

# **Chapter 1. Emissions Inventory General Information**

## **Introduction to Emissions Inventory**

As part of national and state efforts to protect human health and the environment, federal and state laws require the state of Texas to develop an annual emissions inventory (EI) of the air pollutants.

The Texas Commission on Environmental Quality (TCEQ) is authorized to request emissions inventories and supporting documentation under the provisions of:

- Federal Clean Air Act.
- Texas Clean Air Act, Texas Health and Safety Code Section 382.014.
- Title 30 of the Texas Administrative Code (30 TAC), Section 101.10—the Emissions Inventory Requirements.

To meet the reporting requirements of these regulations, the regulated community will be working with the Emissions Assessment Section (EAS) of TCEQ's Office of Air.

TCEQ uses the EI to plan pollution control programs, promote compliance with laws and regulations, conduct permit reviews, develop airshed modeling and rulemaking activities, and supply required data to the U.S. Environmental Protection Agency (EPA).

## **What This Publication Contains**

This chapter discusses 30 TAC Section 101.10 and what constitutes a complete EI submission. This information should help owners or operators of regulated entities determine whether an EI is required for a site and correctly prepare a complete EI submission by the due date. A brief discussion of the EAS's confidentiality policy is included in this chapter. The chapter concludes with a brief discussion of the two options available for submitting an EI through the Annual Emissions Inventory Report (AEIR) program area within the State of Texas Electronic Emissions Reporting System (STEERS) Web-EI System.

Chapter 2 explains the EI process and its key concepts to those unfamiliar with the EI.

Chapter 3 discusses correct EI structure (representing processes in the EI), gives examples for some common industrial processes, and supplies guidance for modifying existing representations.

Chapter 4 presents information about requested emissions data; using acceptable actual emissions determination methodologies; speciating emissions; and correctly reporting actual annual emissions, ozone season emissions, and emissions due to emissions events and scheduled maintenance, startup, and shutdown activities.

Chapter 5 offers an example of creating an initial EI.

Chapter 6 contains instructions for updating an EI.

Chapter 7 includes instructions on revising EI data, requesting EI data, and verifying site coordinate data.

The appendices contain:

- Technical supplements intended to help determine emissions from certain sources.
- Sample letters that may help address some common situations.
- EPA and TCEQ resources to assist in completing or updating an EI.

Also included in this publication are (1) a glossary, (2) a list of abbreviations, and (3) information on contacting the EAS. A checklist is available upon request to help determine if all necessary supporting documentation is included with the EI.

*Note:* Detailed EI reporting instructions and frequently asked questions are available for download at the EAS webpage [Point Source Emissions Inventory](#).<sup>a</sup> Any EI tools referred to in this publication can be found on that webpage.

## About 30 Texas Administrative Code Section 101.10

This section includes a discussion of the EI process as a self-reporting process, the special inventory request, location of 30 TAC Section 101.10, and a table depicting the state's special inventory areas.

A map and summary table titled “Emissions Inventory Reporting Requirements” that identifies EI reporting thresholds, ozone nonattainment and ozone-precursor special inventory reporting requirements can be found on the [EAS webpage](#). The map and associated table are intended to clarify reporting requirements and do not supersede or replace requirements of federal or state law, including 30 TAC Section 101.10. It is the responsibility of the owner or operator of a regulated entity to read and understand all federal and state laws and regulations applicable to the regulated entity, including 30 TAC Section 101.10, the Emissions Inventory Requirements. The requirements of 30 TAC Section 101.10 can be found at the [Texas Administrative Code online](#).<sup>b</sup>

## A Self-Reporting Process

TCEQ requires sites that meet the reporting requirements of 30 TAC Section 101.10 to submit emissions inventories through the STEERS-AEIR Web-EI System. Please contact the EAS immediately if you have questions regarding the online reporting requirement.

The EI process requires self-reporting. The owner or operator of the regulated entity is responsible for determining if and when 30 TAC Section 101.10 applies to the site. If it applies, or if TCEQ requests a special inventory, the owner or operator must submit an

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<sup>a</sup> [www.tceq.texas.gov/goto/ieas](http://www.tceq.texas.gov/goto/ieas)

<sup>b</sup> [www.tceq.texas.gov/goto/view-30tac](http://www.tceq.texas.gov/goto/view-30tac)

EI by March 31 of the calendar year immediately after the reporting year or as directed in writing by the agency. Failure to do so may result in the agency initiating an enforcement action against the owner or operator. Responsibility for submitting the EI resides with the owner or operator of the site at the time the inventory is due.

