dehydrator Sample Calculation Form

## Glycol Dehydration Calculations Template (2 pages)

As part of the supporting documentation, include the aggregate summary report and summary of input values. A few of the necessary inputs include the following:

- Actual glycol flow rate and actual gas throughput for current year (not permitted values)
- Extended wet gas analysis (composition upstream of absorber), speciated to include benzene, toluene, ethylbenzene, and xylene (BTEX) and hydrocarbons through C<sub>6</sub>.
  - o do not use sales gas analyses
  - o use a site-specific extended analysis with BTEX of the wet gas prior to the glycol contactor
- Regenerator control device information: condenser temperature and pressure at discharge to atmosphere, and/or combustion device fuel and air rates.

For further guidance on glycol dehydration units, refer to the current year Emissions Inventory Guidelines (Appendix A, Miscellaneous VOC Sources, Glycol Dehydration Operations):

<http://www.tceq.texas.gov/airquality/point-source-ei/psei.html>

## Glycol Data Summary Tables

| Company Name:                           | Site Name: | EN:   |
|---|------------|---|
| FIN:                                    | EPN:       | CEN:  |
| Glycol Operations Data Inputs           | Value      | Units   |
| Type Of Glycol Used:                    |            |   |
| Annual Hours of Operation:              |            |   |
| Emission Calculation Method:            |            |   |
| Contactor Temperature:                  |            | Degrees Fahrenheit (°F)                         |
| Contactor Pressure:                     |            | Pounds per square inch gauge (psig)             |
| Location At Site Where Gas Was Sampled: |            |   |
| Pump Type:                              |            |   |
| Dry Gas Flow Rate:                      |            | Million standard cubic feet per day (MMSCF/Day) |
| Lean Glycol Flow Rate:                  |            | Gallons per minute (gpm)                        |
| Flash Tank Pressure:                    |            | psig  |
| Flash Tank Temperature:                 |            | °F  |

| Wet Gas Composition | Concentration (vol %, dry basis) |
|---------------------|----------------------------------|
| Carbon Dioxide      |                                  |
| Nitrogen            |                                  |
| Methane             |                                  |
| Ethane              |                                  |
| Propane             |                                  |
| Benzene             |                                  |

|              |  |
|--------------|--|
| Toluene      |  |
| Ethylbenzene |  |
| Xylene       |  |
| n-butane     |  |
| n-pentane    |  |
| n-hexane     |  |
| Isobutene    |  |
| Isopentane   |  |

| Controls<br>(Complete for applicable control(s) at site)                                     |  |
|--|--|
| Flash Tank Controls  |  |
| Flash Tank (Yes/No):   |  |
| Control Type (if Applicable):  |  |
| Control Device Efficiency (if Applicable):   |  |
| Regenerator Control  |  |
| Regenerator Control Type -condenser, combustion, or both (complete applicable fields below): |  |
| Condenser  |  |
| Temperature:   |  |
| Pressure:  |  |
| Control Curves (if used, attach low, high, and increment temperatures):                      |  |
| Combustion   |  |
| Type (incinerator, flare, or thermal oxidizer):  |  |
| Control Device Efficiency:   |  |
| Reboiler   |  |
| % of Time Burner Is On:  |  |
| % of Time Heat Input > Maximum Heat Input of Burner:   |  |
| Recycle/Recompress   |  |
| % of Time System Is Down:  |  |



# Glycol Dehydrator Sample Calculation

## Top of the Form

| Company Name:                           | Site Name: | RN:   |
|---|------------|---|
| FIN:                                    | EPN:       | CIN:  |
| Glycol Operations Data Inputs           | Value      | Units   |
| Type Of Glycol Used:                    |            |   |
| Annual Hours of Operation:              |            |   |
| Emission Calculation Method:            |            |   |
| Contactor Temperature:                  |            | Degrees Fahrenheit (°F)                         |
| Contactor Pressure:                     |            | Pounds per square inch gauge (psig)             |
| Location At Site Where Gas Was Sampled: |            |   |
| Pump Type:                              |            |   |
| Dry Gas Flow Rate:                      |            | Million standard cubic feet per day (MMSCF/Day) |
| Lean Glycol Flow Rate:                  |            | Gallons per minute (gpm)                        |
| Flash Tank Pressure:                    |            | psig  |
| Flash Tank Temperature:                 |            | °F  |

# Glycol Dehydrator Sample Calculation

## Bottom of the Form

| Wet Gas Composition | Concentration (vol %, dry basis) |
|---------------------|----------------------------------|
| Carbon Dioxide      |                                  |
| Nitrogen            |                                  |
| Methane             |                                  |
| Ethane              |                                  |
| Propane             |                                  |
| Benzene             |                                  |
| Toluene             |                                  |
| Ethylbenzene        |                                  |
| Xylene              |                                  |
| n-butane            |                                  |
| n-pentane           |                                  |
| n-hexane            |                                  |
| Isobutene           |                                  |
| Isopentane          |                                  |

# Glycol Dehydrator Sample Calculation

## Bottom of the Form (cont.)

| Controls<br>(Complete for applicable control(s) at site)                                     |  |
|--|--|
| <b>Flash Tank Controls</b>   |  |
| Flash Tank (Yes/No):   |  |
| Control Type (If Applicable):  |  |
| Control Device Efficiency (If Applicable):   |  |
| <b>Regenerator Control</b>   |  |
| Regenerator Control Type -condenser, combustion, or both (complete applicable fields below): |  |
| Condenser  |  |
| Temperature:   |  |
| Pressure:  |  |
| Control Curves (if used, attach low, high, <u>and</u> <u>increment</u> temperatures):        |  |
| Combustion   |  |
| Type (incinerator, flare, or thermal oxidizer):  |  |
| Control Device Efficiency:   |  |
| <b>Reboiler</b>  |  |
| % of Time Burner Is On:  |  |
| % of Time Heat Input > Maximum Heat Input of Burner:   |  |
| <b>Recycle/Recompress</b>  |  |
| % of Time System Is Down:  |  |

# Glycol Dehydrator Emissions Software

- Commonly used software available for licensing
- Simulates process environments and computes emissions, requiring user input for various site-specific feed and production information
- Site can provide input and emissions reports

