

# ORIENTATION PACKET

for those new to the  
PCAC Emissions Report

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# Why Emissions Reports?

Learn what CAC plants release to air

- Including pollutants contributing to ozone

Help public learn about chemicals in the community

Tool for helping CAC hold plants accountable

Plants may learn from their own reports and others

# PCAC Plants Exempt from Reporting and Reasons Why

## **TCEQ Emissions Inventory (EI)**

Evonik: Site's "potential to emit" is below the threshold of a major source requiring reporting

## **EPA Toxics Release Inventory (TRI)**

Reporting not required for type of industry

- ❖ Gulf Coast Authority

Terminals that do not produce products.

- ❖ ITC
- ❖ Kinder Morgan Export Terminal
- ❖ Kinder Morgan Liquids Terminal

# Common *Acronyms*

**EPA** – US Environmental Protection Agency

**TCEQ** – Texas Commission on Environmental Quality

**EI** – TCEQ Air Emissions Inventory

**TRI** – EPA Toxics Release Inventory

**NO<sub>x</sub>** – Nitrogen Oxides

**VOCs** – Volatile Organic Compounds

**HRVOC** – Highly Reactive Volatile Organic Compounds

**SO<sub>x</sub>** – Sulfur Oxides

**TSP** – Total Suspended Particulates

**CO** – Carbon monoxide

**TAR** – Turnaround

Additional Acronyms starting on page 15

# Report Contents

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## **TCEQ Air Emissions Inventory (EI)**

- Overall trends, plant-specific data, reasons for change

## **EPA Toxics Release Inventory (TRI)**

- Overall trends, plant-specific data, reasons for change

## **Comparisons for EI and TRI**

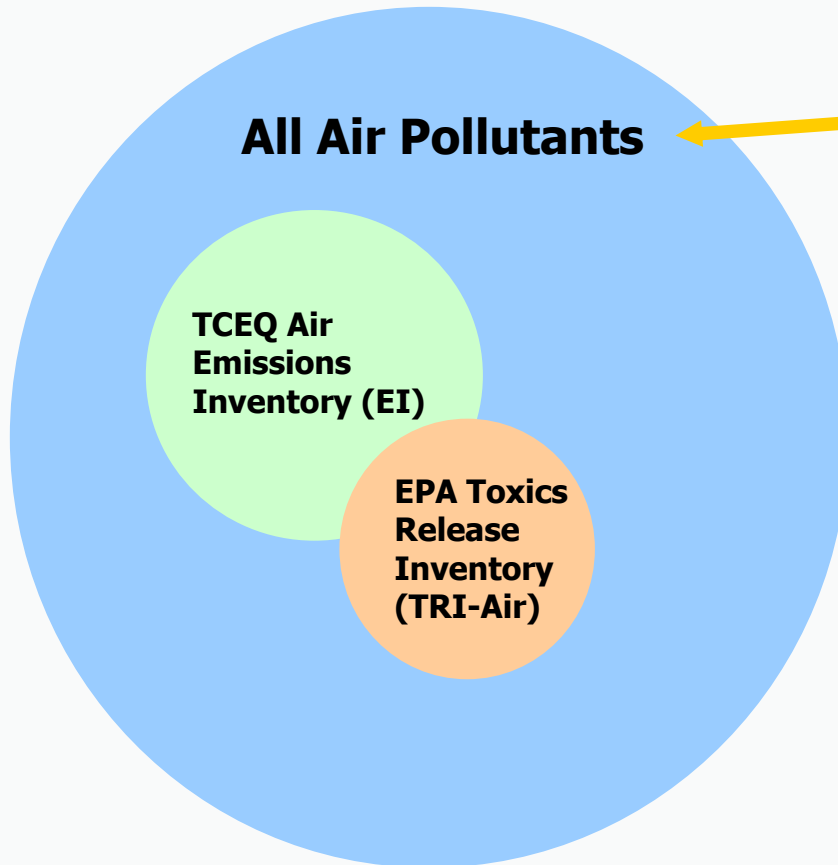
- 5 Year from 2018 to 2022
- 1 year from 2021 to 2022

## **5- and 10-year averages**

# Sources of Air Pollution

Sources include...