**Compliance with 30 TAC Section 101.10 is required even if you do not receive a courtesy reminder notification from TCEQ.**

Requirements for submitting an EI may vary based on the site location and on the type and quantity of emissions released. This publication will help in determining whether the owner or operator must submit an EI and, if so, how to determine emissions, and how to prepare and submit the required information.

TCEQ requires emissions inventories to be submitted online through its STEERS-AEIR Web-EI system, either by interactive web entry or text-file upload. For more information on how to submit online, please see the [EAS webpage](#).

## Nonattainment Designations

For the official list and boundaries of nonattainment areas, see Title 40, Code of Federal Regulations (CFR), Section 81.344, and pertinent *Federal Register* notices.

Please note that EPA has not updated the CFR to reflect the D.C. Circuit Court of Appeals' June 30, 2023, decision regarding EPA's nonattainment designation for the 2015 ozone NAAQS for the El Paso-Las Cruces, Texas-New Mexico area. As a result of the Court's decision, El Paso County has reverted to its prior attainment designation for the 2015 ozone NAAQS. TCEQ is conducting a special emissions inventory request for El Paso County for the 2025 reporting year under the provisions explained below. The map titled "Emissions Inventory Reporting Requirements" identifies the EI reporting thresholds, ozone nonattainment areas, and ozone-precursor special inventory counties.

*Note:* For areas designated as nonattainment under more than one ozone National Ambient Air Quality Standard (NAAQS), the most stringent classification is used to determine reporting requirements for ozone-precursor potential emissions.

A link to this map can be found on the [EAS webpage](#). The map and its associated table are intended as guidance and do not supersede or replace any state or federal law or regulation.

## Special Inventory Request

TCEQ, under the "special emissions inventory" provisions of 30 TAC Subsection 101.10(b)(3), has the authority to request emissions inventories to be completed and submitted. If a regulated entity meets the thresholds explained below and TCEQ has notified the regulated entity with a formal written request, the owner or operator must complete and submit an EI by the required date.

*Note:* Regulated entities that meet any of the other applicability requirements of 30 TAC Section 101.10 are required to submit an EI regardless of whether TCEQ has made a formal written request.

### ***Requirements for Sources That Emit Ozone Precursors in Specified Counties***

TCEQ is conducting a special EI for sources that emit ozone precursors in specified counties under the authority of 30 TAC Subsection 101.10(b)(3). Regulated entities that are located in a specified county and emit a minimum of either 10 tons per year (tpy) of volatile organic compounds (VOC) or 25 tpy of nitrogen oxides (NO<sub>x</sub>) during normal operations must submit a complete EI by the required due date, if TCEQ has notified the regulated entity with a formal written request.

#### **Ozone-Precursor Special Inventory Counties**

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

## Emissions Inventory Reporting Requirements Map

The map is located on the [EAS webpage](#). The map and associated table are intended to clarify reporting requirements and do not supersede or replace requirements of federal or state law, including 30 TAC Section 101.10.

## Due Date

The EI is due on March 31 of the calendar year immediately after the reporting year unless otherwise specified in writing by TCEQ.

Emissions inventories that are submitted through the STEERS-AEIR Web-EI system will not be considered late as long as the file is validated by the due date. After submitting the EI, the user will receive two emails. The first email confirms that the data have been placed in the queue for validation processing. The second email will state whether the submission passed or failed validation. If validation succeeded, TCEQ will consider the EI “received” in accordance with 30 TAC Section 101.10. If validation failed, the user must correct the errors and submit the data again. The EI will not be assigned a received date until the EI passes validation.

Sample calculations and supporting documentation are part of a complete EI submission and must be submitted by the EI due date. Nonconfidential information should be attached to the STEERS-AEIR Web-EI system or emailed to [psdocument@tceq.texas.gov](mailto:psdocument@tceq.texas.gov). Confidential information can be submitted through the TCEQ secure File Transfer Protocol (FTPS) website. Check for an existing FTPS account, register for a new FTPS account, log into an existing FTPS account, and find FTPS help documents at the [FTPS webpage](#).<sup>a</sup> Please contact the EAS for assistance on submitting confidential information through the secure FTPS website.