## Wet Gas Analysis

| Component         | Conc. (vol %) |
|-------------------|---------------|
| Carbon Dioxide    | 2.068         |
| Hydrogen Sulfide  | 0.001         |
| Nitrogen          | 0.334         |
| Methane           | 92.763        |
| Ethane            | 3.052         |
| Propane           | 0.722         |
| Isobutane         | 0.188         |
| n-Butane          | 0.211         |
| Isopentane        | 0.109         |
| n-Pentane         | 0.064         |
| n-Hexane          | 0.043         |
| Cyclohexane       | 0.020         |
| Other Hexanes     | 0.090         |
| Heptanes          | 0.102         |
| Methylcyclohexane | 0.027         |
| Benzene           | 0.045         |
| Toluene           | 0.045         |
| Ethylbenzene      | 0.002         |
| Xylenes           | 0.018         |
| C8+ Heavies       | 0.097         |

## Equipment information

### LEAN GLYCOL:

Glycol Type: TEG  
 Water Content: 1.5 wt% H2O  
 Recirculation Ratio: 4.5 gal/lb H2O

### PUMP:

Glycol Pump Type: Electric/Pneumatic

### FLASH TANK:

Flash Control: Vented to atmosphere  
 Temperature: 100.0 deg. F  
 Pressure: 50.0 psig

### STRIPPING GAS:

Source of Gas: Dry Gas  
 Gas Flow Rate: 3.000 scfm

## Excerpt of Final Emissions Report

### CONTROLLED REGENERATOR EMISSIONS

| Component                   | lbs/hr  | lbs/day | tons/yr |
|-----------------------------|---------|---------|---------|
| Hydrogen Sulfide            | 0.0110  | 0.263   | 0.0480  |
| Methane                     | 7.6129  | 182.710 | 33.3445 |
| Ethane                      | 0.7788  | 18.690  | 3.4109  |
| Propane                     | 0.4087  | 9.810   | 1.7903  |
| Isobutane                   | 0.1713  | 4.111   | 0.7503  |
| n-Butane                    | 0.2278  | 5.467   | 0.9977  |
| Isopentane                  | 0.0833  | 2.000   | 0.3650  |
| n-Pentane                   | 0.0632  | 1.517   | 0.2769  |
| n-Hexane                    | 0.0388  | 0.931   | 0.1699  |
| Cyclohexane                 | 0.0592  | 1.422   | 0.2594  |
| Other Hexanes               | 0.0813  | 1.951   | 0.3561  |
| Heptanes                    | 0.0783  | 1.878   | 0.3428  |
| Methylcyclohexane           | 0.0515  | 1.236   | 0.2256  |
| Benzene                     | 0.7418  | 17.803  | 3.2491  |
| Toluene                     | 0.4044  | 9.706   | 1.7714  |
| Ethylbenzene                | 0.0084  | 0.202   | 0.0369  |
| Xylenes                     | 0.0805  | 1.931   | 0.3525  |
| C8+ Heavies                 | 0.0019  | 0.046   | 0.0083  |
| Total Emissions             | 10.9031 | 261.674 | 47.7556 |
| Total Hydrocarbon Emissions | 10.8921 | 261.411 | 47.7076 |
| Total VOC Emissions         | 2.5005  | 60.011  | 10.9521 |
| Total HAP Emissions         | 1.2739  | 30.574  | 5.5797  |
| Total BTEX Emissions        | 1.2351  | 29.643  | 5.4099  |

# Fugitives (Equipment Leaks)

- Include:
  - Representative sample calculations for each fugitive area
  - VOC content of the gas/vapor and/or light liquid stream
  - Breakdown of emissions between monitored and non-monitored components
  - For monitored components:
    - Sample calculations for one leaking and one pegged component for each component type
    - Concentration readings throughout the year, the dates of the readings, and the calculated emissions

# Fugitives (Equipment Leaks) Calculations

- Provides detailed information about the process and site-related parameters
- Form available upon request, but information can also be provided in spreadsheet

| Fugitive Data Form   |                            |                      |                      |   |                   |               |                      |
|--|----------------------------|----------------------|----------------------|---|-------------------|---------------|----------------------|
| TCEQ Emissions Inventory Year _____  |                            |                      |                      |   |                   |               |                      |
| TCEQ Air Account Number: _____   |                            |                      |                      |   | FIN: _____        |               |                      |
| COMPONENT COUNTS   |                            |                      |                      |   |                   |               |                      |
|  | Service                    | Unmonitored          | Monitored            |   |                   |               |                      |
|  |                            | Number of components | Number of components | Leak definition (ppm)                       | Number of leakers | Number pegged | Monitoring frequency |
| Valves   | Gas/Vapor                  | 27                   |                      |   |                   |               |                      |
|  | Light liquid               | 142                  |                      |   |                   |               |                      |
|  | Heavy liquid               |                      |                      |   |                   |               |                      |
|  | H <sub>2</sub> O/Light oil |                      |                      |   |                   |               |                      |
| VOC PERCENTAGES  |                            |                      |                      | MONITORING EQUIPMENT DATA                   |                   |               |                      |
| Gas/vapor stream: 88.21 %  |                            |                      |                      | Pegged Component Screening Value: _____ ppm |                   |               |                      |
| Light liquid stream: 100 %   |                            |                      |                      | Calibration Range: _____ min _____ max      |                   |               |                      |
| EMISSIONS DETERMINATION METHODOLOGY OR LDAR PROGRAM USED   |                            |                      |                      |   |                   |               |                      |
| <input type="checkbox"/> Oil and Gas Factors <input checked="" type="checkbox"/> SOCMi Average Factors <input type="checkbox"/> SOCMi without Ethylene Factors<br><input type="checkbox"/> Refinery Factors <input type="checkbox"/> SOCMi with Ethylene Factors <input type="checkbox"/> Correlation Equations<br><input type="checkbox"/> Petroleum Marketing Terminal Factors <input type="checkbox"/> Other (explain): _____ |                            |                      |                      |   |                   |               |                      |
| LDAR PROGRAM: <input checked="" type="checkbox"/> None <input type="checkbox"/> 28M <input type="checkbox"/> 28RCT <input type="checkbox"/> 28VHP <input type="checkbox"/> 28MID <input type="checkbox"/> 28LAER<br><input type="checkbox"/> AVO <input type="checkbox"/> 28CNTA <input type="checkbox"/> 28CNTQ <input type="checkbox"/> HRVOC <input type="checkbox"/> Other: _____  |                            |                      |                      |   |                   |               |                      |