- **Industry** -- Chemical, petroleum refining, electric generation
- **Transportation** -- Cars and trucks, marine, aviation and trains. Off-road vehicles (construction)
- **Other** -- Small Businesses, homes
- **Biogenic Sources** -- Vegetation, fires, dust



*Not to scale*

# *Plant Sources of Air Emissions*

**From:** boilers, heaters, cooling towers, flares, loading & unloading, process vents, tanks, engines, vessels, wastewater treatment. . .

**During:** routine permitted activities (includes maintenance, startup and shutdown), upsets, spills. . .

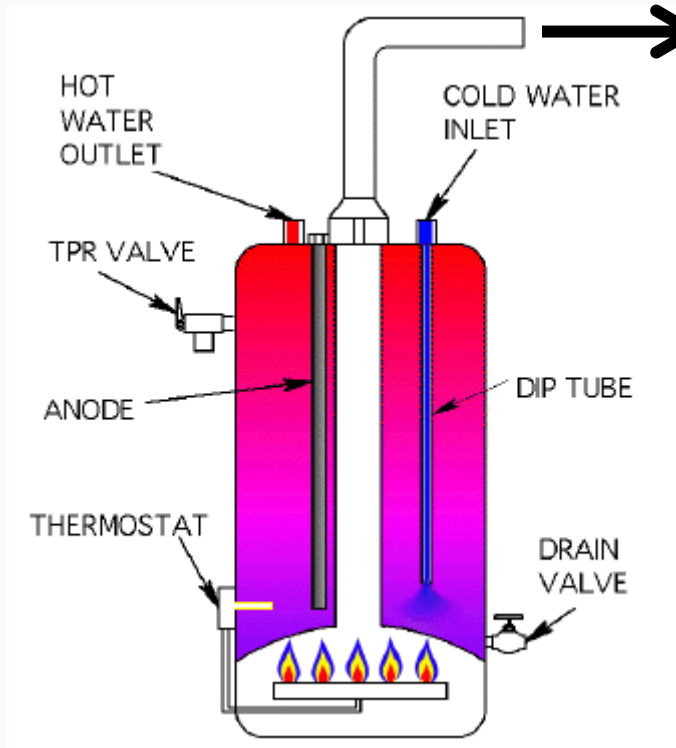
**Including:**

- Point sources
- Fugitive emissions



# Point vs. Fugitive Emission Sources

**Water Heater  
Point Source**



CO  
NO<sub>x</sub>  
VOC  
SO<sub>x</sub>

**Gas Meter  
13 Fugitive Sources**



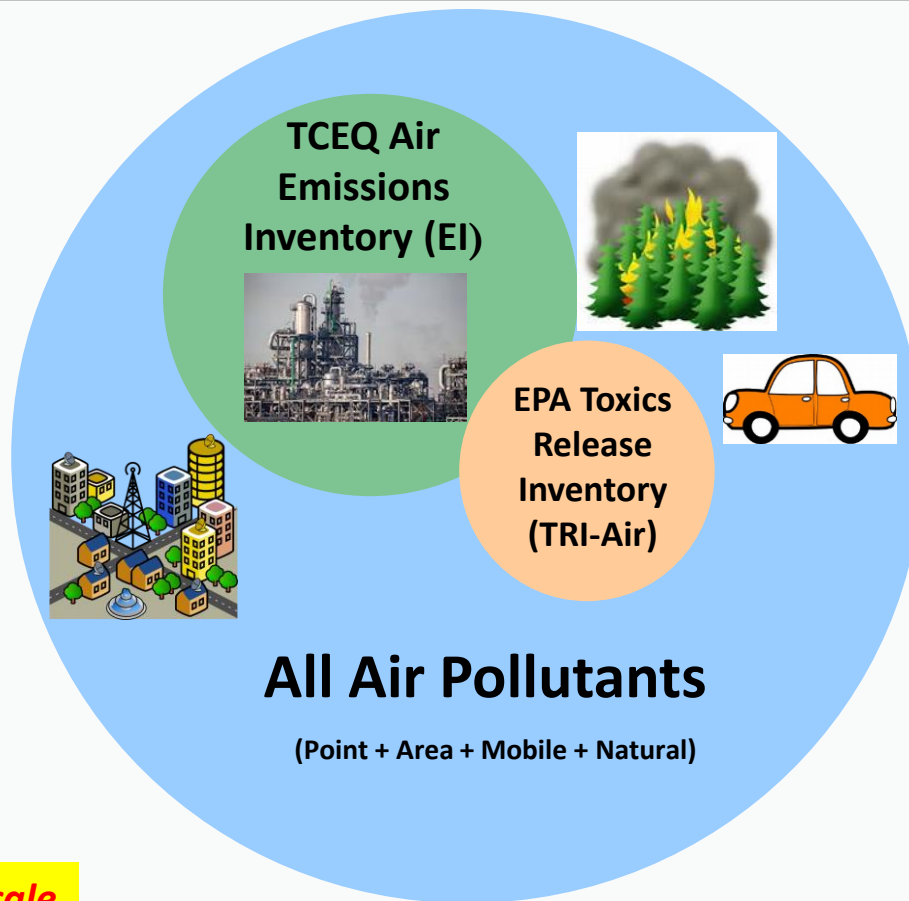
# Point vs. Fugitive Emission Sources



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# Where *Data* Come From

# Industry Reporting of Air Emissions



**EI and  
TRI  
Overlap**

***Not to scale***

# Data from Two Inventories

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## **TCEQ Air Emissions Inventory (EI)**

- Reported by major sources annually to Texas Commission on Environmental Quality (TCEQ)
- Just air -- all air releases of covered pollutants

## **EPA Toxics Release Inventory (TRI)**

- Reported annually to Environmental Protection Agency (EPA) by plants in certain kinds of business if plant has chemicals on TRI list above a set amount.
- Releases to environment (air, land, water) and transfers off the plant site for further waste treatment or disposal.
- PCAC report includes only TRI Releases to Air

# Comparing EI vs. TRI

## Air Emissions Inventory (EI)

- State requirement (TCEQ)
- *Contaminants released to Air*
- Required for permitting and compliance
- Almost all air contaminants (even small quantities)

## Toxics Release Inventory (TRI)

- Federal requirement (EPA)
- Contaminants released to *air, water, and land*
- Required for public right-to-know
- Approx. 820 chemicals that exceed specific thresholds

## ● Both reports

- Include point source and fugitive emission values
- Calculation methods including direct measurements, engineering estimates, and agency factors
- Include permitted and upset emissions
