

Emissions Inventories: An Overview

Office of Air, Air Quality Division

Presented to the Texas Commission on Environmental Quality (TCEQ) Environmental Trade Fair and Conference May 14, 2019



Overview





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



Emission inventories are developed for a variety of purposes, including:

- State Implementation Plan development
- Photochemical modeling
- Developing strategies and policies
 - Analyze ozone precursor emissions in ozone nonattainment areas to assess control strategy implementation
 - Model predicted emissions reductions
- Evaluating the environmental costs and benefits of different policies

Use EI data to obtain a cost per ton of pollutant reduced





How Does the TCEQ Use Its EI? (cont.)

Emission inventories are developed for a variety of purposes.

- Tracking progress of air quality standards
 Compare emissions trends to ambient air monitoring data
- Meet required federal reporting
- Fee assessment
- Providing emissions information to public and private entities
- Other air quality planning efforts





Developed from industry-reported emissions

<u>Point source</u>: large upstream oil and gas, power plants, cement plants

TCEQ-developed emissions inventories

- <u>Area source</u>: dry cleaners, drilling rigs, gas stations, small upstream oil and gas
- <u>On-road mobile</u>: cars and trucks
- Non-road mobile: planes, trains, marine
- <u>Biogenic</u>: vegetation, soil



30 Texas Administrative Code (TAC) Section 101.10

EI rule organization

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



Which One is the Point Source?





What information is needed to determine if a site meets the reporting requirements of 30 TAC Section 101.10?

- Potential To Emit (PTE) and actual emissions thresholds for regulated pollutants
- PTE and actual emissions thresholds for hazardous air pollutants (HAP)

– Site location and attainment status of county



Statewide Applicability Requirements:

Major stationary source defined under 30 TAC Section 116.12, Nonattainment and Prevention of Significant Deterioration:

- The rule defines **PTE** thresholds.

 The major source classification changes based on the attainment status of county.



Statewide Applicability Requirements (cont.):

- 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, Section 112(a)(1)
- Any account that emits or has the PTE 0.5 tpy of lead (Pb)



Special Inventory Applicability Requirements:

- Only regulated entities that receive a written notification from the TCEQ
- Respond to the letter even if the site does not meet reporting thresholds
- Current special EI for ozone precursors Account that emits least 10 tpy of volatile organic compounds (VOC) or 25 tpy of nitrogen oxides (NO_X) emissions during normal operation and that are located in one of the specified counties on the next slide



Special Inventory Applicability Requirements (cont.):

2018 Reporting Year (RY) special EI counties for ozone precursors:

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



Ozone Nonattainment Areas Applicability Requirements:

- Any account located in an ozone nonattainment area emitting
 - 10 tpy or more of VOC,
 - 25 tpy or more of $NO_{\rm X}\text{,}$ or
 - 100 tpy or more of any other contaminant subject to the National Ambient Air Quality Standards
- Starting with the 2018 RY, Bexar County is marginal ozone nonattainment under the 2015 Ozone Standard.



Summary of 2018 Reporting Thresholds

Su	mmary c	of Reporti	ng Requi	rements	(tpy) for	· 30 TAC 9	Section 1	L01.10		
Note: For ozone nonattainn	nent areas					on (where a ial emission) is used to	determine	reporting
					•					
County	V	C	N	o _x	Ot	her	Individ	ual HAP	Aggrega	ated HAP
	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential
Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller MODERATE / OZONE	10	100	25	100	100	100	10	10	25	25
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise MODERATE / OZONE	10	100	25	100	100	100	10	10	25	25
Bexar MARGINAL / OZONE	10	100	25	100	100	100	10	10	25	25
SPECIAL INVENTORY REPORTING THRESHOLDS FOR OZONE PRECURSORS	10	100	25	100	100	100	10	10	25	25
All Other Counties	100	100	100	100	100	100	10	10	25	25
Statewide		Lea	ad (Pb) Act	ual			Lea	ad (Pb) Pote	ential	
REPORTING THRESHOLDS FOR LEAD (All counties)			0.5					10		



Common scenario: An operational major source voided the site's applicable permits in June 2018.

