

Highly Reactive Volatile Organic Compound Emissions Cap and Trade (HECT) Annual Compliance Reports

Supporting Documentation Checklist for Cooling Towers

The following checklist was developed to help owners/operators of sites that are subject to the HECT Program to prepare and submit supporting documentation for Annual Compliance Reporting per [30 Texas Administrative Code \(TAC\) §101.400](#).

Annual Reports must be submitted through the [State of Texas Environmental Electronic Reporting System \(STEERS\)](#) by March 31st 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 115 and only reflects the documentation used by the Emission Banking and Trading Team to process annual compliance reports. The official version of the Chapter 115 rules is available on the [Secretary of State](#) website.

Notes

- Emissions for each HECT facility must be quantified using appropriate Chapter 115 monitoring and testing methods. If the required Chapter 115 data is missing or unavailable, you must provide an alternate method, in accordance with [30 TAC §101.396\(c\)](#) as well as a detailed description of the reason the alternate data is being used.
- Data substitution provided for continuous monitoring systems (CMS) downtime should be listed in accordance with Chapter 115 procedures and should not be listed as §101.396(c).
- If alternate data is used due to noncompliance with Chapter 115 protocols, a 10% quantification penalty will be applied in accordance with §101.396(c)(2) for the period of noncompliance.

Instructions

1. This document contains multiple checklist tables. Each checklist is associated with a Chapter 115 monitoring or testing citation.
2. Complete the appropriate checklists for the units at your site. **Only fill out the checklists for citations relevant to your report.**
3. In the first row of each applicable checklist, identify which unit(s), by Emission Point Number (EPN) are reporting using that citation.
4. Use the checklist to identify the supporting documentation required with your Annual Compliance Report. Check off each item attached to your report.

HECT Supporting Documentation Checklist for Cooling Towers

Complete at least **two** citation checklists for the cooling towers at your site. Include which EPNs are reporting in the first row of each applicable checklist table.

- §115.764(a)(1): Cooling tower with a design capacity to circulate \geq 8,000 gallons per minute (gpm) cooling water:**

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (ton per year, tpy) for each cooling tower (isomers of butene may be reported collectively)
<input type="checkbox"/>	Design capacity circulation rate (gpm) for each cooling tower
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	HECT CMS Certification form

- §115.764(a)(2), (4), (5): Cooling tower with a design capacity to circulate \geq 8,000 gpm cooling water:**

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	HECT CMS Certification form
<input type="checkbox"/>	HECT Accredited Laboratory Certification form for laboratory analyses of samples

- §115.764(a)(6): Cooling tower with a design capacity to circulate \geq 8,000 gpm cooling water:**

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	HECT CMS Certification form

- §115.764(b)(1): Cooling tower with a design capacity to circulate <8,000 gpm cooling water or in dedicated service to a jacketed reactor:

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Design capacity circulation rate (gpm) for each cooling tower
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	HECT CMS Certification form

- §115.764(b)(2), (4), (5): Cooling tower with a design capacity to circulate <8,000 gpm cooling water or in dedicated service to a jacketed reactor:

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	HECT Accredited Laboratory Certification form for laboratory analyses of samples

- §115.764(b)(6): Cooling tower with a design capacity to circulate <8,000 gpm cooling water or in dedicated service to a jacketed reactor:

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	HECT CMS Certification form
<input type="checkbox"/>	HECT Accredited Laboratory Certification form for laboratory analyses of samples

- §115.764(d): Cooling towers with heat exchangers that produce less than 5.0% HRVOC in process-side fluid – monthly testing for HRVOC concentration in accordance with [Appendix P – Modified El Paso Method](#)

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (ton per year, tpy) for each cooling tower (isomers of butene may be reported collectively)
<input type="checkbox"/>	Brief description of the specific procedures followed to satisfy 30 TAC §115.764(d) and TCEQ Sampling Procedures Manual Appendix P monitoring requirements, including: <ul style="list-style-type: none"> • Number and date of samples, • Appendix P VOC air stripping conditions, analyzer(s) used, and dates calibrated, and sample results, and • If a gas chromatograph (GC) was used, include a list of the analyzer's Calibration and Performance Standards that were followed.

- §115.764(e)(1): Cooling tower not using an option in §115.764(a)(1), (b)(1), or (e)(2):

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Design capacity circulation rate (gpm) for each cooling tower
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	Certified pump performance information from manufacturer or a qualified independent third-party organization showing maximum potential flow rate

- §115.764(e)(2): Cooling tower not using an option in §115.764(a)(1), (b)(1), or (e)(2):

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Design capacity circulation rate (gpm) for each cooling tower
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN, including description of the methodology used to determine cooling water flow rate
<input type="checkbox"/>	Certified pump performance information from manufacturer or a qualified independent third-party organization showing maximum potential flow rate

§115.764(f): Alternative monitoring approved by the executive director

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Design capacity circulation rate (gpm) for each cooling tower
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	Summary of the alternative monitoring procedure
<input type="checkbox"/>	Documentation of Texas Commission on Environmental Quality (TCEQ) approval of alternate monitoring or testing procedure

§115.764(h)(1): Cooling tower with a design capacity to circulate ≥ 8,000 gpm cooling water and in dedicated service to finite volume system (e.g., propylene refrigeration system):

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Design capacity circulation rate (gpm) for each cooling tower
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	HECT CMS Certification form

§115.764(h)(2)-(7): Cooling tower with a design capacity to circulate ≥ 8,000 gpm cooling water and in dedicated service to finite volume system (e.g., propylene refrigeration system)

List all applicable EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	HECT Accredited Laboratory Certification form for laboratory analyses of samples

§101.396(c): Alternate Data

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