- Can show useful trends
- Small facilities are exempted



# Requirements for EI Reporting

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A plant must submit an EI if it meets any one of the following:

- Major Source
- In Harris County and emits at least 10 tons per year (tpy) VOC, 25 tpy NOx, or 100 tpy of any other contaminant
- Emits more than 0.5 tpy of lead (Pb)
- Potential to emit 10 tpy of a single (25 tpy aggregate) hazardous air pollutant
- Subject to a special inventory

# Criteria Air Pollutants in EI

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4 of the criteria air pollutants- subject to National Ambient Air Quality Standards (NAAQS)

- Nitrogen Oxides (NO<sub>x</sub>)- ozone precursor
- Sulfur Oxides (SO<sub>x</sub>)
- Carbon Monoxide (CO)
- Total Suspended Particulates (TSP)/PM 2.5

Volatile Organic Compounds (VOCs)- ozone precursors subject to other rules

- Highly Reactive VOCs (HRVOCs), a subset of VOCs, contribute more to ozone formation



# Requirements for TRI Reporting

Plants must report if:

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- the chemicals used in their processes are covered by the TRI program (approximately 820 chemicals)
- the plant makes more than 25,000 lbs. of a TRI chemical in a year
- the plant uses more than 10,000 lbs. of the TRI chemical in a year

# TRI for EPA vs. PCAC

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PCAC looks only at TRI releases to *air* to keep the report simple

## Plant reports to EPA include

- Releases to environment (air, land, water)
- Transfers off the plant site for further waste management or disposal
  - Ex: recycling or use as fuel, or landfilling
  - Internal recycling, reduction of emissions at the source, etc.
- Pollution Prevention Information

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# Where *Numbers* Come From

# Where Numbers Come From

## Combination of *measurements* and *estimates*

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**Measurements** from Continuous Emissions Monitoring Systems (CEMS), stack and vent tests, lab analysis, and other direct measurements

**Estimates** from calculations based on fuel consumption, mass balance of process, engineering calculations, throughput formulas, flow measurements, inventory loss, production data, and field surveys