- The site met 30 TAC Section 101.10 PTE reporting thresholds.
- The site must submit a 2018 EI.
- The 2019 EI may not be required if the site does not meet any of the 30 TAC Section 101.10 reporting requirements.



Point Source EI Types

- Initial
- Annual update
- Special



- Sites that have never submitted an inventory
- Required to be submitted through the State of Texas Environmental Electronic Reporting System (STEERS) Annual Emissions Inventory Reporting Web-based system (AEIR)

Also referred to "Web-EI"

• Due by March 31st



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



- Only regulated entities that receive a written notification from the TCEQ
- Respond to the letter even if the site does not meet reporting threshold
- Current special EI is for ozone precursors
 - No difference in the type of EI data, same format as the initial and annual EI updates
 - Counties listed on slide 13



What is Web-EI?

STEERS: the Framework

- Web portal for reporting numerous types of environmental data electronically to the TCEQ
 - Manages items such as:
 - User accounts
 - Security settings
 - Different program areas have specific application or reporting functions within STEERS
- STEERS accounts (ER##### format) are user based.
 - Assigned to individuals
 - Don't confuse with Air Account Numbers or Regulated Entity Reference Numbers



What is Web-EI? (cont.)

AEIR: the Program

- Two-pronged system allows for:
 - Direct entry of EI data (manual/Emissions Inventory Questionnaire entry option)
 - Upload of data in a single text file (file upload option)
 Often referred to as electronic or delta file method
- Document attachment function to submit nonconfidential information

Confidential supporting documentation <u>must</u> be sent via the United States Postal Service

Note: Screen shots are from STEERS test environment. Live system is at: <u>https://www3.tceq.texas.gov/steers/</u>



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

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: <u>Air Emissions and Maintenance Events (AEME)</u> <u>Annual Emissions Inventory Report (AEIR)</u>

OR

Select e-Permits Program Area: Air New Source Review (EPR_NSR)

STEERS News:

There are no current news items.



EERS Access elect STEERS Program to Add or	Modify: Annua	I Emissions In	nventory Report (AEIR)	•	Go
Current Program Area	<u>Program</u>	<u># IDs</u>			
ir Emissions and Maintenance Events	AEME	3			
ir New Source Review	EPR_NSR	N/A			
nnual Emissions Inventory Report	AEIR	7			



What is Web-EI? (cont.) Getting AEIR Access

- Read and follow onscreen prompts Especially for Access Type and Authorization
- Access Type (Levels of Authority)
 - Read View data only
 - Edit Enter and edit data within STEERS
 - <u>Submit</u> Certify and submit data to the TCEQ
- Authorization
 - Yourself Self-authorization
 - Another person Requires this person's verification
- AEIR IDs to Add



🛨 TCEQ STEERS - Online Pa 🗙 📉

← → C 🏠 🗎 Secure | https://www3tst.tceq.texas.gov/steers/index.cfm?fuseaction=pgmidadmin.addnewids&pgm_area_id=14&log=52658

8

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X

AEIR IDs to Add:

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

Enter the air IDs the account needs to access.

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

Add IDs Cancel	
C opy IDs from another account. The other account holder must be employed by the same company. An account number starts with ER and i followed by 6 numbers.	s
Account Number:	
Copy IDs Cancel	



STEERS Participation Agreement (SPA)

- The SPA document must be signed by each STEERS user by either:
 - paper signature; or
 - electronic signature using valid Texas driver's license.
- The SPA certifies that you understand and agree to all rules and requirements of STEERS and the programs you will access.
- Must be submitted for:
 - new STEERS accounts; and
 - existing STEERS accounts when updating or adding new access.
- Accounts are on probation until the SPA is submitted.





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

Г	-Account S	Summary		
	Account:	ER001175	Account Status:	ACTIVE - unlocked
	Name:	David Bulloch I	Created:	02/14/2014
	Company:	TCEQ	Activated:	02/14/2014
	Title:	TESTER	Last Renewed:	08/14/2017
	Email:	adam.bullock@tceq.texas.gov		
	Phone:	512-659-7777		
	Address:	5504 JOE SAYERS ASUTIN, TX 78756		

-STEERS Access

Select STEERS Program to Add or	Modify: Sele	ect program to	add or modify
Current Program Area	<u>Program</u>	<u># IDs</u>	<u># Probationary</u>
Air Emissions and Maintenance Events	AEME	3	0
Air New Source Review	EPR_NSR	N/A	0
Annual Emissions Inventory Report	AEIR	2	2



Who's Responsible for Submitting the EI?

