

TCEQ HRVOC Stakeholder Group
HECT Program
Monday July 23, 2007, 1:30 - 3:30 p.m.
Houston-Galveston Area Council

Moderator: Cory Chism
Presenter: Steve Sun

Summary of items discussed at the meeting.

General Comments

- Stakeholders commented that these meetings need to be better advertised.
 - TCEQ noted that the SIP List Serve that was previously used to notify stakeholders of upcoming events is no longer being used by the TCEQ. TCEQ informed stakeholders that they could sign up for the GovDelivery updates through the SIP Web page to receive updates on future stakeholder events.
 - Other stakeholders commented that the GovDelivery link on the SIP Web page is broken but stakeholders can use the GovDelivery link on the TCEQ main Web page to register for updates.
 - TCEQ said they would have the broken link on the SIP Web page repaired.
 - Sign up for e-mail updates [here](#).
- Notes from today's meeting will be posted on the HRVOC Stakeholder Group Web page.

Special Inventory Survey

- Is a cooling tower monitor used to detect leaks considered controlled emissions for the purposes of responding to the special inventory questions?
 - Yes, the term "control" is a general term for any method you are implementing to control emissions. Unless the emissions qualify as emission events under §101.201, then please include them under the "Emission Events" column.
- Can companies provide additional information to clarify their answers to the special inventory survey based on insight from today's discussions?
 - Companies can e-mail additional information to Bryan Osborne during the next two weeks (i.e. on or before August 6, 2007).
- The Special Inventory survey did not have questions about process changes that have occurred since January 1, 2005, that may have reduced HRVOC emissions.
 - Companies that made these types of process changes provide Bryan Osborn with that information during the next two weeks (i.e. on or before August 6, 2007).

Current Issues with the HECT Program

- If a company has an emissions event that releases HRVOC the company is essentially penalized twice through both enforcement action and a reduction in their HRVOC allowances.

- Since it is not possible to predict an emissions event or unplanned MSS activities, companies don't want to sell their allowances in case they need those allowances to meet the cap if the facility does have an emissions event or unplanned MSS activities. Companies are holding on to their excess HRVOC allowances.
- Some companies are holding HRVOC allowances to help mitigate emissions events while a number of other companies have installed controls, some with 99% control efficiency, but still do not have sufficient HRVOC allowances to cover their normal operations.
- If the original allocation was in fact inequitable, how will the TCEQ handle the 2007 emissions since there are currently no HRVOC allowances available for purchase?
 - The ED has mentioned the possibility of using enforcement discretion to handle these instances.
- Is expanding the HRVOC cap currently an option?
 - Not at this time.
- What happens if a company sells a stream of allowances prior to reallocation and then after reallocation the company that sold the stream does not have enough allowances to cover their emissions? Would both the buyer and seller be penalized after reallocation?
 - The 2007 allowances have already been allocated will not be affected by the reallocation process. If there are any changes to allocations, based on our rule process the earliest that the reallocation could occur would be 2009.
 - Buyers and Sellers assume risks when conducting HRVOC stream trades. As with NOx stream trades under the MECT program, new regulatory changes at any time may alter the number of future allowances allocated to the stream.
- Phantom emissions from cooling tower monitoring systems are being recorded due to the minimum detection limit set in the HRVOC rules.
 - EPA will accept the use of one half of the minimum detection limit but may not accept the use of zero. Use of zero for non-detects is not normal.
 - Using ambient air from the plant during calibration may cause inaccuracy since that ambient plant air may contain fugitive VOC emissions.

Ideas for Future Reallocation

- The ideas on reallocation methodology would be better if the stakeholders had the opportunity to look at the results from the special inventory survey.
- Reallocation of HRVOC allowances based on only one year of monitored data may not provide a true picture of a facility's typical emissions.
 - A one time reallocation of the cap may not be adequate.
 - Facilities that currently do not have enough allowances to cover emissions from normal operations, even after the installation of controls do not want to wait for additional data before reallocation is considered.
 - Reallocation will not be based solely on the monitored emissions data. The monitored emissions data can be used as a reference point to see if inequities exist in the original cap allocation. Emissions data could also be grouped by emission event, normal operations, MSS, etc.

- It is not fair for a company that has reduced their HRVOC emissions through the use of controls to be penalized by having some of their HRVOC allowances taken away and given to a company that has not installed controls.
- The cost to install additional controls to further reduce HRVOC emissions should be considered.
- One idea was to have a cap in place only during the ozone season. Facilities could then conduct scheduled MSS activities during these times so that these emissions wouldn't reduce their HRVOC allowances.
- TCEQ asked what would be the timeline for a site to come into compliance with a reduced cap for that site.
 - The amount of time necessary would depend on the type and extent of control necessary to meet the new cap.
- If stakeholders have additional suggestions concerning the reallocation of HRVOC allowances they should e-mail those suggestions to Bryan Osborne by September 1, 2007, so that staff can incorporate those comments into their analysis.
- How many sites that emit HRVOC are claiming to have the potential to emit (PTE) less than 10 tpy, and of those facilities how many are loading facilities?
 - The TCEQ does not know of the number of sites that emit HRVOC and claim to have a PTE less than 10 tpy. The TCEQ will provide that information, if available.
- Given that HRVOC emissions are often episodic in nature, how much of the total HRVOC emissions in the HGB are episodic? Are these episodic HRVOC emissions correlated to high ozone days? If so, which HRVOC are contributing to the high ozone levels? If not, maybe the HRVOC rules were not based to accurate assumptions. Another stakeholder commented that the HRVOC rules have reduced the number of days that HGB exceeded the one-hour ozone and the eight-hour ozone standards and that HRVOC releases are correlated to elevated ozone levels.
 - The TCEQ will have the data analysis team provide some charts and graphs that illustrate the correlation between reduced HRVOC emissions and reduced ozone levels in the HGB area.
 - [Ozone Trend](#)
 - [HRVOC trend data - will be made available soon.](#)