- Fugitives often estimated by EPA's AP-42 factors
- Direct measurements may be incorporated into calculations

### **Changing calculation methods**

- Improves accuracy
- Affects emissions numbers positively or negatively

# Measurements

## Continuous Emission Monitoring System (CEMS)



**Only available for  
certain kinds of  
emissions**

**Most accurate way to  
quantify emissions**

**....and the most expensive  
to install & maintain**



# Emissions Measurement Example

## NOx emissions calculations basis

- NOx and CO CEMS data (concentration, ppmvd)
- Exhaust gas flow rate (dscfm)
- Molecular weight (lb/lb-mol)

### Boiler NOx example:

$$\frac{C_{\text{ppmvd}} * MW_{\text{lb/lb-mol}} * Q_{\text{dscfm}} * 60 \text{ min/hr}}{V_{\text{ideal gas, cf/lb-mol}} * 10^6} = \text{lb/hr}$$

$$\frac{17.86 * 46.1 * 19,150 * 60}{386.5 * 10^6} = 2.45 \text{ lb/hr NOx}$$

# Measurement + Calculation

## Fugitive VOC emissions calculation basis

- EPA Test Method 21 monitoring results
- EPA/TCEQ correlation equations
- Annual Leak Report

TABLE 2-9. SOCFI LEAK RATE/SCREENING VALUE CORRELATIONS

Equipment type	Correlation <sup>a,b</sup>
Gas valves	Leak rate (kg/hr) = $1.87\text{E-}06 \times (\text{SV})^{0.873}$
Light liquid valves	Leak rate (kg/hr) = $6.41\text{E-}06 \times (\text{SV})^{0.797}$
Light liquid pumps <sup>c</sup>	Leak rate (kg/hr) = $1.90\text{E-}05 \times (\text{SV})^{0.824}$
Connectors	Leak rate (kg/hr) = $3.05\text{E-}06 \times (\text{SV})^{0.885}$

<sup>a</sup>SV = Screening value in ppmv.

<sup>b</sup>These correlations predict total organic compound emission rates.

<sup>c</sup>The correlation for light liquid pumps can be applied to compressor seals, pressure relief valves, agitator seals, and heavy liquid pumps.



# Published Emission Factors

The screenshot shows the EPA website's page for 'AP-42: Compilation of Air Emission Factors'. The browser's address bar shows the URL: <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emission-factors>. A notification banner at the top states: 'We've made some changes to EPA.gov. If the information you are looking for is not here, you may be able to find it on the EPA Web Archive or the January 19, 2017 Web Snapshot.' The EPA logo and navigation menu are visible. The main heading is 'Air Emissions Factors and Quantification'. On the left, a sidebar lists: 'Air Emissions Factors and Quantification Home', 'Basic Information', 'AP-42' (highlighted), 'Emissions Estimation Tools', 'WebFIRE', and 'CHIEF Archives'. The main content area features the title 'AP-42: Compilation of Air Emission Factors' and a 'SHARE' button with social media icons. Below this, a 'CONTACT US' link and 'On This Page:' section are present. The 'On This Page:' section lists several links: 'Compilation of Air Pollutant Emission Factors (AP-42)', 'Proposed/Revised/New Emissions Factors', 'AP-42 Proposed Factors, But Not Finalized', 'AP-42, Fifth Edition Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources', 'Additional AP 42 Resources', 'Historical AP-42 Information', 'AP-42 Frequent Questions', and 'Older editions of AP-42, Volume 1'. A 'Top of Page' link is also visible. At the bottom, a light blue box contains the text 'Compilation of Air Pollutant Emission Factors (AP-42)'. Below this, a note states: 'AP-42, Compilation of Air Pollutant Emission Factors, has been published since 1972 as the primary'. The Windows taskbar at the bottom shows the time as 8:05 AM on 11/3/2017.

Emission factors are continuously revised and added!