- The owner or operator of the site at the time the inventory is due is responsible for submitting the EI.
- The person with <u>Submit Authority</u> in STEERS submits and certifies the EI data or signs inapplicability or insignificant change letter.
 - Title V sites
 - Responsible Official
 - Duly Authorized Representative
 - Non-Title V sites

Managers or personnel with authority to represent the company or facility

• Consultants may not submit the EI for a company.

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Who's Responsible for Submitting the EI? (cont.)

 Don't forget to update your information with the TCEQ when you buy or sell a site.



- Complete a CORE data form and send to TCEQ Central Registry <u>https://www.tceq.texas.gov/permitting/central_regist</u> <u>ry/guidance.html</u>
- (512) 239-5175 or registery@tceq.texas.gov
- Keep your EI contact information up-to-date
 - Update through STEERS or
 - Contact the Emissions Assessment Section (512) 239-1773 or <u>psinvent@tceq.texas.gov</u>





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What Sources Need to be Included in the EI?

Represent sources individually if:

- required to include the source by any TCEQ enforceable document
- emitted 1 tpy or more of any regulated pollutant
- emitted 0.1 tpy or more of toxics or HAPs
- Mercury and Pb exception: 2 pounds or more per year





What Sources Need to be Included in the EI? (cont.)

- Small emissions sources <u>must</u> be reported in the EI if the sum of the emissions meets or exceeds 5 tpy of regulated pollutants or 1 tpy of aggregate HAPs.
- These sources may be added individually or as a group.



What Sources Need to be Included in the EI? (cont.)

Small emissions sources can be grouped as a collective source if they meet all of the following criteria:

- Have similar source classification codes;
- Each emitted < 1 tpy of each regulated pollutant;
- Each emitted < 0.1 tpy or more of any toxic chemical or hazardous air pollutant; and
- Each emitted < 0.001 tpy or more of mercury or Pb.

Note: If small sources or small facilities are grouped in the regulated entity's air permits, group these sources as collective FINs in a similar manner when adding them to the EI.



Basic EI Structure Terms

- Structure: The relationship of emissions sources, emissions points, abatement devices, and related emissions data
- Facility: A stationary source capable of generating emissions

FIN: Facility Identification Number – an alphanumeric label for the facility

• Emissions Point: The physical location where emissions are released into the atmosphere

EPN: Emissions Point Number – an alphanumeric label for the emissions point


Abatement Device: A device or activity used to reduce emissions

CIN: Control Identification Number – an alphanumeric label for the abatement device

• Emissions Path: The route a pollutant takes from its origin, through its abatement device (if applicable), to its release into the atmosphere

The association of one FIN, any applicable CIN(s), and one EPN



Basic Emissions Paths







Which Emissions are Reported?

- Criteria and precursor pollutants: Carbon monoxide, sulfur dioxide, VOC, NO_X, Pb, PM₁₀, and PM_{2.5}.
 - PM₁₀: particulate matter no larger than 10 microns in diameter
 - PM_{2,5}: particulate matter no larger than 2.5 microns in diameter
- HAPs identified in Federal Clean Air Act, Section 112(b)

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 Type of Emissions are Reported?

- Four types of **actual** emissions are collected:
 - Annual (routine) emissions in tpy;
 - ozone season emissions in pounds per day;
 Sites in El Paso and located east of the 100 longitude line
 - scheduled maintenance start-up shutdown in tpy; and
 - emissions events in tpy.
- Emissions data reported in the EI are the actual emissions not the potential emissions or maximum emissions from the permit.



Using the Best Available Data

General Ranking for Emissions Determination Methods (in Descending Order):

- D Continuous emissions monitoring systems (CEMS)*
- H Highly reactive volatile organic compounds monitoring systems
- F Predictive emissions monitoring systems
- M Measured (stack sampling) data
- Q Portable analyzer measurement data
- V Vendor-supplied emissions factors
- A AP-42 and other factors approved by the United States Environmental Protection Agency or TCEQ
- B Material Balance
- S Scientific Calculation
- E Estimation
- O Other

*Note: if properly operated and calibrated CEMS data is available, it must be used to determine emissions per 30 Texas Administrative Code Section 101.10(c).



