

# Guidance and Clarification for ECT-6H Submittals

## HECT Program Applicability

- Sites applicable for the receipt of allowances under the revised allocation methodology must:
  - ◆ Be subject to the Site-Wide Cap and Control and Monitoring and Testing requirements of Chapter 115 Divisions 1 and/or 2: §115.722, and §115.725, and/or §115.761 and §115.764, respectively; and either.
  - ◆ Have had a Potential to Emit (PTE) greater than 10 tons on December 24, 2004 - the effective date of the HECT program; or
  - ◆ Have opted-in to the original program by notifying the executive director in writing by April 30, 2005.
- Facilities subject to only the recordkeeping requirements of Chapter 115 Divisions 1 & 2 are not applicable to the HECT program and will not be eligible to receive an allowance allocation.
- The opt-in requirement of 2005 has not been extended and therefore sites with HRVOC emissions in Harris County that are not currently participating in the HECT program cannot opt-in to receive an allocation under the new methodology. Therefore, ECT-6H forms are required only from sites currently participating in the HECT program and have been submitting ECT-1H forms annually since 2007.
- Section IX of the ECT-6H form requires owners or operators to demonstrate that each facility listed is subject to the HECT program. Facility applicability will be determined according to the rule guidance provided below:
  - *The owner or operator of participating sites shall demonstrate that each FIN/EPN path is subject to the HECT program as per 30 TAC Chapter 101.391. Only facilities subject to the requirements in Sections 115.722 and 115.725 or Sections 115.761 and 115.764, as applicable, are covered by the HECT Program. Please enter the applicable Chapter 115 specification for all listed paths. Boilers, furnaces, engines, turbines, heaters, incinerators, and other units that combust HRVOC that are not exempted under §115.727(c)(3)(A) are applicable and should be included in Table 1.*

## Flare Control Efficiency Calculations

Section IX of the ECT-6H form requires owners or operators of participating HECT facilities to report the HRVOC destruction/control efficiency for flares and other units combusting HRVOC streams. Control efficiencies for flares must be calculated according to the requirements under §115.725. These calculations are to be based on the composition/ratio of various HRVOC species in the stream, the block one-hour average net heating value, and the exit velocity of the flare as specified under §115.725. Please ensure that all of these factors are correctly incorporated into the flare's control efficiency calculation methodology. Please provide the methodology and show the

calculations and factors, including total hours of operation below the net heating value or exit tip velocity requirements of 40 CFR 60.18 as specified under §115.725. If TCEQ staff reviewing the ECT-6H form cannot determine how the control efficiency was calculated, staff will assign the lowest flare control efficiency - 93%, specified under §115.725, for all operating hours until sufficient supplemental documentation clearly and adequately demonstrating the methodology for calculating the control efficiency is supplied.