Inapplicability and Insignificant Emissions Change Notification letters can only be submitted on paper (consult the section titled “Hard Copy Signature Requirements”) and must be postmarked by the EI due date. A courtesy copy may be emailed to [psdocument@tceq.texas.gov](mailto:psdocument@tceq.texas.gov).

The owner or operator on the date that the inventory is due is responsible for submitting the EI. To document compliance, TCEQ recommends that the owner or operator confirms receipt by the agency and keeps a record of the confirmation on file; for example, archiving the email from the STEERS-AEIR Web-EI system stating that the EI submission passed validation.

Compliance with 30 TAC Section 101.10 is required even if you do not receive a courtesy reminder notification from TCEQ.

*Note:* New owners or operators should ensure that they obtain all appropriate records necessary to accurately represent emissions for the full EI reporting period.

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<sup>a</sup> <https://tceq.texas.gov/>

*Note:* If the due date falls on a weekend or legal holiday, the EI must be validated (for STEERS-AEIR Web-EI system submissions) or postmarked (for notification letters) by the following business day, per 30 TAC Section 1.7.

## What Constitutes a Complete Submission?

A complete EI submission includes a complete and updated EI; a signed certification statement; sample calculations representative of the current processes at the site; summary test results, if stack-test data are used to determine emissions; either summary Relative Accuracy Test Audit (RATA) sheets, or, if a RATA is not required by applicable permit conditions or regulations, documentation from a similar system audit (e.g., cylinder gas audit) for continuous emissions monitoring systems (CEMS) or predictive emissions-monitoring systems (PEMS) data that are used to determine emissions; and material throughput information.

TCEQ requires annual EI updates, initial emissions inventories, and special emissions inventories to be submitted online through the STEERS-AEIR Web-EI system, using either the interactive web entry or text-file upload. Submission through the STEERS-AEIR Web-EI system serves as the certification and constitutes a legally binding electronic signature by the legally responsible party. The STEERS-AEIR Web-EI submission process also includes an option for an electronic Emissions Events Certification signature (if applicable).

*Note:* Submission through the STEERS-AEIR Web-EI system must be certified and submitted by a legally responsible company official. For Title V sites, submit authority should only be given to the responsible official or their duly authorized representative. Under no circumstances should a consultant be given submit authority or certify an EI.

For additional requirements regarding EI submissions through STEERS-AEIR Web-EI system, refer to the sections later in this chapter and the information at the [EAS webpage](#).

This section discusses various reporting situations in detail below. No matter what the reporting situation, compliance with 30 TAC Section 101.10 is required even if you do not receive a courtesy reminder notification from TCEQ.

## Requirements for Submitting a New or Updated EI

If a site has not previously submitted an EI and it meets the EI reporting requirements of 30 TAC Section 101.10 for a given calendar year (reporting year), then the owner or operator is required to submit an initial emissions inventory (IEI).

Any regulated entity that continues to meet the EI reporting requirements of 30 TAC Section 101.10 is required to submit an annual emissions inventory update (AEIU).

When submitting the IEI or AEIU through the STEERS-AEIR Web-EI system, the following information must also be submitted:

- A Core Data Form (TCEQ-10400). For an IEI, this form is necessary when the information is not yet in the Central Registry. For an AEIU, the form is necessary

when sites are updating ownership, name, or location. If this form has already been submitted to the Central Registry, please include a copy with the EI.

- Supporting documentation and sample calculations representative of the current processes at the site.

The Core Data Form, supporting documentation, and sample calculations may be submitted using the document-attachment function in the STEERS-AEIR Web-EI system. Supporting documentation and sample calculations that are considered confidential should not be submitted through STEERS. Consult the section entitled “Confidential Data and Other Information” below for instructions on submitting supporting documentation that is considered confidential.

When sending electronic files, ensure that the data are self-contained and not linked to external data sources unavailable to TCEQ. For electronic files, the preferred formats are Microsoft Word, Excel, Access, and Adobe PDF.

*Note:* All EIs must be submitted through the STEERS-AEIR Web-EI system. For more information on how to submit online, please see the [EAS webpage](#) or contact the EAS.

## **Special Requirements for a Site That Experienced Insignificant Changes in Emissions**

Submission of an updated EI is not required if the total actual annual emissions of VOCs, NO<sub>x</sub>, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), lead (Pb), particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>), and particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM<sub>2.5</sub>) are each within 5% or five tons, whichever is greater, of the most recent total actual annual emissions reported in the State of Texas Air Reporting System (STARS) database. Instead, the owner or operator may request that the EAS roll over the most recent annual emissions to the current reporting year.