Example information in spreadsheet

| Fugitive Data (SOCMI AVG, no LDAR) |           |       |                  |        |           |           |
|------------------------------------|-----------|-------|------------------|--------|-----------|-----------|
| Equipment/Service                  | Component | Hours | SOCMI AVG Factor | VOC %  | Emissions | Emissions |
|                                    | Count     |       | lb/hr/comp       |        | lb/year   | tons/year |
| Valves                             |           |       |                  |        |           |           |
| Gas/Vapor                          | 16        | 8760  | 0.0132           | 85.00  | 1572.5952 | 0.7863    |
| Light Liquid                       | 79        | 8760  | 0.0089           | 100.00 | 6159.1560 | 3.0796    |



# Internal Combustion Engines

- Include:
  - Heat input
  - Engine type
    - Rich or lean burn
    - Two- or four-stroke
    - Turbine
  - Emissions factors (provide source)

# Internal Combustion Engine Sample Calculation Form

## Internal Combustion Engine Calculations Template

- For stack test or vendor factors, include the stack test summary or the vendor data page in supporting documentation.
- Do not use "permit" as a factor's reference.
- Include volatile organic compounds (VOC) speciation (with hazardous air pollutants (HAPs) or toxics  $\geq 0.1$  tpy, such as formaldehyde).
- For further guidance on internal combustion engine emissions, refer to the current year Emissions Inventory (EI) Guidelines (Appendix A, Technical Supplement 1, Selected Combustion Sources): <http://www.tceq.texas.gov/airquality/point-source-ei/psei.html>.

## Internal Combustion Engine Data

|  |                                     |   |
|--|-------------------------------------|---|
| Company Name:  | Site Name:                          | RN:   |
| FIN:   | EPN:                                | CIN:  |
| <b>Internal Combustion Engine Data</b>                         | <b>Value</b>                        | <b>Units</b>  |
| Engine Type <sup>1</sup> :                                     |                                     | n/a   |
| Annual Operating Hours:  |                                     |   |
| Ozone Season Operating Hours:                                  |                                     |   |
| Annual Heat Input:   |                                     | Million British thermal units per year (MMBtu/yr)       |
| Ozone Season (May 1 -September 30) Heat Input:                 |                                     | MMBtu   |
| Braking Horsepower:  |                                     | Brake horsepower (bhp)                                  |
| Heat value:  |                                     | British thermal units per standard cubic foot (Btu/scf) |
| Brake Specific Fuel Consumption:                               |                                     | British thermal units per horsepower hour (Btu/hp-hr)   |
| Number of Stacks:  |                                     | Not applicable  |
| <b>Controls (e.g. catalytic converter, catalytic oxidizer)</b> |                                     |   |
| Control Device (if applicable):                                |                                     |   |
| Control Device Efficiency (%):                                 | Nitrogen Oxides (NO <sub>x</sub> ): | Carbon Monoxide (CO):                                   |
|  |                                     | VOC:  |

## Emissions Factors

| Pollutant  | Factor | Units | Method/Reference <sup>2</sup> |
|--|--------|-------|-------------------------------|
| NO <sub>x</sub>  |        |       |                               |
| CO   |        |       |                               |
| VOC  |        |       |                               |
| Formaldehyde   |        |       |                               |
| Sulfur Dioxide (SO <sub>2</sub> )  |        |       |                               |
| Particulate matter less than or equal to 2.5 microns <sup>3</sup> (PM <sub>2.5</sub> ) |        |       |                               |

<sup>1</sup>Engine Type: 2 or 4 stroke and rich or lean burn; turbine

<sup>2</sup>Method/Reference: AP-42 Section 3.2; Stack Test w/ date; Vendor data; portable analyzer, etc.

<sup>3</sup>Factor should be the sum of condensable and filterable particulate. For liquid and gaseous combustion, PM=PM<sub>10</sub>+PM<sub>2.5</sub>.

# Internal Combustion Engine Sample Calculation Top of the Form

|  |                                     |   |      |
|--|-------------------------------------|---|------|
| Company Name:  | Site Name:                          | RN:   |      |
| FIN:   | EPN:                                | CIN:  |      |
| <b>Internal Combustion Engine Data</b>                         | <b>Value</b>                        | <b>Units</b>  |      |
| Engine Type <sup>1</sup> :                                     |                                     | n/a   |      |
| Annual Operating Hours:  |                                     |   |      |
| Ozone Season Operating Hours:                                  |                                     |   |      |
| Annual Heat Input:   |                                     | Million British thermal units per year (MMBtu/yr)       |      |
| Ozone Season (May 1 -September 30) Heat Input:                 |                                     | MMBtu   |      |
| Braking Horsepower:  |                                     | Brake horsepower (bhp)                                  |      |
| Heat value:  |                                     | British thermal units per standard cubic feet (Btu/scf) |      |
| Brake Specific Fuel Consumption:                               |                                     | British thermal units per horsepower hour (Btu/hp-hr)   |      |
| Number of Stacks:  |                                     | Not applicable  |      |
| <b>Controls (e.g. catalytic converter, catalytic oxidizer)</b> |                                     |   |      |
| Control Device (if applicable):                                |                                     |   |      |
| Control Device Efficiency (%):                                 | Nitrogen Oxides (NO <sub>x</sub> ): | Carbon Monoxide (CO):                                   | VOC: |

