



Texas Commission on Environmental Quality  
30 TAC Chapter 117, Subchapter D, Division 2

**DRAFT**  
Draft Guidance Document for  
Recordkeeping Requirements  
of §117.479(a)(2)(E)

Independent School Districts

(July 26, 2005)

This document provides guidance for independent school districts (ISDs) with boilers that are subject to TCEQ rules under Chapter 117, Subchapter D, Division 2. ISDs are required to keep records of fuel used by boilers in some cases. Recent revisions to Chapter 117 allow ISDs an alternative to comply with these recordkeeping requirements. This guidance outlines the alternative recordkeeping requirements and provides examples for complying with the rule. Exact methods are not specified in the rule to allow school districts the flexibility to choose the most appropriate estimation method for their specific situation. Any examples provided in this guidance document should not be interpreted as regulatory requirements. Other methods of estimating this information may be more appropriate. The actual rules referenced in this document can be found at: <http://www.tceq.state.tx.us/assets/public/legal/rules/rules/pdflib/117d.pdf>

### BACKGROUND

30 TAC Chapter 117, Subchapter D, Division 2 applies to boilers, process heaters, and stationary engines and gas turbines at minor sources of nitrogen oxides (NO<sub>x</sub>). The rule requires units at affected sites to meet emission specifications in §117.475. If a boiler can qualify for the exemption in §117.473(b), the unit is exempt from the emission specifications, testing, and most recordkeeping requirements. The exemption is based on fuel usage and is limited to 1.8 billion British thermal units (Btu) per year for units with a rated capacity greater than 2.0 and less than 5.0 million BTU (MMBtu)/hr and 9.0 billion Btu per year for units with a maximum rated capacity of 5.0 MMBtu/hr and greater. To demonstrate compliance with these fuel usage limitations, §117.479 requires installation of a totalizing fuel flow (TFF) meter; however, §117.479(a)(2)(E) allows ISDs to demonstrate compliance with this exemption through recordkeeping rather than installing a TFF meter. Please note, that for ISDs electing to use this alternative, the records required under §117.479(a)(2)(E) are in addition to the records of annual fuel usage for each unit in §117.479(g)(1).

### RULE OUTLINE

§117.471: Applicability

§117.473: Exemptions

§117.475: Emission Specifications

§117.478: Operating Requirements

§117.479: Monitoring, Recordkeeping and Reporting Requirements

### RECORDKEEPING REQUIREMENTS

In addition to the annual usage recordkeeping requirements set forth in §117.479(g)(1), the required monthly records for school districts using the alternative provision in §117.479(a)(2)(E) are as follows:

- total fuel usage for the entire site - §117.479(a)(2)(E)(i)(I)
- the estimated hours of operation for each unit - §117.479(a)(2)(E)(i)(II)
- the estimated average operating rate for each unit - §117.479(a)(2)(E)(i)(III)
- the estimated fuel usage for each unit - §117.479(a)(2)(E)(i)(IV)

Total Fuel Usage for the Entire Site

Monthly bills from the utility company are sufficient for these records.

The Estimated Hours of Operation for Each Unit

Operator logs, run time meters, process knowledge, or other estimation techniques may be used to estimate the number of hours the individual units are in operation for each month.

The Estimated Average Operating Rate for Each Unit

Manufacturer's data, temperature settings, damper positioning, or other operating settings may be used to estimate the load or percentage of maximum rated capacity. An example of this could include estimating operating rate based on maintaining the unit at a specific operating setting that represents a known percentage of the maximum rated capacity.

The Estimated Fuel Usage for Each Unit

The following are examples of estimation techniques:

- Multiplying the estimated operating rate and the estimated hours of operation is one way of estimating the fuel usage for an individual unit; or
- If multiple boilers exist at a site and all boilers are operated in a similar manner, it is acceptable to assume that the estimated fuel usage to be equivalent.

Requests for Information

The owner or operator has 60 days to respond if a written notice is received from the executive director requesting information regarding the recordkeeping alternative for ISD's. The response must be in writing and should include a detailed explanation of the estimation methods used, including but not limited to: any calculations, process information, assumed factors, manufacturer's information, and any other information used to estimate the data contained in the monthly records. Although not required by the rule, it is recommended that the owner or operator develop a written plan for maintaining the records specified in §117.479(a)(2)(E) and that this plan contain all relevant information regarding the estimation methods used for complying with the recordkeeping requirement.

OTHER ALTERNATIVES

Units may share a TFF meter or a utility meter for the entire site as long as 1) all units sharing the same meter qualify for the §117.473(b) exemption, and 2) the total fuel usage for the entire site must be less than 1.8 billion Btu/yr or, if all the units are greater than 5.0 MMBtu/hr, then the total fuel usage may not exceed 9.0 billion Btu/yr.