If the site experienced no emissions due to emissions events (EE) or scheduled maintenance, startup, or shutdown (SMSS) activities, then the owner or operator may formally request to have the EAS roll over the most recent annual and ozone season emissions to the current reporting year by submitting the following by the EI due date:

- Insignificant Emissions Change Notification letter in Appendix B or a similarly worded letter.
- Account Information and Emissions Inventory Contact Information, page 2 of the EIQ.
- Criteria Emissions Totals and Site Quantifiable Event Totals, page 3 of the EIQ with the current year's totals entered.
- Signed Emissions Events and Legally Responsible Party certification statements, page 4 of the EIQ.

If the site experienced emissions due to EE or SMSS activities, the owner or operator may still submit a formal request to have the EAS roll over the most recent annual and

ozone season emission rates to the current year. However, the emissions from EE or SMSS activities are required to be updated by submitting the following by the EI due date:

- Insignificant Emissions Change Notification letter in Appendix B or similarly worded letter.
- Account Information and Emissions Inventory Contact Information, page 2 of the EIQ.
- Criteria Emissions Totals and Site Quantifiable Event Totals, page 3 of the EIQ.
- For regulated entities reporting only SMSS emissions and not reporting emissions events, the signed Emissions Events certification statement, page 4 of the EIQ.
- Signed Legally Responsible Party certification statement, page 4 of the EIQ.
- All applicable pages relating to path emissions of the original EIQ updated to reflect emissions from EE or SMSS activities.

For a complete STEERS EI submission, an Insignificant Emissions Change Notification letter is required to be submitted when the site's actual annual emissions are being rolled over from the most recent emissions to the current reporting year. A hard copy of the insignificant change letter should be mailed or hand delivered to the EAS (consult the section entitled "Hard Copy Signature Requirements").

When submitting an Insignificant Emissions Change Notification letter, sample calculations and other supporting documentation may need to be supplied upon request.

*Note:* The Insignificant Change Notification letter and the certification statements must be signed by a legally responsible official of the company. These documents cannot be signed by a consultant.

### **If a Site Does Not Meet the Requirements of 30 TAC Section 101.10 for the Current Emissions Inventory Year (But Wants to Remain on the Mailing List)**

If the owner or operator has determined that a site does not meet the EI reporting requirements of 30 TAC Section 101.10 for the current inventory year, but may meet applicability requirements in future years, then the site may submit an Inapplicability Notification letter (Appendix B) or similarly worded letter by the EI due date. In this reporting scenario, choose "Option 1" on the Inapplicability Notification letter in Appendix B to keep the site on the mailing list. The hard copy letter must be mailed or hand delivered to the EAS (consult section entitled "Hard Copy Signature Requirements"); currently there is no option to submit an inapplicability notification through the STEERS-AEIR Web-EI system.

*Note:* By submitting this letter or a similarly worded letter, the owner or operator of the regulated entity will remain on future EAS mailing lists and continue to receive a courtesy notification letter. The owner or operator must submit a letter to the agency for each reporting year that the site does not meet the reporting requirements. The



letter must be signed by a legally responsible official of the company and may not be signed by a consultant.

For this reporting situation, sample calculations and other supporting documentation may need to be supplied upon request.

An Inapplicability Notification letter may not be submitted in lieu of an EI if the site meets any of the EI reporting requirements of 30 TAC Section 101.10 at any time during the calendar year. If those EI reporting requirements occur, owner or operator shall submit an annual emissions inventory for that calendar year.

If the site is a major source as defined in 30 TAC Section 116.12 or 30 TAC Section 122.10 at any time during the calendar year or has an active Title V permit due to either actual annual emissions or potential-to-emit (PTE) levels, the owner or operator must submit an EI by the applicable due date.

Sitewide permitted emissions-limits and actual emissions should be reviewed to determine if they exceed the EI reporting thresholds. For example, a site that is not a major source but is permitted by rule may still exceed the EI reporting thresholds.

### **If a Site Does Not Expect to Meet the Applicability Requirements of 30 TAC Section 101.10 in Future Years (And Wants to Be Removed From the Mailing List)**

If the owner or operator has determined that a site does not meet the applicability requirements of 30 TAC Section 101.10 for the current reporting year *and* does not expect to do so in future reporting years, then the owner or operator may formally request the site's removal from the EAS mailing list by submitting an Inapplicability Notification letter (Appendix B) or a similarly worded letter by the EI due date. In this reporting scenario, choose "Option 2" on the Inapplicability Notification letter in Appendix B to remove the site from the mailing list. The hard copy letter must be mailed or hand delivered to the EAS (consult the section titled "Hard Copy Signature Requirements"); currently there is no option to submit an Inapplicability Notification through STEERS-AEIR Web-EI system.