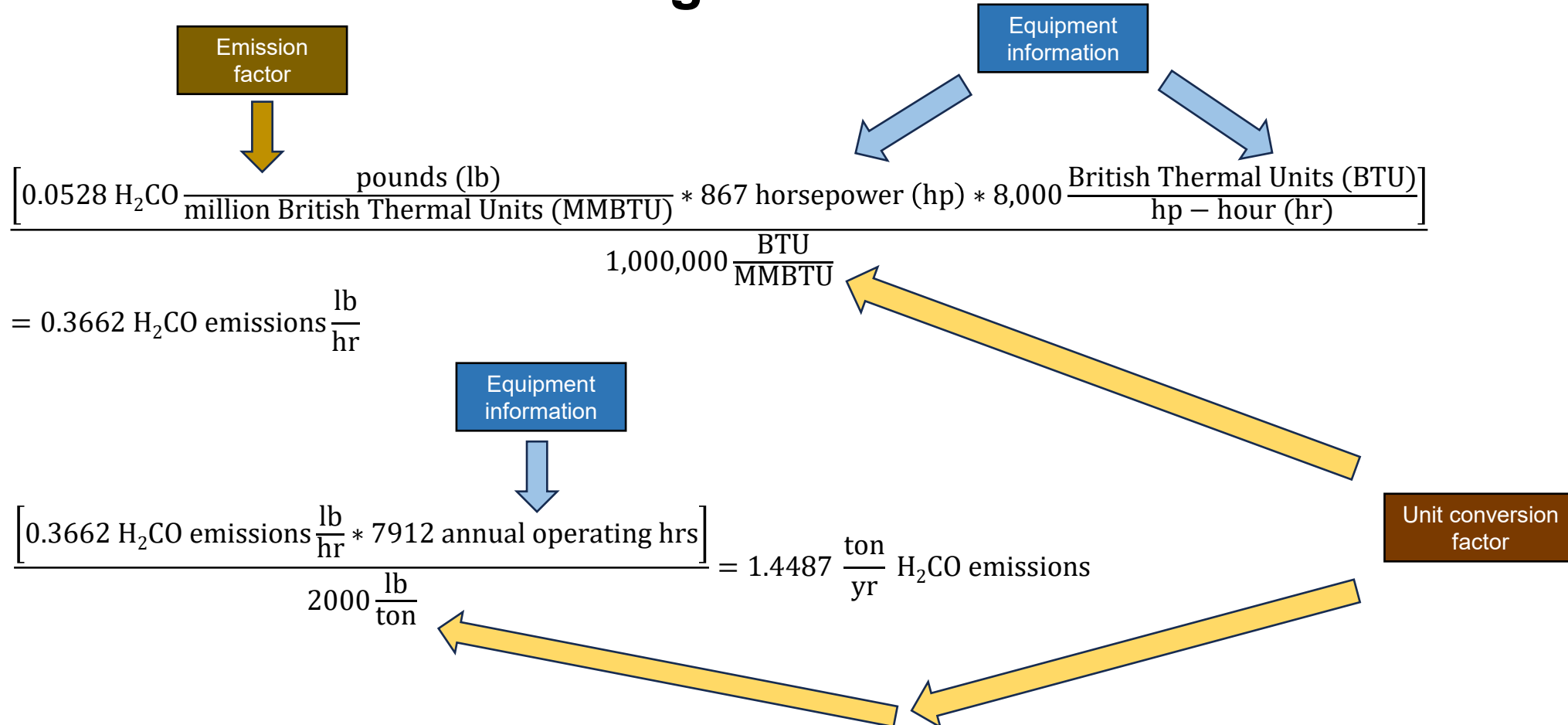
# Internal Combustion Engine Sample Calculation Bottom of the Form

## Emissions Factors

| Pollutant  | Factor | Units | Method/Reference <sup>2</sup> |
|--|--------|-------|-------------------------------|
| NO <sub>x</sub>  |        |       |                               |
| CO   |        |       |                               |
| VOC  |        |       |                               |
| Formaldehyde   |        |       |                               |
| Sulfur Dioxide (SO <sub>2</sub> )  |        |       |                               |
| Particulate matter less than or equal to 2.5 microns <sup>3</sup> (PM <sub>2.5</sub> ) |        |       |                               |

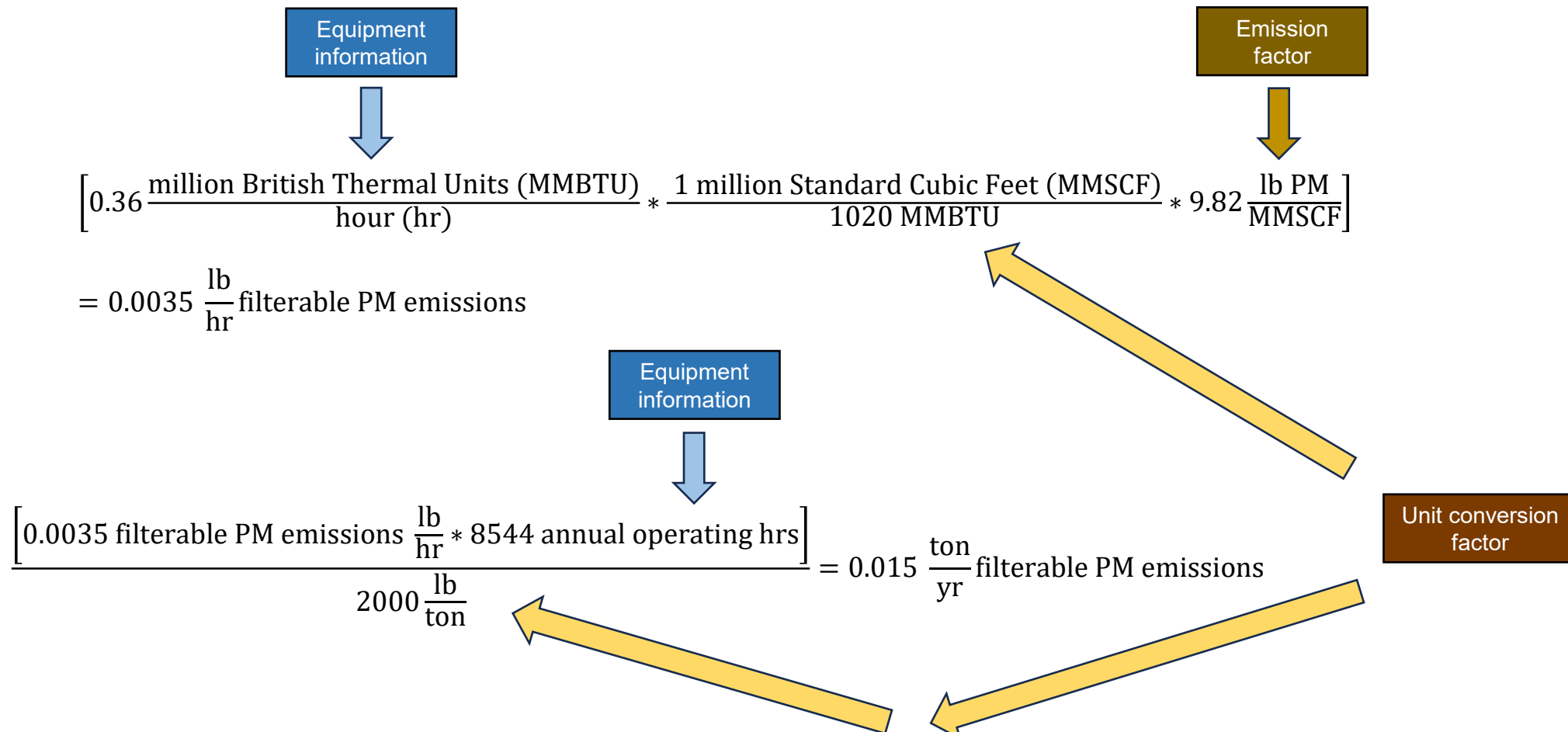
# Internal Combustion Engine Calculation

