



# ***Emissions Inventory and Annual Air Fees***

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# Two Annual Air Fees

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- The agency assesses two types of annual air fees:
  - air inspection fee
  - air emissions fee
- Fees are assessed each fiscal year
  - If a site meets the applicability requirements and will operate any time during the fiscal year for which the fee is assessed, the full fee is due.
  - A site may be subject to both fees but only the higher of the two will be assessed per rule.



# Air Inspection Fee Applicability

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A regulated entity being operated under one or more of the applicable standard industrial classification (SIC) codes listed in 30 Texas Administrative Code (TAC) Section 101.24 (f).

- 78 specific SIC codes listed
- If the site operates under more than one SIC code, the SIC code that is assessed the higher fee shall be reported.
- For fiscal year (FY) 2018:
  - 2,164 regulated entities statewide assessed a fee
  - \$12.3 million invoiced statewide
  - \$337,258 invoiced for Bexar County for 80 sites



# Air Emissions Fee Applicability

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The owner or operator of an account that is required to obtain a federal operating permit as described in 30 TAC Chapter 122 (relating to Federal Operating Permits Program)

- The fee is based on the allowable emissions rates or actual emissions of all regulated pollutants from all individual emissions points or process units at the site.
- For FY 2018:
  - 899 regulated entities statewide assessed a fee
  - \$36.2 million invoiced statewide
  - \$1 million invoiced for Bexar County for 13 sites



# Types of Emissions Inventories

Developed from **industry**-reported emissions

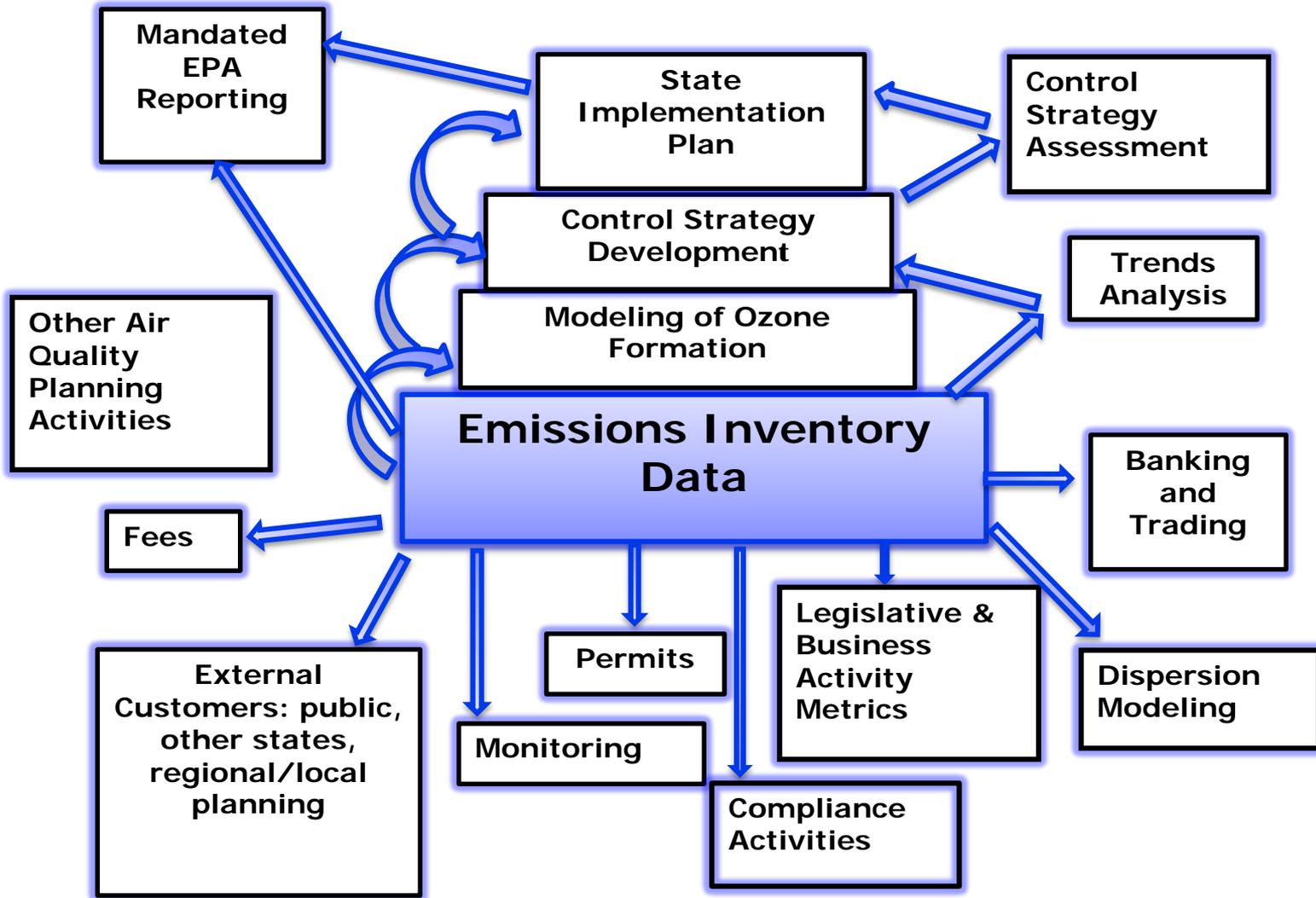
- Point source: refineries, power plants, cement plants, etc...