The letter must be signed by a legally responsible official of the company and may not be signed by a consultant. The EAS only accepts written requests for removal from the mailing list.

If the latest emissions reported in the STARS database exceed the rule applicability requirements, TCEQ cannot remove the regulated entity from the annual EI mailing list unless the owner or operator submits a current updated EI and sample calculations. After the EI data are updated in STARS, the site can then be removed from the mailing list.

If the site is a major source as defined in 30 TAC Section 116.12 or 30 TAC Section 122.10 at any time during the calendar year, the site cannot be removed from the mailing list for that year. The owner or operator must submit an EI by the applicable due date.

*Note:* If a site has an active Title V permit due to either actual annual emissions or PTE levels, the site will remain on the mailing list.

Sitewide permitted emissions limits and actual emissions should be reviewed to determine if they exceed the EI reporting thresholds. For example, a site that is not a major source but is permitted by rule may still exceed the EI reporting thresholds. If the site meets any of the EI reporting requirements of 30 TAC Section 101.10 at any time during the calendar year, the owner or operator must submit an annual emissions inventory for that calendar year.

For example, if the owner or operator of a site lowers the site's PTE levels below major-source thresholds by accepting federally enforceable limitations in a NSR permit issued in June of a calendar year, and actual annual emissions for that calendar year do not meet the reporting thresholds of 30 TAC Section 101.10, the owner or operator must submit an inventory for the entire calendar year since site PTE levels were at or above major-source levels for part of the year. For the subsequent calendar year, if the site did not meet reporting requirements of 30 TAC Section 101.10, the owner or operator can request to be removed from the mailing list.

**If a regulated entity that has been removed from the mailing list meets the EI reporting requirements of 30 TAC Section 101.10 at any time in the future, it is the responsibility of the owner or operator to submit an EI by the due date.**

## **Hard Copy Signature Requirements**

The Inapplicability and Insignificant Emissions Change Notification letters must contain a wet-ink signature of the appropriate responsible official (if Title V) or company representative to comply with the EPA's Cross-Media Electronic Reporting Rule.

## **If a Site Is Permitted but Not Built**

If a site is permitted but not built, the requirement to submit an EI may not apply. However, an owner or operator may submit an IEI to establish structure. All emissions should be entered as zero. However, due to database requirements, seasonal percentages must total 100. For more information on reporting structure for sites that are "planned" or "under construction," contact the EAS.

## **Sample Calculations**

Per 30 TAC Subsection 101.10(c), sample calculations representative of the processes at the site must be submitted with the inventory and updated each year. Submit sample calculations showing determinations of emissions for each different type of process present in the EI, including enough data so that the determination results may be reasonably reproduced. TCEQ cannot accept generic sample calculations, since they do not contain representative process data and do not demonstrate actual emissions determinations. For similar reasons, summary spreadsheets listing emissions quantities are not considered sample calculations. Sample calculation templates giving minimum requirements for common source types are available on the EAS webpage.

Refer to the following guidelines when sending representative sample calculations:

- When several sources of the same type are present and a **single** calculation methodology was used to determine emissions:
  - Include calculations for the source with the highest emissions.
  - Include the current reporting year's process data for each source for which sample calculations are not supplied.
- When several sources of the same type are present but **different** calculation methodologies were used to determine emissions:
  - Include calculations for the source with the highest emissions for each calculation methodology.
  - Include typical process data for each source that uses a different calculation methodology and for which sample calculations are not supplied.

Examples of the current reporting year's process data include heat inputs and fuel types for combustion sources and chemical types and throughputs for storage tanks and loading sources.

*Note:* All printed supporting documentation should be submitted in 10 point or larger type unless specifically approved by EAS.

## Confidential Data and Other Information

TCEQ holds data confidential as requested in accordance with agency policy and rules (see 30 TAC Section 1.5) unless the Texas Attorney General's Office rules or a court issues an opinion that the data are not protected by state law. If there are any special concerns about confidentiality, contact the EAS. Confidentiality claims do not justify withholding relevant information from TCEQ.