## Example: Formaldehyde (H<sub>2</sub>CO) emissions from an internal combustion engine



# Boiler Calculation

## Example: Filterable particulate matter (PM) emissions from a boiler



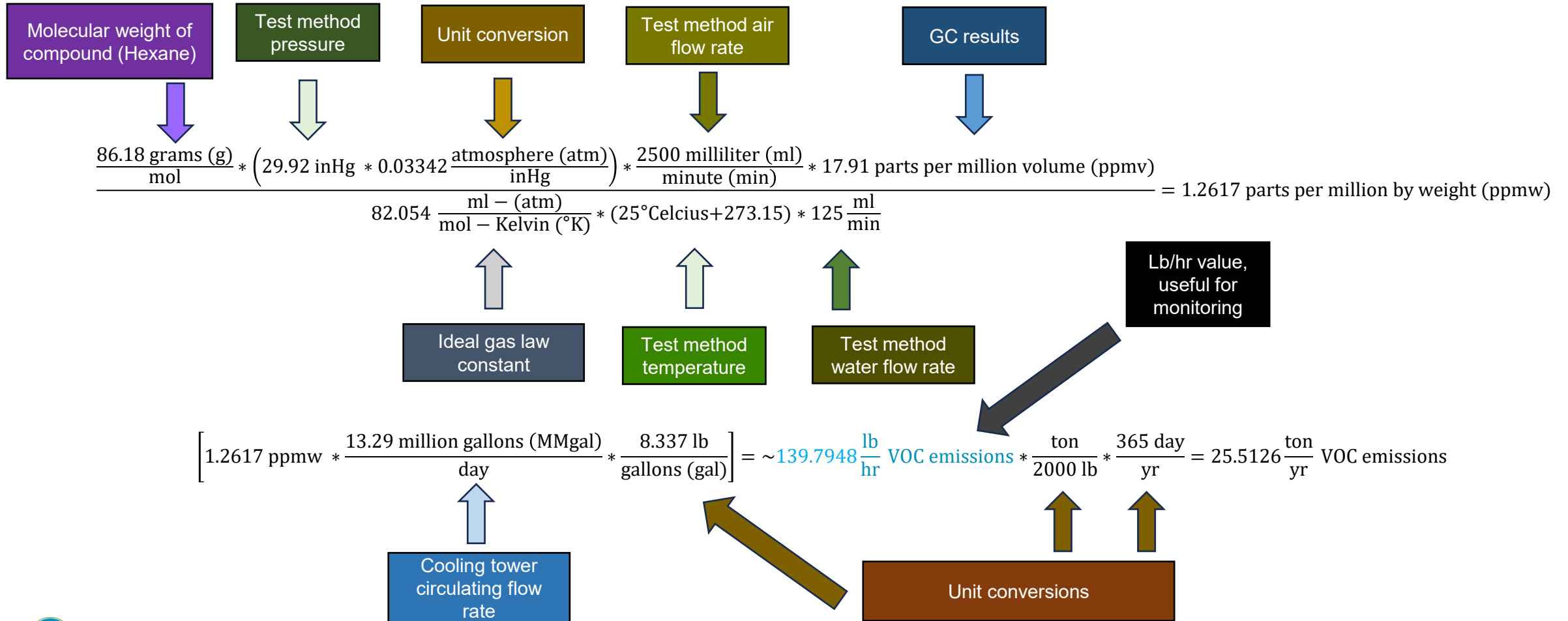
# Cooling Towers

- Include:
  - VOC test results, especially from times when leaks were discovered
  - Cooling water and process fluid pressure readings, where applicable
  - Annual and daily flow rate for cooling water
  - Annual water-treatment chemical usage data for all chlorinated or brominated chemicals
  - Emission rates calculated from measured data
  - Vendor drift rate, or other drift data if applicable



# Cooling Tower Calculation

## Example: VOC emissions for a cooling tower using the El Paso stripping test method



# Part 3

## Guidance for Non-Routine Emissions Reporting

# Reporting EE Data in the EI

- Emissions events (EE) are defined in 30 TAC Subsection 101.1(28) as:
  - an upset event or unscheduled maintenance, startup, or shutdown activity that results in unauthorized emissions.
- Defining an EE:
  - **Reportable EE** is defined as any EE that, in any 24-hour period, resulted in unauthorized emissions equal to or in excess of the reportable quantity (RQ) for any individual air contaminant.
    - These events should have been reported previously to the TCEQ as required by 30 TAC Section 101.201.
  - **Non-reportable EE:** any EE that resulted in unauthorized emissions less than the RQ for any individual air contaminant.

