

## Mass Emissions Cap and Trade (MECT) Annual Compliance Reports Supporting Documentation Checklist for Major Sources

The following checklist was developed to help owners/operators of sites that are subject to the MECT Program to prepare and submit supporting documentation for Annual Compliance Reporting per [30 Texas Administrative Code \(TAC\) §101.359](#).

Annual Reports must be submitted through the [State of Texas Environmental Electronic Reporting System \(STEERS\)](#) by March 31<sup>st</sup> following each control period. Please attach a completed copy of this checklist, along with the appropriate supporting documentation, to your STEERS report submission. **Incomplete or missing documentation will delay processing of your report.**

This checklist is not a compliance substitute for the rule requirements in 30 TAC Chapter 117 and only reflects the documentation used by the Emission Banking and Trading Team to process annual compliance reports. The official version of the Chapter 117 rules is available on the [Secretary of State](#) website.

### Notes

- Emissions for each unit must be quantified using appropriate Chapter 117 monitoring and testing methods. If the required Chapter 117 data is missing or unavailable, you must provide an alternate method, in accordance with [30 TAC §101.354\(b\)](#) as well as a detailed description of the reason the alternate data is being used.
- Data substitution provided for CEMS or PEMS downtime in accordance with Chapter 117 procedures should not be listed as §101.354(b).
- If alternate data is used due to noncompliance with Chapter 117 protocols, an additional 10% quantification penalty will be applied in accordance with 30 TAC §101.354(b)(2) for the period of noncompliance.
- 30 TAC §117.340(c)(1) requires NO<sub>x</sub> CEMS or PEMS for:
  - Stationary gas turbines with a MW rating ≥ 30 MW operated ≥ 850 hours per year;
  - Units using a chemical reagent to reduce NO<sub>x</sub>;
  - Lime kilns and lightweight aggregate kilns;
  - Units with a rated heat input ≥ 100 MMBtu/hr; and
  - Fluid catalytic cracking units (including CO boilers, CO furnaces, and catalyst regenerator vents).

### Instructions

1. This document contains multiple checklist tables. Each checklist is associated to a Chapter 117 monitoring or testing citation. Complete the appropriate Level of Activity (LOA) and Emission Factor (EF) citation(s) checklists for the units at your site. **Only fill out the checklists for citations relevant to your report.**
2. In the first row of each applicable checklist, identify which unit(s), by Facility Identification Number (FIN) are reporting using that citation.
3. Use the checklist to identify the supporting documentation required with your Annual Compliance Report. Check off each item attached to your report.

## MECT Supporting Documentation Checklist for Major Sources

Complete the appropriate LOA citation(s) checklists:

- §117.340(a)(1)(B): Totalizing fuel flow meter for each unit not equipped with CEMS or PEMS:

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Annual fuel usage for each unit, in scf or gallons
<input type="checkbox"/>	If the unit was retested during the control period, provide the fuel usage values for before and after the test was conducted, since the new stack test value can only be used to calculate emissions from the date of the test forward
<input type="checkbox"/>	Type(s) of fuel burned
<input type="checkbox"/>	Higher (gross) heating value of the fuel(s) in Btu/scf (Btu/gallons, if liquid fuel) and the basis for the gross heating value (e.g., fuel test data, supplier data, AP-42, etc.)
<input type="checkbox"/>	For engines, heat rate in Btu/hp-hr (using data from the stack test, manufacturer's specification sheet, or other source)
<input type="checkbox"/>	For pulping liquor recovery furnaces, annual production rate if emission factors are reported in pound per air dried ton of pulp

- §117.340(a)(1)(B): Totalizing fuel flow meter for each unit with CEMS or PEMS:

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Annual heat input or production rate (for kilns or pulping liquor recovery furnaces) for each unit.

- §117.340(a)(2)(A): Stack exhaust flow monitoring for a unit with a CEMS:

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Stack exhaust flow for each unit (annual summaries are acceptable) <b>Note:</b> §117.340(c)(1)(H) requires stack exhaust flow monitoring for FCCUs *fluid catalytic cracking units, including carbon monoxide (CO) boiler, CO furnaces, and catalyst regenerator vents

- §117.340(a)(2)(B): Totalizing fuel flow meter for multiple units that vent to a common stack with a CEMS:

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Annual heat input or production rate (for kilns or pulping liquor recovery furnaces) for each unit

## MECT Supporting Documentation Checklist for Major Sources

- §117.340(a)(2)(C): Monthly fuel use records for each diesel engine operating with a run time meter:

FINs:	
Attached	Documentation Required
<input type="checkbox"/>	Annual diesel usage for each unit, in gallons
<input type="checkbox"/>	If the unit was retested during the control period, provide the diesel usage values for before and after the test was conducted, since the new stack test value can only be used to calculate emissions from the date of the test forward
<input type="checkbox"/>	Higher (gross) heating value of the diesel in Btu/gal and the basis for the gross heating value (e.g., fuel test data, supplier data, AP-42, etc.)
<input type="checkbox"/>	Heat rate in Btu/hp-hr (using data from the stack test, manufacturer's specification sheet, or other source)

- §117.340(a)(2)(D): Continuous monitoring of horsepower and hours of operation for each stationary reciprocating internal combustion engine or stationary gas turbine:

FINs:	
Attached	Documentation Required
<input type="checkbox"/>	Total hp-hr for the control period determined by summing the total hp-hr for each day (calculated by multiplying the average hp for that day times the total hours of operation for that day – electronic version preferred)
<input type="checkbox"/>	If the unit was retested during the control period, provide the hp-hr values for before and after the test was conducted, since the new stack test value can only be used to calculate emissions from the date of the test forward

- §101.354(b): Alternate Data

FINs:	
Attached	Documentation Required
<input type="checkbox"/>	Justification for not using the methods above, and the justification for the method used. <b>Note:</b> Emissions quantified under this protocol may be subject to a 10% quantification penalty

Continue to the next page for Emission Factor citations

## MECT Supporting Documentation Checklist for Major Sources

Complete the applicable EF Citation(s) checklists:

§117.340(c) and (f): NOX CEMS

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	<a href="#">Supporting Documentation for CEMS and PEMS</a>

§117.340(c) and (g): NOX PEMS

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	<a href="#">Supporting Documentation for CEMS and PEMS</a>

§117.340(o): Stack Test

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	NO <sub>x</sub> emission rate in units of the applicable emission limit (§117.8010(2)(A))
<input type="checkbox"/>	Copy (electronic version preferred) of the full stack test report if not sent with a report submitted for a previous control period (if summary pages were provided previously, the complete report must be provided)
<input type="checkbox"/>	If a unit was retested during the control period, also provide a copy (electronic version preferred) of the full stack test report for the re-test, since the new stack test value can only be used to calculate emissions from the date of the new test forward.
<input type="checkbox"/>	If a unit was retested during the control period, a weighted emission factor calculated from the previous emissions test and new test must be entered for the unit in STEERS. Provide calculations for the weighted average emission factor.

## MECT Supporting Documentation Checklist for Major Sources

**§117.8000(e): Relocated boiler or process heater (less than 60 consecutive calendar days)**

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Copy (electronic version preferred) of the full stack test report if not sent with a report submitted for a previous control period (if summary pages were provided previously, the complete report must be provided) <b>or</b> manufacturer's guarantee of performance.
<input type="checkbox"/>	Dates (mm/dd/yyyy) that the unit(s) were installed and physically removed from the account.

**§101.354(b): Alternate Data**

<b>FINs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Justification for not using the methods above, and the justification for the method used. <b>Note:</b> Emissions quantified under this protocol may be subject to a 10% quantification penalty