AP-42, Compilation of Air Pollutant Emission Factors, has been published since 1972 as the primary



# Emission Factor Example

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO<sub>x</sub>) AND CARBON MONOXIDE (CO)  
FROM NATURAL GAS COMBUSTION<sup>a</sup>

Combustor Type (MMBtu/hr Heat Input) [SCC]	NO <sub>x</sub> <sup>b</sup>		CO	
	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating
Large Wall-Fired Boilers (>100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS) <sup>c</sup>	280	A	84	B
Uncontrolled (Post-NSPS) <sup>c</sup>	190	A	84	B
Controlled - Low NO <sub>x</sub> burners	140	A	84	B
Controlled - Flue gas recirculation	100	D	84	B
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	B	84	B
Controlled - Low NO <sub>x</sub> burners	50	D	84	B
Controlled - Low NO <sub>x</sub> burners/Flue gas recirculation	32	C	84	B
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	B	40	B

# Factors Causing Year-to-Year Variations

## **Actual long-term changes in emissions**

- Adding units or closing them
- Pollution prevention efforts – practices/equipment.

## **Making or storing a different mix of products**

- For example, more volatile materials may evaporate to the air

## **Production/customer demand -- up or down**

## **Maintenance and related shutdowns and startups**

## **Changing number of plants in PCAC**

## **Emission events: upsets, leaks and spills**

## **Changing calculation methods & emission factors**

## **Audits – continuous improvement**

## **Agency interactions – identify deficiencies**

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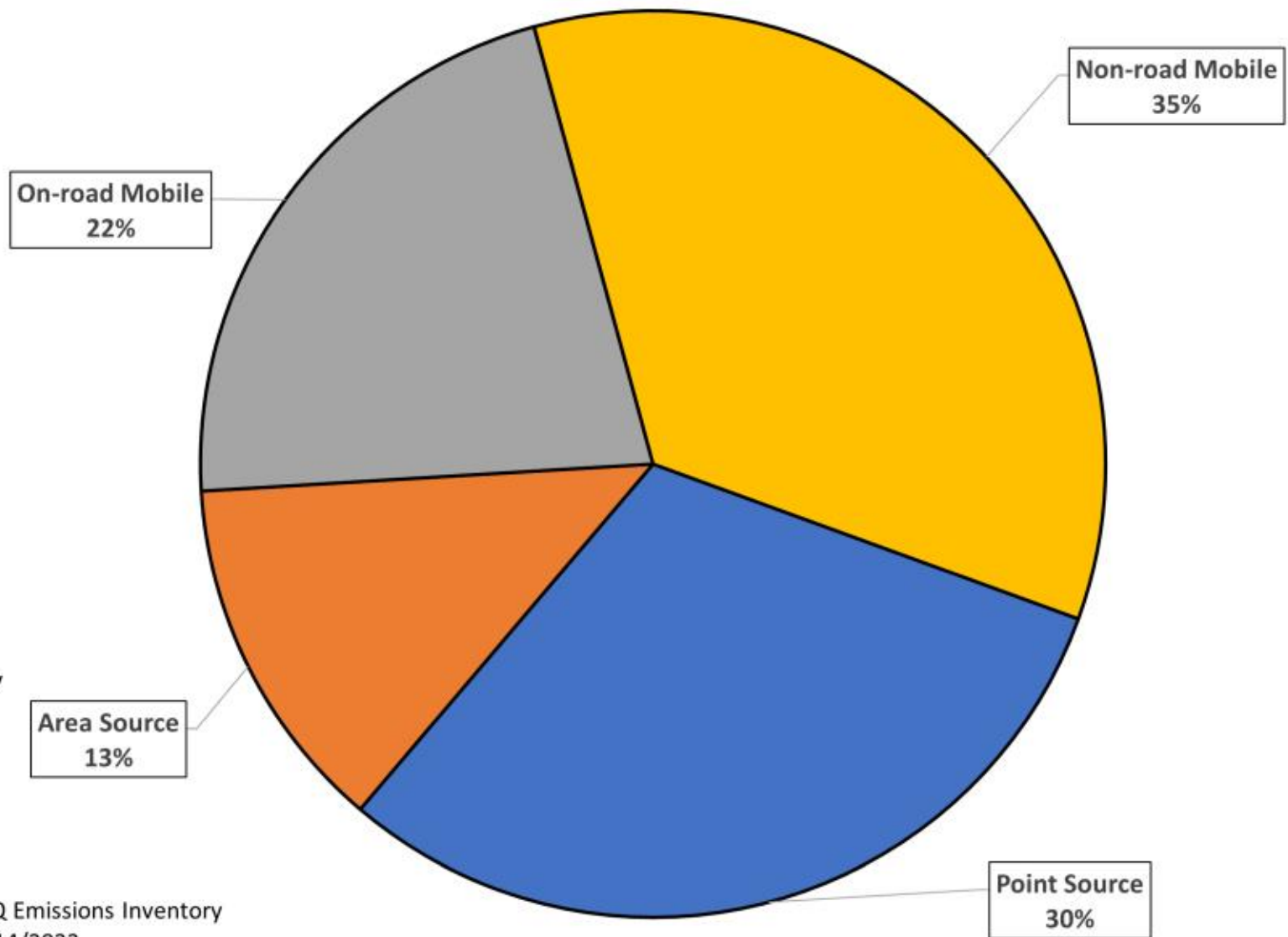
# TCEQ NOx and VOC Emission Charts