# Reporting EE Data in the EI (cont.)

- Information required to accurately report EE in the EI includes:
  - The total number of reportable and non-reportable EEs
  - Path-level emission totals of individual contaminants in units of tons per year
  - Supporting documentation that shows calculations and specific emission event information

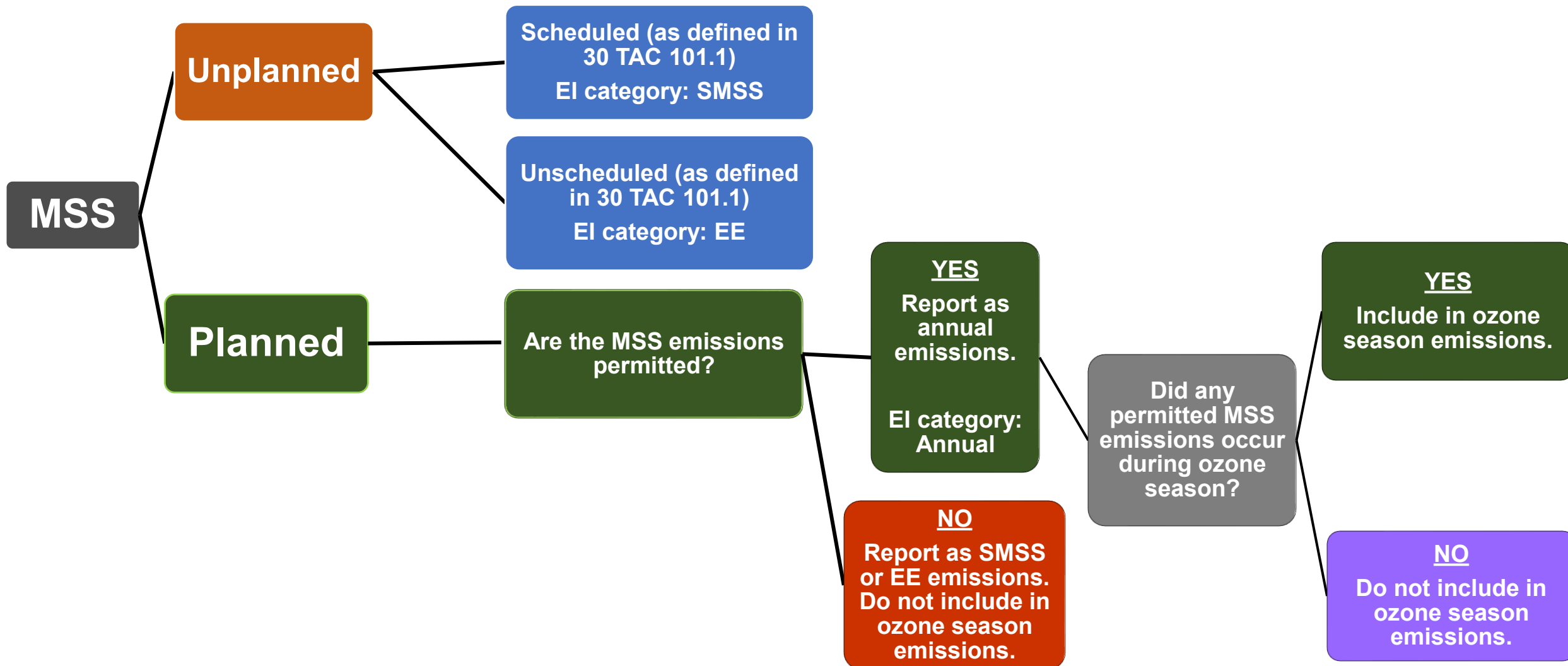
# Reporting SMSS Data in the EI

- Scheduled maintenance, startup, and shutdown (SMSS) activities are defined in 30 TAC Subsection 101.1(91).
- Defining an SMSS activity:
  - The total number of reportable and non-reportable SMSS activities
  - **Reportable SMSS:** any SMSS activity for which prior notice was provided that resulted in unauthorized emissions that equaled or exceeded an RQ.
    - A final report for these events should have been submitted to TCEQ as required by 30 TAC Section 101.211.
  - **Non-reportable SMSS:** any SMSS activity that did not result in emissions exceeding an RQ and was recorded as required by 30 TAC Section 101.211.

# Reporting SMSS Data in the EI (cont.)

- Information required to accurately report SMSS activities in the EI includes:
  - The total number of reportable and non-reportable SMSS activities
  - Path-level emission totals of individual contaminants in units of tons per year
  - Supporting documentation that shows calculations and specific emission event information
  - Exception: Do **NOT** include the number of events from maintenance, startup, or shutdown (MSS) activities that are **authorized** by a permit or permit by rule
    - When authorized, these activities are considered routine operations

# Summary of Activities





# Reporting Emissions Related to Excess Opacity Events in the EI

- Excess opacity events are defined in 30 TAC Section 101.1(32) as:
  - When an opacity reading is equal to or exceeds 15 additional percentage points above an applicable opacity limit, averaged over a six-minute period.
  - Additional excess opacity events information can be found in 30 TAC Sections 101.221-101.224.
- Quantify and report the emissions that occurred during the excess opacity event.
- Report the emissions at the **path level** under the appropriate emissions category.

# Part 4

## Guidance for Public versus Confidential Data

# Public EI Data

- The data contained in the EI are available to the public
- Emissions data **should not** be marked **confidential**

# Public EI Data (cont.)

- Public emissions data include:
  - Emissions rates (actual, ozone season, emissions events, or maintenance, startup, or shutdown activities)
  - Emissions factors
  - Emissions control equipment type and associated control efficiencies
  - Determination methods
  - Release point location
  - Characteristic data about the emissions sources

# Confidential Data

- Examples of potentially **confidential** information:
  - Material throughputs
  - Process flow diagrams
  - Process rates
  - Production rates
  - Trade secrets (information that reveals proprietary process or methods of manufacture or production)

# How to Submit Confidential Supporting Documentation

- Mark every confidential document page clearly and in a different color (e.g. “**CONFIDENTIAL**”)
- Submit confidential information through the TCEQ secure File Transfer Protocol (FTPS) website
  - Visit <https://ftps.tceq.texas.gov/help/> for more information
- Mail confidential information through the United States Postal Service (USPS) to:

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

# How to Submit Confidential Supporting Documentation (cont.)

- Mail confidential information through delivery 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
- Do not send confidential EI information through email or State of Texas Environmental Electronic Reporting System (STEERS) Web-EI document attachment function.