What Supporting Documentation Should be Submitted with the EI?

- Information about the site and its processes
- Sample calculations required by 30 TAC Section 101.10
 - 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



How is **Confidential** Supporting Documentation Handled?

- Mail confidential information. Do not email 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.



Point Source EI Resources

- Point Source EI webpage has the following and much more! <u>www.tceq.texas.gov/goto/ieas</u>
- EI guidelines book (RG-360/18) provides:
 - Step-by-step instructions for completing an EI
 - Yearly updates with current reporting requirements
 - Technical supplements for common emissions sources
- EI Workshop presentations
- How to obtain site specific EI reports: <u>https://www.tceq.texas.gov/assets/public/impl</u> <u>ementation/air/ie/pseiforms/eiq-print-copy.pdf</u>

- 🔍 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
- 🙆 About Us
- ≳ Contact Us

How are we doing? Take our

customer satisfaction survey

>> Questions or Comments: aqp@tceq.texas.gov

Point Source Emissions Inventory

Summary data and other information related to the TCEQ's Point Source Emissions Inventory.

The Point Source Emissions Inventory is an annual survey of chemical plants, refineries, electric utility plants and other industrial sites that meet the reporting criteria in the TCEQ emissions inventory rule (**30 TAC §101.10** ^[]).

This Web page provides point source emissions inventory data along with tools and information of use to companies completing their annual Emissions Inventory questionnaires.

Completing and Submitting a Point Source Emissions Inventory

Many of the documents linked from this page are in Portable Document Format (PDF) or in Excel (xls) format, among others. (Help with **PDF**.)

៘ Web-based EI Reporting Instructions now available on the TCEQ YouTube Channel

- 2018 Emissions Inventory Guidelines (Revised 12/19/18)
 - Emissions Inventory Checklist (PDF)
 - Contacting the EAS (PDF)
- Emissions Inventory Reporting Requirements Map and Summary Table (PDF) (Updated 12/19/2018)
- Sample 2018 Emissions Inventory Notification Letter and Attachments (PDF)
- 2018 Electronic Reporting Extract Files (Updated 12/14/2018)
- Status of the 2018 Emissions Inventory (Excel 166k)
- UPDATE The 2019 Emissions Inventory Workshop will be held on January 24, 2019 in Austin, Texas.





Point Source EI Resources (cont.)

- Emissions Assessment Section Help Line: (512) 239-1773
 psinvent@tceq.texas.gov
- Jill Dickey-Hull: (512) 239-5912 jill.dickey@tceq.texas.gov
- STEERS (non-AEIR items): (512) 239-6925
 <u>steers@tceq.texas.gov</u>



Area Source and Mobile Source EI

- The area and mobile source emissions inventories are developed in accordance with the requirements of the Air Emissions Reporting Requirements per 40 Code of Federal Regulations Part 51.
- Emissions estimates for area and mobile sources are developed through the use of United States Environmental Protection Agency (EPA) default emissions estimates, TCEQ-contracted projects, and TCEQ staff projects.



Area Source EI

Area Source (Nonpoint)

- Stationary emissions sources that do not meet the reporting requirements for point sources are classified as area sources.
- Area sources are:
 - Small-scale stationary industrial, commercial, and residential sources that generate emissions.
 - Calculated as county-wide totals rather than as individual sources.
 - Typically calculated by multiplying an established emissions factor (emissions per unit of activity) by activity or activity surrogate.



Area Source EI (cont.)

Area source classes include but are not limited to:

- Oil and gas exploration and production
- Consumer and commercial products
- Surface coating
- Dry cleaning
- Commercial and institutional combustion
- Residential combustion
- Graphic arts



Area Source EI (cont.)

- Area sources emissions rely on the appropriate activity or activity surrogate data.
 - Population
 - Amount of gasoline sold in an area
 - Employment by industry type
 - Crude oil or natural gas production
- Research continues to improve factors, refine characteristics, and update activity data.