# TCEQ NOx and VOC Emission Charts

The pie charts on the following pages show the relative emissions of nitrogen oxides (NOx) and volatile organic compounds (VOCs) by source category. The charts are developed every three years based on the National Emissions Inventory and were last updated in 2020.

- **Point source** - large stationary sources such as fossil fuel fired power plants, smelters, industrial boilers, petroleum refineries, and manufacturing facilities
- **Area source** - small-scale industrial, commercial, and residential sources that generate emissions
- **mobile source** – 2 types
  - On-Road - automobiles, trucks, motorcycles, and other motor vehicles traveling on public roadways
  - Non-Road – agriculture & construction equipment, aircraft, trains, drilling rigs, etc...

## 2020 Houston-Galveston-Brazoria Area NO<sub>x</sub> Emissions

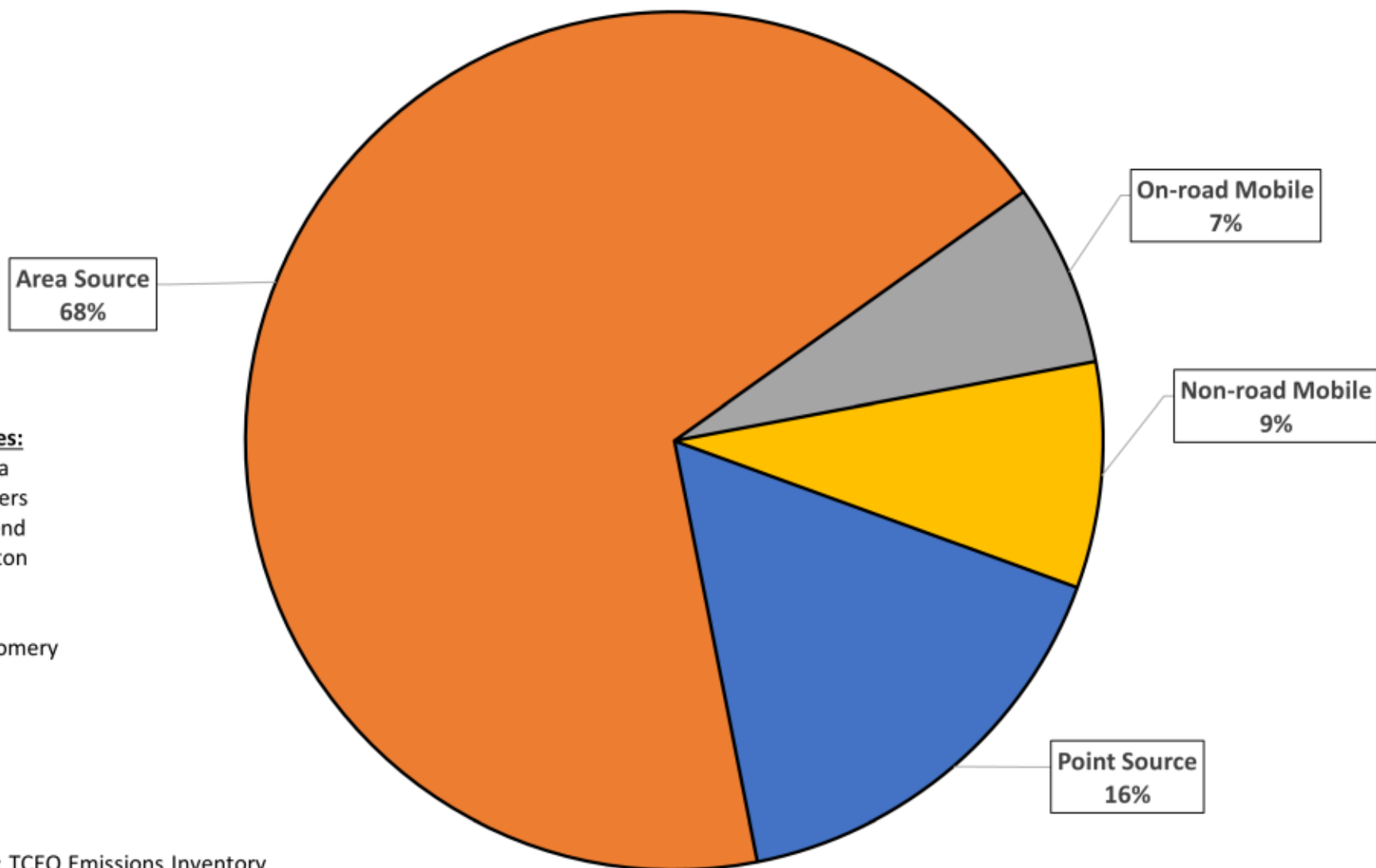


### Counties:

Brazoria  
Chambers  
Fort Bend  
Galveston  
Harris  
Liberty  
Montgomery  
Waller

Source: TCEQ Emissions Inventory  
Updated: 6/14/2022

## 2020 Houston-Galveston-Brazoria Area VOC Emissions



### Counties:

Brazoria  
Chambers  
Fort Bend  
Galveston  
Harris  
Liberty  
Montgomery  
Waller

Source: TCEQ Emissions Inventory  
Updated: 6/14/2022

# If You Want to Know More

**TCEQ:** [www.tceq.Texas.gov](http://www.tceq.Texas.gov)

## **EPA TRI Website**

TRI Program Home page: [www.epa.gov/tri](http://www.epa.gov/tri)

**Houston Regional Monitoring:** <http://hrm.aecom.com/>

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# Emissions and Air Monitoring Acronyms and Terms



# Emissions and Air Monitoring

## Acronyms and Terms

EE = emissions event

RTO = regenerative thermal oxidizer to reduce emissions to the atmosphere.