# How to Submit Non-Confidential Supporting Documentation

- Attach documents to the STEERS
- Supporting documents cannot be submitted via STEERS **after** the EI has been submitted
  - Must ensure documents are attached prior to hitting the “submit” button.
- Mail hard copies via USPS or overnight service (see previous slide for addresses)

# How to Submit Inapplicability and Insignificant Emissions Change Letters

- Cannot be submitted through the STEERS AEIR system
- Mail hard copies via USPS or overnight service (see previous slides for addresses) with “wet ink” signature
- All notification letters must be postmarked by the due date
- Applicability and Insignificant Change information found in RG-360, Chapter 1
- Letters found in RG-360, Appendix B

# Part 5

## General Guidance

# Things to Provide

- Review of items already mentioned:
  - Detailed sample calculations for the current year
  - Relevant summary reports from software programs, testing data, vendor data, etc.
  - Equations and input data
  - Explanations for TRI/AEME and EI discrepancies
  - Speciation for non-combustion VOC emissions
  - Summary spreadsheets listing emissions totals per path
  - Explanations for significant changes (increases and/or decreases) in emissions
  - Report NO<sub>x</sub> emission factors and heat input for all sources with 10 tons per year (tpy) or greater NO<sub>x</sub> emissions

# Things to Provide (cont.)

- Legible documents
  - Font size of at least 10 when using paper
  - Readable scanned and emailed PDFs
  - Electronic files of Excel spreadsheets rather than PDFs so that formulas can be easily reviewed
- For software programs:
  - Name of the program
  - Reports that list all input parameters and values
  - Explanation of equations/calculations used
  - Other relevant data to reproduce emissions estimates

# Things to Avoid

- Listing the permit as the source for an emissions factor
  - Provide the origin of the factor used for the permit
- Using average annual data instead of actual ozone season data when calculating ozone season emissions
- Including supporting documentation for other sites
  - Only provide site-specific data

# Things to Avoid (cont.)

- Using internal labels for facility identification numbers (FIN) and/or emission point numbers (EPN) that do not match the FINs and EPNs in the EI
- Example:
  - Caterpillar Engine 3616TALE = FIN: ENG3616 in the EI
  - Internally, Caterpillar 3616TALE is referred to as “Unit 3”
  - Do not refer to “FIN: Unit 3” in the supporting documents, instead, refer to "FIN: ENG3616"

# Common EI Reporting Issues for Determination Methods

- EI emissions are reported as method code “X”, company documentation states method code “Y”
  - Double check documentation to ensure it matches EI submission
  - Include relevant reporting year data
- Highly reactive volatile organic compound (HRVOC) monitoring
  - Report these HRVOC emissions as method code H: 1,3-butadiene, ethylene, propylene, and all isomers of butene
  - Report other contaminants as method code B: all non-HRVOCs determined through HRVOC monitoring calculations



# Common EI Reporting Issues for Determination Methods (cont.)

- Properly coding EPA TANKS 5.1 data
  - Utilizes AP-42, Chapter 7 information
  - Methodology is method code A
- Combustion engines, test data for total organic carbon (TOC)
  - Stack testing and vendor data sometimes provide TOC results instead of VOC
  - VOC emissions must be determined by multiplying hydrocarbon emission factor by the following ratio: 
$$\frac{\text{EPA's AP - 42 VOC Emission Factor}}{\text{EPA's AP - 42 TOC Emission Factor}}$$
  - Methodology is method code S
- Sulfur dioxide (SO<sub>2</sub>) emissions from flares
  - Predominantly calculated from hydrogen sulfide (H<sub>2</sub>S) material balance (Method Code B)
  - Provide references if another calculation methodology is utilized

# Common EI Reporting Issues for Particulate Matter (PM)

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

# El Reporting Issues for Nitric Oxide (NO)

- Nitric oxide (NO) being reported instead of nitrogen oxides (NO<sub>x</sub>)
  - Combustion emits NO<sub>x</sub>, both nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>) in aggregate
  - Rapid conversion of NO → NO<sub>2</sub> (minutes)
  - **Report all NO emissions (including routine, SMSS, and EE emissions) as NO<sub>x</sub> emissions using the molecular weight of NO<sub>2</sub>, in accordance with EPA regulations.**
    - 40 Code of Federal Regulations (CFR) Section 51.50: “*Nitrogen oxides (NO<sub>x</sub>)* means nitrogen oxides (NO<sub>x</sub>) as defined in [40 CFR 60.2](#) as all oxides of nitrogen except N<sub>2</sub>O. Nitrogen oxides should be reported on an equivalent molecular weight basis as nitrogen dioxide (NO<sub>2</sub>).”

# Additional Resources

- Available resources on EAS webpage:  
<http://www.tceq.texas.gov/airquality/point-source-ei/psei.html>
  - 2025 *Emissions Inventory Guidelines* (RG-360)
  - Sample calculation forms
  - Structure change forms
  - Emissions inventory checklist
  - Inapplicability letter
  - Insignificant emissions change
  - FTPS (confidential files) help
  - Frequently asked questions

# Contact Information

- EAS Helpline:
  - (512) 239-1773 Monday-Friday, 8 AM-5 PM
  - [psinvent@tceq.texas.gov](mailto:psinvent@tceq.texas.gov)
- Anthony Correale:
  - (512) 239-6155
  - [anthony.correale@tceq.texas.gov](mailto:anthony.correale@tceq.texas.gov)



**Questions?**





# **TCEQ Section 185 Failure to Attain Penalty Fee for the 2008 Eight-Hour Ozone National Ambient Air Quality Standard (Standard)**

# Overview

- Federal Clean Air Act (FCAA) rule requirements
- Key points of adopted rule
- Important emissions inventory (EI) reporting years for the Section 185 fee
- Section 185 fee calculation example
- Potential implementation timeframe



# FCAA, Section 185 Fee Requirements

- Penalty fee (fee, Section 185 fee, Failure to Attain Fee) imposed if an area **fails to attain** an ozone standard by its severe or extreme attainment date.
  - U.S. Environmental Protection Agency (EPA) required TCEQ to develop a rule for the 10-county Dallas-Fort Worth (DFW) and eight-county Houston-Galveston-Brazoria (HGB) severe nonattainment areas under the 2008 eight-hour ozone standard.
  - The DFW and HGB severe attainment date is July 20, 2027.
- **If implemented**, the fee applies to major stationary sources (major sources) of volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) emissions in severe or extreme ozone nonattainment areas.
  - Typically includes larger **point sources** such as power plants, cement plants, petrochemical facilities, etc.