Texas Commission on Environmental Quality (TCEQ) developed emissions inventories

- Area source: gas stations and residential combustion, etc...
- On-road mobile: cars and trucks, etc...
- Non-road mobile: planes and trains, etc...
- Biogenic: vegetation and soil, etc...



# How are Emissions Inventories Used?





# 30 TAC Section 101.10

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## Emissions Inventory (EI) rule organization

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



# Applicability Requirements: Who Needs to Submit an EI?

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- Need to know:
  - **Potential To Emit (PTE)** and **actual** emissions thresholds for regulated pollutants
  - **PTE** and **actual** emissions thresholds for hazardous air pollutants (HAP)
  - Site location and attainment status of county
- Major stationary source defined under 30 TAC Section 116.12, Nonattainment and Prevention of Significant Deterioration Definitions
  - The rule defines **PTE** thresholds.
  - The major source classification changes based on the attainment status of county



# Applicability Requirements: Who Needs to Submit an EI? (cont.)

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## Statewide

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



# Applicability Requirements: Who Needs to Submit an EI? (cont.) Ozone Nonattainment Areas

- Any account located in an **ozone nonattainment** area **emitting**
  - 10 tpy or more of volatile organic compounds (VOC),
  - 25 tpy or more of nitrogen oxides (NO<sub>x</sub>), or
  - 100 tpy or more of any other contaminant subject to National Ambient Air Quality Standards
- Bexar County is classified as marginal under the 2015 ozone standard.



# Applicability Requirements: Who Needs to Submit an EI? (cont.)

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## Special Inventory

- Regulated entities that receive a written request from the TCEQ
- Respond to the letter even if the site does not meet reporting thresholds
- Current special EI for ozone precursors
  - Site that **emits** at least 10 tpy of VOC or 25 tpy of NO<sub>x</sub> emissions during normal operation *and* that is located in one of the specified counties



# Applicability Requirements: Who Needs to Submit an EI? (cont.) Special Inventory

**2017** Reporting Year (RY) special EI counties for ozone precursors (NO<sub>x</sub> and VOC):

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



# Summary of **2018** RY Thresholds

## Summary of Reporting Requirements (tpy) for 30 TAC Section 101.10

Note: For ozone nonattainment areas, the more stringent or severe classification (where applicable) is used to determine reporting requirements for ozone precursor potential emissions.

County	VOC		NO <sub>x</sub>		Other		Individual HAP		Aggregated HAP	
	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential
Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller <b>MODERATE / OZONE</b>	10	100	25	100	100	100	10	10	25	25
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise <b>MODERATE / OZONE</b>	10	100	25	100	100	100	10	10	25	25
<b>Bexar</b> <b>MARGINAL / OZONE</b>	10	100	25	100	100	100	10	10	25	25
<b>SPECIAL INVENTORY REPORTING THRESHOLDS FOR OZONE PRECURSORS</b>	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>	Lead (Pb) Actual					Lead (Pb) Potential				
REPORTING THRESHOLDS FOR LEAD (All counties)	0.5					10				



# Bexar County 2015 Ozone Nonattainment Designation: EI

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## No Change

- Still pay higher of the two air emissions fees (major source or inspection)
- Title V sites still applicable to EI reporting
- Sites meet any of the statewide reporting requirements still applicable to EI reporting
- Potential emissions reporting thresholds remain the same



# Bexar County 2015 Ozone Nonattainment Designation: EI (cont.)

## What's New

- For RY 2017 and prior, (under the special inventory requirements) the TCEQ had to notify a site in Bexar County to submit an EI that met the 10 tpy VOC or 25 tpy NO<sub>x</sub> **actual** reporting thresholds.
- Starting with RY 2018, (under the 2015 ozone designation), it's the site's responsibility to submit an EI by March 31, if it meets the 10 tpy VOC or 25 tpy NO<sub>x</sub> **actual** reporting thresholds.



