

Highly Reactive Volatile Organic Compound (HRVOC) Stakeholder Group Meeting

May 14, 2010
Air Quality Planning Section





Introduction

- HRVOC Emissions Cap and Trade (HECT) program allowance reallocation methodology timeline
- Preliminary HRVOC allocations updated 2/26/2010
- Form ECT-6H, HRVOC Baseline Emissions Certification Form training



Timeline

- **Adoption date:** March 10, 2010
- ***Texas Register* publication date:** March 26, 2010
- **Effective date:** April 1, 2010
- **ECT-6H due to the TCEQ:** July 1, 2010
- **Mail revision of allowances letters to companies:** October 2010



Estimated HECT Reallocation

- Link:
 - http://www.tceq.state.tx.us/assets/public/implementation/air/rules/hect/HECT_MASTER_REALLOCATER_3.xls
- Also review the HECT Reallocation Data & Assumptions pdf



Section I

I. COMPANY IDENTIFYING INFORMATION				
Company Name:				
Mailing Address:				
City:		State:		Zip Code:
TCEQ Customer Identification Number (CN):				
Site Name:				
Street Address (If no street address, give driving directions in writing):				
TCEQ Regulated Entity Number (RN):				
HECT Industry Sector:	<input type="checkbox"/> Chemical	<input type="checkbox"/> Polymer	<input type="checkbox"/> Refinery	<input type="checkbox"/> Other



Industry Sectors

- Industry sectors are assigned site wide only
- If selecting a different industry sector on ECT-6H than assigned on preliminary spreadsheet then provide supporting documentation and inform TCEQ staff



Section II

II. TECHNICAL CONTACT INFORMATION			
Contact Name: (<input type="checkbox"/> Mr. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)			
Organization:			
Contact Title:			
Mailing Address:			
City:		State:	Zip Code:
Telephone:	Fax Number:	E-mail:	



Section III

III. TWO-HIGH YEAR CERTIFICATION

The owner or operator shall certify in Table 1 of section IX of this form the two consecutive calendar-year control periods with the highest total average actual HRVOC emissions for each Path subject to the program selected from 2006 through 2009 to establish the baseline emissions period.



Section IV

IV. STREAM ALLOWANCE CERTIFICATION

Sites that qualify according to §101.394(a)(1)(C) may request from the executive director the use of any allowance stream acquired from facilities previously participating in the HECT program in lieu of reallocation until the alternate baseline emissions are established where the site has made HRVOC reductions.

Sites that qualify may request the application of an allowance stream toward their allocation under §101.394(a)(3)(E).



Section V

V. QUALIFYING STREAM TRADE(S)		
Original Owner:	Date Trade Submitted:	Amount of Stream (tons):
Original Owner:	Date Trade Submitted:	Amount of Stream (tons):



Section VI

VI. ALTERNATIVE BASELINE CERTIFICATION

No later than July 1, 2010, sites that qualify according to §101.394(a)(1)(D) may request from the executive director the use of an alternative baseline period of 2004 and 2005 for the purpose of establishing baseline emissions. To qualify for this provision, owners or operators of sites must be able to demonstrate to the executive director that they were performing continuous flow rate monitoring and speciation of HRVOC to determine HRVOC emissions during the requested alternative baseline period. In addition, the emission reductions must be permanent, voluntary, and quantifiable in an amount equal to or greater than 25 tons per year resulting in a site-wide reduction in HRVOC emissions of at least 25 percent, as calculated by comparing the average HRVOC emissions from the requested alternative baseline period to the baseline emissions period defined under §101.390. The emissions reductions must also have been made enforceable by a permit application submitted under Chapter 116 or other submittal to the executive director no later than April 1, 2010. Documentation making such demonstrations must accompany this form.

Check if the company is applying for an alternative baseline and has attached the required information.



Section VII

VII. FLARE AND VENT GAS RECOVERY CREDIT

No later than July 1, 2010, sites that are not requesting to use the alternative baseline provision according to §101.394(a)(1)(D) may request from the executive director credit for flare and vent gas recovery projects completed before the beginning of the emissions baseline period of January 1, 2006. Credit for flare and vent gas recovery projects will be applied as uncontrolled emissions toward the site's allocation. Credit is quantified as the difference between actual average HRVOC emissions during a 12-month period prior to implementation of the FGR project and a permit allowable HRVOC limit for the unit under a permit deemed technically complete before April 1, 2010. Documentation demonstrating that continuous flow rate monitoring and speciation of HRVOC was used to determine the average actual HRVOC emissions during a 12-month period prior to implementation of the FGR project, and that the permanent, voluntary, and quantifiable HRVOC emissions reductions due to the implementation of flare and/or vent gas recovery are enforceable, must accompany this form.

Check if the company is applying for the flare and vent gas recovery credit and has attached the required information.



Section VIII

VIII. CERTIFICATION

I, _____,
[Name/Title - Please print or type]

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief the information in this certification is not in any way in violation of 30 Texas Administrative Code §101.390 - 101.403 or any applicable air quality rule or regulation of the Texas Commission on Environmental Quality and that intentionally or knowingly making or causing to be made false material statements or representations in this certification is a CRIMINAL OFFENSE subject to criminal penalties.

DATE _____ SIGNATURE _____

Note : Original signature in ink is required and this form can not be certified by a consultant.



Items of Interest

- Facility type examples are: flare, cooling tower, vent, etc.
- Two year baseline emissions period is FIN/EPN path specific and does not have to be same for each FIN/EPN path.



Items of Interest

- Actual emissions in baseline emissions period are expected to reflect annual compliance forms previously submitted



Public Information Request

- ECT-6H applications will be posted online
- Supplemental information will not be posted online



Due Dates

**ECT-6H Forms are Due
July 1, 2010**

**Texas Commission on Environmental Quality
Emissions Banking and Trading Program**

MC 206

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Contact Information

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Discussion