

Reportable Event/Activity Notification/Reporting Form

INTRODUCTION

These instructions along with the referenced form are provided as summary information only. Always refer to the most current version of the applicable rules when preparing and submitting any required information.

Always comply with all applicable legal provisions, including the rules relating to Emissions Events (EEs), Excess Opacity Events (EOE), and Scheduled Maintenance, Startup and Shutdown (SMSSA) notification and reporting requirements which are found in the following sections of 30 TAC Chapter 101:

- §101.1, relating to Definitions;
- §101.201, relating to Emissions Event (Upset events and unscheduled maintenance, unscheduled startup and unscheduled shutdown activities) Reporting and Recordkeeping Requirements (this section also includes EOE information);
- §101.211 relating to Scheduled Maintenance, Scheduled Start-up and Scheduled Shutdown Reporting, Recordkeeping, and Recordkeeping Requirements and;
- §§101.221 & 101.222 respectively relating to Operational Requirements and Demonstrations.

These rules are available for download from the Secretary of State web page as follows:

DisplayText cannot span more than one line!

WHEN, HOW, AND WHERE TO REPORT

When to submit Notifications and Reports

Companies with facilities experiencing reportable EEs, or EOE's are required to submit an initial notification **for each affected facility** not later than 24 hours after discovery of the "reportable" event in accordance with 30 TAC §§101.201(a)(2) or (e). Note that the term "facility" used in these rules refers to the term as defined in the Texas Clean Air Act (TH&SC §382.003(6)).

Companies expecting to perform certain maintenance, startup or shutdown activities are expected to submit a prior notification for the activity, as detailed in §101.211(a) **for each affected facility**. [Note: SMSSA

which do not meet the definition of "scheduled maintenance, startup, or shutdown activity" in §101.1(86) are considered to be emissions events, and are subject to the reporting and recordkeeping requirements applicable to emissions events, set forth in § 101.201.]

A final report is required to be submitted within 2 weeks after the end of a reportable emissions event or a reportable scheduled MSS activity (*see 30 TAC §§ 101.201(c) and 101.211(c), respectively*). Note that a single report may be used to satisfy both the initial and two week reporting requirements provided the report meets all deadlines and contains all the information required by both sets of requirements. In addition, because final reports for reportable emissions events are required to be submitted electronically after January 1, 2003, a single report submitted to comply with both the initial and final report requirements submitted after that date is required to be submitted electronically. The agency anticipates having the electronic reporting mechanism in place during the first calendar quarter of 2003; so beginning January 1, 2003 and continuing until the agency makes electronic reporting available, submittals are to be made by facsimile in accordance with the rules (*See 30 TAC §101.201(g)*).

How to submit Notifications and Reports

The agency's preferred way to notify or report is by facsimile copy utilizing this form. A faxed form is fast and provides a hard copy record of the notification or report for both the sender and recipient. The phase in of electronic reporting and notifications will begin during the first calendar quarter of 2003. At that time, electronic submittals will be via a web interface. E-mail will not meet the requirements of electronic reporting. You must be a registered user prior to making web-based submittal. See

<http://www.tnrcc.state.tx.us/permitting/forms/0710.pdf> for instructions on how to get registered. Registered users will receive email updates on the web based reporting interface or you can get the updates and the time line for future releases of the web based reporting system at the following web page: <http://www.tnrcc.state.tx.us/e-gov/events.html>.

Note that after January 1, 2003, any time the agency web based reporting is unavailable due to TCEQ difficulties, submittals must be made by facsimile as allowed by 30 TAC §101.201(g). Consult 30 TAC 101.201(g) for details on electronic submittals.

Where to submit

Notifications are required to be submitted to the TCEQ regional office *and* any appropriate local air pollution control agency whose jurisdiction includes the site experiencing the event or activity (*See 30 TAC §§101.201(a)(1)(B) and 101.211(a)*). Final reports are required to be submitted to the appropriate TCEQ regional office.

You can always get an up-to-date listing of the regional offices, including their mailing addresses, fax numbers and e-mail addresses, at the agency Web site:

<http://www.TCEQ.state.tx.us/admin/directory/region/reglist.html>

WHAT TO REPORT: COMPLETING THIS FORM

Accuracy and Completeness are Important

General Directions for the Form

- Be as specific as you can, complying with the notification and reporting requirements is one of the conditions for receiving an exemption for the event or activity.
- If a field on the form does not apply to the specific situation at hand, mark it N/A.
- The form is designed to be used in an initial notification for an EE, an EOE, or a planned SMSSA or as a final report for EEs and SMSSAs.
- **Please be aware that the rule requires information related to each facility to be reported individually.** This form is designed for reporting information about *a single facility only*. *Events that affect multiple facilities will require submittal of multiple forms.*

Please note that there are distinct legal requirements for EEs, EOE, and SMSSAs, and depending upon whether the submission is a notification or a report. Please refer directly to the applicable rules to ensure that your submission complies with all applicable legal requirements.