# FCAA, Section 185 Fee Requirements (cont.)

- The fee is \$5,000 per ton of ozone precursor emissions over a set baseline amount and is adjusted annually for inflation by EPA.
  - **The current 2025 fee rate set by EPA is \$12,850.67 per ton of emissions.**
  - EPA typically updates the fee rate every fall.
- The fee is required each year after the missed attainment date until the area is redesignated as attainment by EPA.
- If the state does not impose the fee, EPA is required to impose with interest, and the revenue is not returned to the state.

# Section 185 Fee Program: Key Points

- On October 22, 2025, the commission adopted the TCEQ Section 185 fee program and submitted it to EPA on November 7, 2025.
- The fee program was **NOT** implemented upon adoption.
- If the [DFW and/or HGB nonattainment areas](#) do not attain the 2008 ozone standard by the EPA-specified due date of July 20, 2027, then the fee would be applicable upon the **effective date** of EPA's failure to attain notice published in the *Federal Register*.

# Section 185 Fee Program: Key Points (cont.)

- The rule incorporates flexibilities and fee offset provisions.
  - Rule is similar to the EPA-approved Section 185 fee program for the one-hour ozone standard.
- Each major source sets an emissions baseline amount based on attainment year ozone precursor emissions.
  - For the DFW and HGB severe nonattainment areas, the current attainment year is 2027.
- For each year after the attainment year (e.g., 2027), the fee is determined by the amount of ozone precursor emissions that exceed the major source's baseline amount.

# Section 185 Fee Program: Baseline Flexibilities

- Under the rule, major sources may aggregate emissions for the baseline amount:
  - by pollutant; and/or
  - across sites under common control.
- Major sources may also adjust their baseline amount under specific circumstances, such as equipment ownership changes.
- After major sources establish their baseline amounts using allowed flexibilities, TCEQ would annually calculate the fee for each major source and then total these fees to determine the entire fee owed for each nonattainment area.

# Section 185 Fee Program: Offset Provisions

- The rule offsets each nonattainment area's total fee obligation by crediting total annual Texas Emissions Reduction Plan (TERP) revenue collected from that nonattainment area.
  - As long as any TERP grant funds are also expended within that nonattainment area during the same year.
- If TERP or another program's revenue could not offset the entire fee obligation for a nonattainment area, then TCEQ would assess a prorated fee on major sources.
- Major sources can use emissions reductions credits and/or certain portions of supplemental environmental projects to offset the fee owed for an individual site or group of sites.

# Section 185 Fee Program: Termination

- The fee program ends upon:
  - redesignation of the nonattainment area to attainment by EPA (effective date specified in the *Federal Register*);
  - any final action or final rulemaking by EPA to end the fee;
  - a finding of attainment by EPA; or
  - a demonstration indicating that the area would have attained by the attainment date but for emissions emanating from outside the U.S.
- The Executive Director can suspend fee collection if either of the following are submitted to EPA:
  - three years of quality-assured air monitoring data resulting in a design value for the nonattainment area that does not exceed the 2008 eight-hour ozone standard (may exclude exceptional event days); or
  - a demonstration indicating that the area would have attained by the attainment date but for emissions emanating from outside the U.S.



# Important Potential EI Reporting Years for Section 185

- The baseline year is determined by the attainment date (July 20, 2027).
- Reporting year (RY) 2027 EI would likely be the baseline year for most major sources, assuming:
  - the baseline emissions (VOC and/or NO<sub>x</sub> reported in the 2027 EI) are lower than the permitted emissions, and
  - the major source operated on or before 1/1/27.
- RY 2028 EI would be the first fee assessment year for major sources that operated for the entire 2027 baseline year.

# Section 185 Fee Calculation Example

- For purposes of this example assume:
  - Stationary source major for NO<sub>x</sub> emissions only
  - EI emissions lower than the permitted emissions in 2027
  - 2027 baseline year reported 100 tons per year (tpy) of NO<sub>x</sub> in the EI
  - 2028 first fee assessment year
  - CY 2025 Section 185 fee rate to estimate amount to be paid
- Baseline amount calculation:
$$100 \text{ tpy} * 80\% = 80 \text{ tpy}$$
- Fee would be paid on RY 2028 NO<sub>x</sub> emissions emitted over 80 tpy reported in the EI.

# Section 185 Fee Calculation Example (cont.)

- For RY 2028, 125 tons of NO<sub>x</sub> was reported in the EI.

$$(125 - 80) = 45$$

- Site would pay the fee on 45 tons of NO<sub>x</sub> emissions in 2028.
- Using the CY 2025 fee rate for example purposes, the site would pay **\$578,280.15** for NO<sub>x</sub> emissions in 2028.  
$$\$12,850.67 * 45 = \$578,280.15$$
- Fee collection would likely not occur until CY 2030.

# DFW and HGB Potential Fee Assessment Timing

| Date                                    | Event   |
|---|---|
| 7/20/27                                 | 2008 eight-hour ozone standard severe attainment date based on 2024, 2025, and 2026 monitoring data.  |
| ~11/2027 (assumed for example purposes) | If EPA published the finding of failure to attain notice in the Federal Register within three months of the missed attainment date, then the effective date <b>could be</b> in November 2027. |
| 3/31/28                                 | 2027 EIs and baseline amounts are due to TCEQ.  |
| 3/31/28-12/15/28                        | TCEQ staff quality assure the 2027 EIs and baseline amounts.  |
| ~Fall 2028                              | EPA publishes the 2028 fee rate (typically occurs in Oct or Nov).   |
| 12/31/28                                | 2027 EIs are due to EPA.  |
| 4/2/29                                  | 2028 EIs are due to TCEQ (3/31/29 falls on a Saturday).   |
| 4/2/29-Summer 2029                      | TCEQ staff prioritize quality assurance of fee-related 2028 EIs.  |
| ~Fall 2029                              | TCEQ staff assesses the fee for the 2028 first fee assessment year.   |
| ~Early 2030                             | TCEQ staff invoices the 2028 first fee assessment year based on final 2027 baseline amounts and final 2028 first fee assessment year EI emissions. 2030 is the first fee collection year.     |

# Contact Information and Resources

- Jill Dickey-Hull, Project Manager
  - [jill.dickey@tceq.texas.gov](mailto:jill.dickey@tceq.texas.gov)
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- Email: [185Rule@tceq.texas.gov](mailto:185Rule@tceq.texas.gov)
- Section 185 Stakeholder [webpage](#)



**Questions?**