

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

Supporting Documentation Checklist for Vents

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, an additional 10% quantification penalty will be applied in accordance with §101.396(c)(2) for the period of noncompliance.
- HRVOC emissions from pressure relief valves (PRVs) are only included for time periods that the PRV is open. HRVOC emissions resulting from the PRV leaking while closed are classified as fugitive emissions subject to Chapter 115, Subchapter H, Division 3, and are excluded from §115.725 and HECT.

Instructions

1. This document contains multiple checklist tables. Each checklist is associated to a Chapter 115 monitoring or testing citation. Complete the appropriate 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 Emission Point Number (EPN) 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.

HECT Supporting Documentation Checklist for Vents

Complete the appropriate checklists:

- §115.725(a): Vent gas streams not controlled by a flare, other than PRVs except those using an applicable option in §115.725(b)(1),(b)(2), or (m):

EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (ton per year, tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN (including a description of the operational parameters that are continuously monitored)
<input type="checkbox"/>	Stack test report summary (not full report) used to establish maximum potential HRVOC emission rate for the vent
<input type="checkbox"/>	Approved testing waiver for up to half of any group of vents that are identical in design and operation and that are expected to have identical emissions, if applicable
<input type="checkbox"/>	HECT Accredited laboratory Certification form for laboratory analyses of testing samples occurring after July 1, 2008

- §115.725(b)(1): Vent gas streams that are not controlled by a flare, other than PRVs, monitored with a continuous emissions monitoring system (CEMS):

EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	Brief written description of the calculation methodology should include a statement of which method was used to determine flow rate: <ul style="list-style-type: none"> • Continuous monitoring of volumetric flow rate, or • Continuous parameter monitoring and the use of engineering calculations, manufacturer's data, or testing to correlate the monitored parameter and the volumetric flow rate
<input type="checkbox"/>	HECT CMS Certification form for HRVOC concentration

HECT Supporting Documentation Checklist for Vents

- §115.725(b)(2): Analyzer vents, steam system vents, vent gas streams where there is no HRVOC present except during emissions events, or degassing safety devices:**

EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN

- §115.725(c): PRVs not controlled by a flare:**

EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<input type="checkbox"/>	Brief written description of the methodology used to determine the reported HRVOC emissions for each EPN
<input type="checkbox"/>	Brief written description of the calculation methodology should include a statement of which method was used to determine flow rate: <ul style="list-style-type: none"> • Continuous monitoring of volumetric flow rate, or • Continuous parameter monitoring and the use of engineering calculations, manufacturer's data, or testing to correlate the monitored parameter and the volumetric flow rate
<input type="checkbox"/>	HECT CMS Certification form for HRVOC concentration

- §115.725(m): Alternative monitoring or testing methods approved by the executive director for a vent gas stream not controlled by a flare:**

EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each vent (isomers of butene may be reported collectively)
<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 or testing procedure
<input type="checkbox"/>	Copy of Texas Commission on Environmental Quality (TCEQ) approval of alternative monitoring or testing procedure

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§101.396(c): Alternate Data

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