The following information will be kept confidential (when clearly marked as confidential) in accordance with agency policy and rules (see 30 TAC Section 1.5) unless the Texas Attorney General's Office rules or a court issues an opinion that the data are not protected by state law:

- material data (submitted in supporting documentation)
- process flow diagrams
- process rates
- trade secrets (information that reveals secret processes or methods of manufacture or production)

**Information *not* considered confidential includes:**

- the EI report and data contained therein
- emission rates
- heat-input data
- emission point data

- type of emissions control equipment
- type of emitting equipment

Please do not submit confidential information through the STEERS-AEIR Web-EI system or by email to the EAS. Confidentiality cannot be ensured across multiple email servers. The STEERS-AEIR Web-EI system does not have a process to designate information as confidential. Confidential information can be submitted through the TCEQ FTPS website. Check for an existing FTPS account, register for a new FTPS account, log into an existing FTPS account, and find FTPS help documents at the [FTPS webpage](#). After logging into the FTPS account, upload the confidential files, and share with [psdocument@tceq.texas.gov](mailto:psdocument@tceq.texas.gov). Please contact the EAS for assistance on submitting confidential information through the secure FTPS website.

## Web Reporting

Two options are available for updating EI data: an interactive web entry system or text-file upload.

### Reporting an Initial EI or Submitting an Annual EI Update Through Interactive Web Entry

IEIs and AEIUs can be submitted through interactive web entry in STEERS, but please contact the EAS before submitting an IEI through STEERS. Interactive web entry allows updating of the EI data on the company, site, contacts, facility, control devices, emission points, and path emissions through graphical-user-interface windows. The user may save the data in the work area in one or more work sessions until the web entry for the entire updated EI is complete. Users who have historically submitted EI updates on paper may prefer this process. Built-in data checks help prevent errors such as missing required information, data in the wrong format, or limited data that fall outside preset constraints.

After all required EI data is entered, the EI is submitted through STEERS. The system will run validation routines—typically overnight—and inform the user of the status (usually the following business day) by email. If no errors were encountered, the email will state, “AEIR validation process successful,” and the electronic submission will be considered complete. If errors were encountered, the email will state, “AEIR validation process failed,” and an error log will be attached with instructions for viewing the log through STEERS. The STEERS user must correct the errors and attempt validation again. The system will also supply the user with a copy of record of the transacted data.

*Note:* All STEERS-AEIR status emails are sent to users with “edit and submit” authority.

A date of receipt will be assigned to the file on the day the validation is successful. TCEQ must receive a validated file by the EI due date. Otherwise, it will consider the AEIU submission delinquent. The sample calculations and supporting documentation must also be submitted by the EI due date.

The STEERS-AEIR Web-EI system features a document-attachment function that allows inclusion of nonconfidential sample calculations and supporting documentation with the Web-EI submission. The document-attachment function is the primary method for submitting sample calculations and supporting documentation. For electronic files submitted through STEERS, the preferred formats are Microsoft Word, Excel, Access, and PDF.

Additional information on reporting through the STEERS-AEIR, Web-EI system appears at the [EAS webpage](#).

## **Reporting an Initial EI or Submitting a Text File of the Annual EI Update Online Through STEERS**

The IEI and AEIU can be updated and submitted through a text-file upload in STEERS. Please contact the EAS before submitting an IEI through STEERS. The text file must be in an approved electronic format, as outlined in the Electronic Emissions Inventory File Specification, available upon request.

Two steps are required to submit the AEIU text file:

- First, the text file must be loaded into the STEERS work area from the user's personal computer. After the AEIU text file is submitted to the STEERS work area, TCEQ will respond via email, detailing whether the system accepted the AEIU text file.
- Second, the user will submit the file from the STEERS work area to the EAS. The system will run validation routines, typically overnight, and inform the user of the status, usually the following business day, by email.

If no errors were encountered, the email will state "AEIR validation process successful" and the AEIU text-file submission is considered complete. If errors were encountered, the email will state "AEIR validation process failed." The system will also supply the user with a copy of record of the transacted data.

*Note:* All STEERS-AEIR status emails are sent to users with "edit and submit" authority.

If the AEIU text file does not pass the validation routine by the EI due date, TCEQ will consider the AEIU submission delinquent. The sample calculations and supporting documentation must also be submitted by the EI due date for the submission to be considered complete.

Additional information on reporting through the STEERS-AEIR Web-EI system appears on the [EAS webpage](#).