# Who's Responsible for Submitting the EI?

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- The owner or operator of the site at the time the inventory is due (March 31) is responsible for submitting the EI.
- Required to be submitted through the State of Texas Environmental Electronic Reporting System (STEERS) Annual Emissions Inventory Reporting (AEIR) Web-based system
  - Also referred to as “Web-EI”
  - Person designated as Submit Authority in STEERS submits and certifies the EI data



# What is Web-EI?

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- STEERS is the web portal for reporting numerous types of environmental data electronically to the TCEQ
  - Different program areas have specific application or reporting functions within STEERS.
- AEIR (“Web-EI”) is a two-pronged system that allows for:
  - Direct entry of EI data (manual/EIQ entry option)
  - Upload of data in a single text file (file upload option)
- Document attachment function allows for submission of non-confidential supporting documentation.



# When is the EI Due?

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- March 31<sup>st</sup> for sites that submitted an EI the previous year (annual updates), unless otherwise directed in writing by the TCEQ
- March 31<sup>st</sup> for sites that did not submit an EI the previous year but are applicable to reporting requirements
- For RY 2018, the EI is due March 31, 2019



# EI Process/Timeline Overview

Calendar Year Data is Transmitted to Environmental Protection Agency by the TCEQ

Ongoing TCEQ Review of Submitted Data



EI (All types) Due March 31\*\*

Contaminant Summary Reports Mailed to Sites as Reviews are Completed

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



# Air Contaminants to Report

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- Criteria and precursor pollutants: Carbon monoxide, sulfur dioxide, VOC, NO<sub>x</sub> Pb, PM<sub>10</sub>, and PM<sub>2.5</sub>
  - PM<sub>10</sub>: particulate matter no larger than 10 microns in diameter
  - PM<sub>2.5</sub>: particulate matter no larger than 2.5 microns in diameter
- HAPs identified in FCAA, Section 112(b)
  - Examples include mercury, hydrogen fluoride, and hydrochloric acid
- Other regulated air contaminants subject to rules, regulations, permits, orders of the commission, or court orders
  - Examples include total suspended particulate and non-HAP acids



# What Supporting Documentations Should be Submitted with the EI?

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- Information about the site and its processes
- Sample calculations are required by 30 TAC Section 101.10
  - Follow the TCEQ guidance for choosing the best available determination method
  - Site-specific and use current inventory year's data
  - Update sample calculations with each EI submittal
  - Submit for each different process type
  - Process rates, operating hours, emission factors, and their sources
- Emissions data reported in the EI are the **actual** emissions **not** the **potential** emissions or maximum emissions from the permit.



# How is **Confidential** Supporting Documentation Handled?

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- Mail the confidential supporting documentation. Do not e-mail or attach confidential information to the Web-EI submission.
- USPS: Emissions Inventory Data, MC 166  
TCEQ  
PO Box 13087  
Austin, TX 78711-3087

Overnight: Emissions Inventory Data, MC 166  
TCEQ  
12100 Park 35 Circle, Bldg. E., Third Floor  
Austin, Texas 78753

- Note: The data contained in the EI is public.



# Emissions Inventory Resources

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- EI guidelines book (RG-360/17) provides:
  - Step-by-step instructions for completing an EI
  - Yearly updates with current reporting requirements
  - Technical supplements for common emissions sources
- Sample calculation templates for common sources types
- Web-based EI reporting instructions and YouTube videos
- EI Workshop in January 2019 at the JJ Pickle Center in Austin, Texas



# Emissions Inventory Resources (cont.)

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- All guidance documents, presentations, helpful links and more at:  
[www.tceq.texas.gov/goto/ieas](http://www.tceq.texas.gov/goto/ieas)
- Emissions Assessment Section Help Line:  
(512) 239-1773 / [psinvent@tceq.texas.gov](mailto:psinvent@tceq.texas.gov)
- TCEQ Events:  
<https://www.tceq.texas.gov/p2/events>
- Jill Dickey-Hull:  
(512) 239-5912 / [jill.dickey@tceq.texas.gov](mailto:jill.dickey@tceq.texas.gov)