

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

## Supporting Documentation Checklist for Flares

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 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 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.

### 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 Flares

Complete the appropriate checklists:

- §115.725(a)-(c): Flare that receives only gas streams containing <5.0% HRVOC by weight (§115.727(b)(1))

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	See requirements for vents (found in the HECT Supporting Documentation Checklist for Vents)

- §115.725(d): All flares except those using an applicable option in §115.725(e)-(k):

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (ton per year, tpy) for each flare (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 flare
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> for flow monitoring and concentration monitoring of HRVOCs and other constituents
<input type="checkbox"/>	<a href="#">HECT Accredited Laboratory Certification form</a> for laboratory analyses of samples during monitor downtime (Method 18 for HRVOC)
<input type="checkbox"/>	Copy of Texas Commission on Environmental Quality (TCEQ) Approval of alternative flow determination method, if applicable

- §115.725(e): Flares used solely for marine or transport vessel loading or unloading operations:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> for online calorimeter monitoring

## HECT Supporting Documentation Checklist for Flares

- §115.725(f): Flares used solely for scheduled or unscheduled MSS activities operated in HRVOC service ≤ 720 hours for an individual flare and ≤ 1,440 hours for multiple flares at the site in 12 consecutive months:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare, including statement that indicates if flow rate and HRVOC concentration are determined through monitoring/measurement or process knowledge/engineering calculations
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> for online calorimeter monitoring and flow monitoring, if using a continuous flow rate monitoring system

- §115.725(g): Emergency Flares:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> for physical seal or flow indicator monitoring and other monitoring, if using actual measurement to determine HRVOC sent to the flare

- §115.725(h): Flares that temporarily receive HRVOC emissions during operations other than MSS or emergency operated in HRVOC service ≤ 336 hours for an individual flare and ≤ 672 hours for multiple flares at the site in 12 consecutive months:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare, including a description of how the flow rate and HRVOC concentration are determined
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> for continuous flow monitoring or HRVOC concentration monitoring, if either of those options are used to determine flow rate or HRVOC concentration
<input type="checkbox"/>	<a href="#">HECT Accredited Laboratory Certification form</a> for laboratory analyses of periodic sampling, if that option is use to determine HRVOC concentration

## HECT Supporting Documentation Checklist for Flares

§115.725(i): Flares used for liquid or dual phase streams:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare

§115.725(j): Flares used in metal alkyl production processes:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> for continuous flow monitoring or HRVOC concentration monitoring, if either of those options are used to determine flow rate or HRVOC concentration
<input type="checkbox"/>	Copy of TCEQ approval of alternative flow monitoring, if continuous flow rate monitoring system is not used

§115.725(k): Flares used in multi-purpose service for loading, MSS, or emergency operations:

<b>EPNs:</b>	
<b>Attached</b>	<b>Documentation Required</b>
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare, including a statement of which method was used to determine flow rate and HRVOC sent to the flare
<input type="checkbox"/>	<a href="#">HECT CMS certification form</a> if using any of the following options: physical seal or flow indicator monitoring, continuous flow rate monitoring system, and/or continuous monitoring of HRVOC concentration

## HECT Supporting Documentation Checklist for Flares

§115.725(m): Alternative monitoring or testing methods approved by the executive director:

EPNs:	
Attached	Documentation Required
<input type="checkbox"/>	Speciated HRVOC emissions (tpy) for each flare (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 flare
<input type="checkbox"/>	Summary of the alternative monitoring or testing procedure
<input type="checkbox"/>	Documentation of TCEQ approval of alternate monitoring or testing procedure (Note: there are pre-approved alternatives in §117.725(m)(1)-(3) for net heating value monitoring)

§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. <b>Note:</b> Emissions quantified under this protocol are subject to a 10% quantification penalty