FGRS = Flare Gas Recovery System

MSS = maintenance, shut down, and startup

SCR = Selective Catalytic Reduction

TO = thermal oxidizer

WWT= wastewater treatment

WWTP= wastewater treatment plant

# Emissions and Air Monitoring

## Acronyms and Terms

**EI** Emissions Inventory filed with TCEQ for all criteria pollutants (and their precursors) and hazardous air pollutants, such as benzene and 1,3-butadiene

**TRI** Toxics Release Inventory, filed with EPA

**Emission:** Pollution discharged into the atmosphere from smokestacks, other vents, and surface areas of commercial or industrial facilities; from residential chimneys; and from motor vehicle, locomotive, or aircraft exhausts. (*EPA*)

**Release:** Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of a hazardous or toxic chemical or extremely hazardous substance. (*EPA*)

**Environment:** air, water, groundwater, and land

# Emissions and Air Monitoring

## Acronyms and Terms

### LDAR

Leak Detection and Repair. Fugitive emissions are controlled by looking for leaks and fixing them. *See gas meter (fugitives) vs. hot water heater (point sources).*

Delay of Repair (DOR) - common cause of fugitive emission increases when leaking component cannot be repaired without shutting down plant. More emissions would result from the shutdown than from delaying repair. Components can also be placed on DOR if it would be unsafe to attempt repair with chemicals in the process piping or equipment.

### TPY

Tons Per Year

# Emissions and Air Monitoring

## Acronyms and Terms

### *Criteria Pollutants and Precursors*

**Ozone** Respiratory irritant that may form in the atmosphere when NO<sub>x</sub> and VOCs come together on still, sunny days.