Area source related studies include:

- Industrial, Commercial, and Institutional (ICI)
 Fuel Use Study (July, 2017)
- Area Source Asphalt Paving Project (June 2017)
- Growth Factors for Area and Point Sources (September 2016)
- Specified Oil and Gas Well Activities Emissions Inventory Update (August 2014)



Mobile Sources are non-stationary sources that emit pollutants into the air.

- On-road mobile:
 - Automobiles, trucks, motorcycles, and other vehicles traveling on public roadways
- Non-road mobile:

Aircraft, Locomotives, Drilling Rigs, Commercial Marine Vessels, Agricultural Equipment, Construction Equipment, Lawn and Garden Equipment, and Recreational Equipment



On-road Mobile Sources

On-road mobile source emissions are estimated by using the Motor Vehicle Emissions Simulator Model (MOVES).

- EPA-approved model can be used in either inventory mode or emissions rate mode.
- Model input requirements include:
 - Fuel study data (Mobile Source Team)
 - Meteorological data (Weather.gov)
 - Vehicle miles traveled (Travel Demand Model)
 - Link based speed data (Speed Models)
 - Vehicle registration data (Department of Public Safety)
 - HPMS (Highway Performance Monitoring System)
 - Control measures



Non-road mobile source emissions are estimated by using the MOVES Non-road Model.

- EPA-approved model is used to estimate emissions for non-road mobile sources (260 equipment types).
 Input requirements include:
 - Fuel study data (Mobile Source Team)
 - Meteorological data (Weather.gov)
- Aviation Environmental Design Tool is used to estimate commercial and military aircraft take off and landing emissions as well as emissions from ground support equipment.



- Locomotives and Rail Yards:
 - Uses survey work to obtain fuel usage activity data
 - Submitted to the EPA as a county-based inventory
- Commercial Marine Vessels:
 - Uses activity data including vessel characteristics data coupled with Automatic Identification System geographic positioning data to estimate emissions
 - Submitted to the EPA as a link-based inventory



- Drilling Rigs:
 - Uses oil and gas production data from the Texas Railroad Commission
 - Drilling rig equipment profiles allow for refined estimation of emissions by county.



Project Reports posted on the TCEQ website

• Air Quality Research and Contract Reports can be found at:

<u>http://www.tceq.texas.gov/airquality/airmod/proje</u> <u>ct/pj_report_ei.html</u>

- Reports include:
 - 2010 TCEQ Flare Study
 - Flash emissions from upstream oil and gas tanks
 - Developed drilling rig emissions inventories
 - Oil and gas calculator
 - Rail yard activity study: Development of truck activity and on-road emissions estimates for four Texas intermodal facilities
 - Residential Non-wood Combustion inventory
 - Industrial, Commercial, and Institutional Fuel Use

Texas VOC Emissions Trends

2,500,000

Source: Air Quality Division Updated: 3/18/2019





Texas NO_x Emissions Trends



Dallas-Fort Worth 10-County Nonattainment Area VOC Emissions Trends





Houston-Galveston-Brazoria 8-County Nonattainment Area VOC Emissions



Houston-Galveston-Brazoria 8-County Nonattainment Area NO_x Emissions Trends



El Paso County VOC Emissions Trends

18,000

Source: Air Quality Division Updated: 3/18/2019


El Paso County NO_x Emissions Trends

Source: Air Quality Division Updated: 3/18/2019





Beaumont-Port Arthur Area VOC Emissions Trends



Beaumont-Port Arthur Area NO_x Emissions Trends

60,000

Source: Air Quality Division Updated: 3/18/2019





Bexar County VOC Emissions Trends

Source: Air Quality Division Updated: 3/18/2019





Bexar County NO_x Emissions Trends

Source: Air Quality Division Updated: 3/18/2019





Austin Area VOC Emissions Trends

Source: Air Quality Division Updated: 3/18/2019





Austin Area NO_x Emissions Trends

Source: Air Quality Division Updated: 3/18/2019




Non-point and Mobile Source Emissions Contact Information

Matthew Southard: (512) 239-1046 <u>Matthew.Southard@tceq.texas.gov</u>

Air Success Web Page:

https://www.tceq.texas.gov/airquality/airs uccess