Greenhouse Gas Voluntary Updates

Project emission increases of greenhouse gases (GHGs) that do not meet the requirements in 30 Texas Administrative Code (TAC) § 116.164(a)(1) or (a)(2) do not require authorization, or any notification to TCEQ. However, GHG Prevention of Significant Deterioration permit holders have requested an opportunity to voluntarily authorize non-major increases of GHGs and changes to representations in their permits. TCEQ will make these changes to GHG permits at the request of the permit holder.

**GHG PSD Permit Holders – Options to Document Non-Major GHG Emissions**

1. Keep records to document project emission increases of GHGs do not meet the requirements of 30 TAC § 116.164(a)(1) or (a)(2);
2. Voluntarily certify GHG project emissions using the APD-CERT form on STEERs/e-Permitting; or
   - Emissions that are not required to be authorized will become enforceable.
   - TCEQ will not review GHG certifications.
3. Voluntarily update GHG PSD Maximum Allowable Emission Rate Table (MAERT) emission limits.
   - Emissions that are not required to be authorized will become enforceable.
   - Permit holders may request the GHG PSD MAERT be updated via letter, and must submit sufficient information to demonstrate expected emissions of GHGs.
   - TCEQ will confirm the represented calculations and compare GHG emission increases with appropriate major source thresholds.
   - One public notice comment period is required if the update involves a change to a Best Available Control Technology determination.
   - TCEQ will issue an updated permit face.
   - The permit holder will be required to conduct a minor revision of the Title V permit for the site.

**GHG PSD Permit Holders – Voluntarily Update Special Conditions**

If a permit holder requests to voluntarily update a special condition in an existing GHG PSD permit:

- Permit holders shall request the change via letter, and must submit sufficient information to justify the change to the special condition of the permit.
- Voluntary updates should be limited to Special Conditions within the scope of the associated project.
- TCEQ will evaluate the request to voluntarily update the special condition on a case-by-case basis and all changes will be made at the discretion of the TCEQ.
- One public notice comment period is required if the update involves a change to a Best Available Control Technology determination.
- TCEQ will issue an updated permit face, which will require the applicant to conduct a minor revision of the Title V permit for the site.
Owners or Operators Not Subject to GHG PSD – Options to Document Non-Major GHG Emissions

1. Keep records to document project emission increases of GHGS do not meet the requirements of 30 TAC § 116.164(a)(1) or (a)(2), or
2. Voluntarily certify GHG project emissions using the APD-CERT form on STEERs/e-Permitting.
   - Emissions that are not required to be authorized will become enforceable.
   - TCEQ will not review GHG certifications.