**NO<sub>x</sub>** Nitrogen Oxides. Nitrogen dioxide and other gases made of varying mixtures of nitrogen and oxygen. Formed when fuel is burned at high temperatures (*EPA*)

# Emissions and Air Monitoring

## Acronyms and Terms

### *Criteria Pollutants and Precursors*

**VOCs** Volatile Organic Compounds. *Volatiles* evaporate rapidly. *Organic Chemicals or Compounds* are naturally occurring (animal or plant-produced) or synthetic substances containing mainly carbon, hydrogen, nitrogen, and oxygen. VOCs are any organic compounds that participate in atmospheric photochemical reactions except those designated by EPA as having negligible photochemical reactivity. (EPA). Photochemical reactions are influenced or initiated by light. There are hundreds of VOCs, including common ones like ethylene, propylene, benzene, and formaldehyde. VOCs are found in many household products and are thus an indoor air quality interest.

**HRVOCs** Highly Reactive Volatile Organic Compounds. A subset of VOCs found to be more productive than other VOCs in forming ozone. TCEQ focus is ethylene, propylene, 1,3-butadiene, and butenes.

# Emissions and Air Monitoring

## Acronyms and Terms

### *Criteria Pollutants and Precursors*

**CO** Carbon Monoxide. Formed when fuel is not burned completely.

**TSP** Total Suspended Particulates. Mixture of solid particles and liquid drops found in the air. Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye. Others are so small, they can only be detected using a microscope.

**SOx** Sulfur Oxides (including sulfur dioxide and others in the family). Sulfur is prevalent in crude oil, coal, and ore that contains common metals like aluminum, copper, zinc, lead, and iron. SOx gases are formed when fuel containing sulfur, such as coal and oil, is burned; when gasoline is extracted from oil; or metals are extracted from ore.

# Emissions and Air Monitoring

## Acronyms and Terms

- HRM**     **H**ouston **R**egional **M**onitoring. Monitors air on behalf of industry members.
- HGB**     **H**ouston – **G**alveston – **B**razoria region
- NAAQS**   **N**ational **A**mbient **A**ir **Q**uality **S**tandards. States are required to meet these standards or bear the consequences. In the HGB area, Texas meets all but the ozone standard.
- SIP**     **S**tate **I**mplementation **P**lan. State's plan for bringing an area into attainment of the NAAQS.
- Concentration**   The amount of pollutant detected by the monitors is reported in parts per million by volume  
(**ppm-v**) or by parts per billion (**ppb-v**)
- AMCVs**   **A**ir **M**onitoring **C**omparison **V**alues. Level of a chemical in air set to prevent short-term and long-term health effects and nuisance odor conditions. ESLs are used for evaluating air permitting models. AMCVs are used for evaluating air monitoring data

# Emissions and Air Monitoring

## Acronyms and Terms

- ESLs**      **E**ffects **S**creening **L**evels. If trends at an air monitor exceed the TCEQ ESL for a compound, the agency may place it on the Air Pollutant Watch List to determine the sources and how to bring about reductions
- HAPs**      **H**azardous **A**ir **P**ollutants, the “air toxics” on which EPA focuses
- CAMS**      TCEQ **C**ontinuous **A**mbient **M**onitoring **S**tation
- PAMS**      **P**hotochemical **A**ssessment **M**onitoring **S**tation
- Auto GC**      Automated **g**as **c**hromatograph, continuous air monitoring *equipment*
- FTIR**      **F**ourier **T**ransform **I**nfra-**R**ed spectrometer, continuous air monitoring *equipment*



# Emissions and Air Monitoring

## Acronyms and Terms

**BTEX**     **B**enzene, **T**oluene, **E**thylbenzene, **X**ylenes. Four HAPs serving as surrogates for tracking trends of HAPs

**Benzene** is a colorless liquid with a sweet odor. It evaporates into the air very quickly and dissolves slightly in water. It is highly flammable and is formed from both natural processes and human activities. Benzene is widely used in the United States; it ranks in the top 20 chemicals for production volume. Some industries use benzene to make other chemicals which are used to make plastics, resins, and nylon and other synthetic fibers. Benzene is also used to make some types of rubbers, lubricants, dyes, detergents, drugs, and pesticides. Natural sources of benzene include emissions from volcanoes and forest fires. Benzene is also a natural part of crude oil, gasoline, and cigarette smoke. It is a known human carcinogen.  
*(From the federal Agency for Toxic Substances and Disease Registration)*