Field Specific Instructions

Each field on the form is described below:

Submittal Type

Mark an "x" in the appropriate box for the form's designation as either an initial notification or a final report. For electronic reporting purposes, the TCEQ web

interfaces (i.e. STEERS and public view query) will only identify initial notifications and final reports.

Name of Owner or Operator, Regulated Entity (RN)/Air Account (Acct) Number (#), Physical Location, Process Unit or Area, Facility and Emission Point Common Names

Provide the name of the owner or operator of the site and the air account number. Note that the TCEQ Regulated Entity Number (RN) is preferred as this is the means by which the TCEQ currently identifies air sources. The designated RN must identically match and correspond with the provided information in TCEQ Central Registry. Most sources with historic air account numbers (e.g. GG1234X) will have a regulated entity number, and this number should also be listed. Sources with no historic air account number will only be issued a RN. Some situations will occur where the regulated entity does not have either a RN or a historic air account number. If that is the case, this space may be marked N/A. Note that final reports should contain the RN. Contact your regional office for information on how to obtain a RN.

The physical location is intended to provide the best description of a physical address or geographic location where unauthorized emissions occur or are expected to occur. Physical location should be sufficiently descriptive so that an interested party could find the site on which the facility involved in the event or activity can be found. The names for a process unit/area, facility and emission point are names or identifiers commonly used among site operations personnel to describe the general area at the site where the facility involved in the EE, EOE, or SMSSA is located. The facility is the source of the unauthorized emissions, while the emissions point is the point at which the unauthorized emissions escape into the atmosphere. The site name may also be included in this space.

Facility Identification Number (FIN) or Emission Point Number (EPN)

While not every facility or emission point has agency-established identifiers, submittal of such numbers for facilities and emission points with relevant agency established identification numbers is required under 30 TAC §§101.201 and 101.211 when making appropriate submissions. Agency established identifiers are typically assigned during the permitting or emissions inventory processes. Consult the permit for permitted facilities to find the FIN and EPN. If the site is subject to the emissions inventory requirements of 30 TAC §101.10 and if the facility involved in the event is required to be listed in the emissions inventory for the site, provide the FIN and the EPN, for the emissions specific point of origin. The Industrial Emissions Assessment Section of

the TCEQ at (512) 239-1773 can answer general questions about the emissions inventory requirements. Their (If the unit involved in the event does not have agency established FIN's and EPN's then put N/A.)

Examples of identifying a source involved in an event follow:

Example 1

A site, subject to emissions inventory requirements, with a process commonly known as the "Coating Area" and with a coatings line commonly known as "line A" that is listed in the air permit number 12345 needs to identify the source. In the emissions inventory for that site, the FIN is listed as "LINEA" and an EPN called "INCINA". If unauthorized emissions occurred related to this site and involved emissions from this process due to incinerator malfunction then the identifications are as follows:

Process Unit Common Name:

Coating Area

Facility Common Name:

Line A

Emission Point Common Name:

Incinerator A

FIN: LINEA **EPN:** INCINA

Example 2

A site with a process unit named "Mayfair Compressor Station" which is *not* subject to emissions inventory requirements and has a compressor engine, "Engine 4," needs to identify the facility where an unauthorized release occurred through the Common Blowdown vent. The facility identification will be as follows:

Process Unit/Area Common Name:

Mayfair Compressor Station

Facility Common Name:

Engine 4

Emission Point Common Name:

Common Blowdown vent

FIN: N/A **EPN:** N/A

The Event / Activity Type

Please indicate the type of event or activity for which unauthorized emissions notification or reporting is being given by placing an 'x' appropriately.

Date and Time

Note: use the 24 hour clock (military time) to mark time.

The rules require that an *estimate* of the time of discovery

Website is as follows:

<http://www.tceq.state.tx.us/air/aqp/psei.html> and duration be provided, but if actual time is known, please provide that.

For emissions events and excess opacity events requiring notification, enter the date and time the incident was discovered.

For scheduled maintenance, startup or shutdown for which prior notification is being submitted, enter the date and time the activity is expected to begin.

For final records of a scheduled maintenance, startup or shutdown activity which has started or is completed, enter the date and time the activity actually started.

Duration of Event

Please indicate the duration of event as required by the rules. Use total hours and minutes. For events that last less than one minute use the seconds section, otherwise, disregard.

List of Compound Descriptive type(s) of Individually Listed or Mixtures of Air Contaminant Compounds Released, Including Opacity

Include in this field the compounds or mixtures released (or anticipated to be released) during this event or activity. The listed material should conform with those compounds and mixtures listed in the definition of reportable quantity (RQ), 30 TAC §101.1(84).

An EE or SMSSA initial *notification* requires that **each** air contaminant or air contaminant compound or mixture that was actually released or are expected to be released in amounts ***equal to or above the reportable quantity*** must be listed individually. Note that certain boilers and combustion turbines referenced in the definition of RQ's in 30 TAC §101.1(84), pursuant to 30 TAC §101.201(b)(3) and facilities with only an excess opacity event or activity need only to list opacity in the notification. (With reference to opacity, see also "Special Note on Events Involving Opacity" below.)

An EE and SMSSA submittal that constitutes a *final report* under the rules requires that ***all*** compounds or mixtures released to the atmosphere must be reported. The quantity value required to be reported is the quantity above zero, not the quantity above any applicable limit that may be imposed through rule or permit. If necessary, use additional sheets to report each compounds or mixtures that were released.

Estimated Total Quantity for Air Contaminants for Emissions/ Opacity Value for Opacity

When addressing emissions, report the total quantity of material released due to the event or activity. ***Report total quantity of material released, not only the quantity of material released above any authorized limits that may exist.*** When estimating emissions one should use monitoring data when that is available. When actual monitored data is not available, then estimation techniques consistent with that used in the preconstruction authorization application for the facility is next best, followed by the current emissions inventory guidance. In all cases, good engineering methodology is expected. Air contaminants must be reported in pounds.

Reporting Opacity

Note that opacity is generally measured in terms of percent of light blocked by (i.e., not allowed to transmit through) the emissions plume due to the non-moisture related air contaminants in that plume. A perfectly clear plume would normally have "0" % opacity, whereas a completely opaque plume (i.e., no light getting through the plume) would have an opacity of "100" %.

Where reporting opacity is required, EPA Reference Method 9 or a properly installed and operating continuous opacity monitor (COMs) is the best method for estimating opacity. Where neither EPA Reference Method 9 or a COMs are the data source, any valid means of estimating opacity is acceptable. Opacity should be reported in percent units. The quantity value required to be reported is the quantity above zero, not the quantity above any applicable limit that may be imposed through rule or permit.

Authorized Emissions Limit/Units

Emissions limits for compounds or mixtures are authorized by various permits, rules, and orders and are therefore stipulated by various methods utilizing units of measure such as pounds per hour (lbs./hr.), opacity exceedence greater than limit (%) for (x) minutes per hour, parts per million volume (ppmv), etc. Provide the measure of units noted as the authorized limitation.

Authorization (Rule or Permit No.)

Where the applicable rule requires, provide the preconstruction authorization number or rule citation of the standard permit, permit by rule, or other rule governing the facility.

Cause of Emissions Event / Reason for Scheduled Activity:

While only required if known for initial notification of

EE's and EOE's for which notification is required, the cause must be reported with all final reports. The narrative should be as precise as possible in the description of the cause of the EE or EOE, or of the reason for the SMSSA.

Actions Taken, or Being Taken, to Minimize and Correct the Emissions Event:

The narrative should be as precise as possible. Provide explicit information on how the company brought the unit back into compliance and how unauthorized emissions were controlled. Reference to attached external documentation can be given.

Basis used to Determine Quantities and Additional Information Necessary to Evaluate the Emissions Event:

This information is required for initial notifications of SMSSAs and for all final reports. It is expected that sufficient detail be provided to show how emissions estimates were determined. If necessary, one may reference specific external documentation, provided that such documentation is submitted concurrently with the report or is readily available in the current agency files.

Person Making Notification/Date and Time, Phone

Provide the name and phone number of the person making the notification and please give the date and time this person made the submittal.

Incident Contact Person, Phone/E-mail

Please provide the name and phone number of the person with direct knowledge of the circumstances related to the event or activity, and who should be contacted for additional information about this event. You can also provide an e-mail address which can be used for communication regarding this event or activity.

Jurisdiction(s) Notified

Please indicate the TCEQ regional office and any appropriate local air pollution control agency (a local program) that you are required to notify or report this event or activity to and which you have notified, or, by this notification, are notifying.