

# Emission Reduction Credit (ERC) Generation General Workbook Tip Sheet

## Version 1.0

### Introduction

- Complete the ERC Generation General Workbook for point and area source ERC Generation applications.
- The workbook should be submitted via State of Texas Environmental Electronic Reporting System ([STEERS](#)) as an attachment to the ERC Generation STEERS application. All required supporting documentation and calculations should also be submitted via STEERS.
  - Instructions for completing Emissions Banking and Trading (EBT) STEERS applications are available on the EBT webpage at <https://www.tceq.texas.gov/airquality/banking>.
  - A hard copy of the workbook is not required; however, it is recommended that you save a copy of the completed electronic copy workbook for your records.
- If the supporting documentation exceeds the 20 megabytes (MB) size limit for attachments in STEERS, you may submit additional files by one of the following options:
  - Email documents to [ebt@tceq.texas.gov](mailto:ebt@tceq.texas.gov). This email should be sent to the EBT immediately after the ERC Generation STEERS application is submitted. The email subject line should be in the following format: "<Project Number> - <Company and Site Name> - ERC Generation Supporting Documentation".
  - Submit files via the Texas Commission on Environmental Quality (TCEQ) [file transfer protocol secure \(FTPS\) site](#).
- **Do not submit confidential information.** Supporting documents for ERC generation cannot be confidential per [30 Texas Administrative Code \(TAC\) §101.302\(j\)](#).
- ERC Generation applications submitted without the required supporting documentation may not be accepted.

### Cover

- Please read the directions included on the Cover Worksheet before beginning to complete the workbook.
- The workbook allows up to 50 facilities (i.e., facility identification numbers (FIN)). If your project contains more than 50 FINs, complete and submit a second workbook.
- The worksheets must be completed in sequence from top to bottom and left to right for the workbook features to function correctly. Please do not complete the workbook pages out of order or skip cells that require an entry or drop-down selection. Completing the workbook out of order or skipping required yellow data entry cells will cause the workbook to not function properly.
- All yellow data entry cells in the workbook should be completed before submittal. The yellow data entry cells also contain input messages that can be read by a screen reader indicating that they are yellow.
- Please leave grayed out data entry cells empty. If prior responses are revised and a section grays out based on the updated responses, delete the responses in the data entry cells that are now grayed out prior to moving forward in the workbook.
- A cell turning red indicates a potential problem with your application which may result in your application not being accepted. Your workbook should not contain any red cells upon submission (with some exception under the Emissions Supporting Documents tab).
- You may need to scroll down to see the questions.
- The VOC Speciation and Representative Site Analysis Worksheets will become available (ungrayed) based on prior worksheet responses. Row one of these worksheets will state when each worksheet is required.
- Each worksheet contains an Applicant Internal Comments column on the right-hand side. This column is to assist with the completion of the workbook. Please delete any comments added in this column before the workbook is submitted.

- If you encounter any issues, please send a copy of your workbook to the EBT team to facilitate troubleshooting.
- To navigate to the next worksheet, you may click the link at the bottom of the current worksheet or click the desired worksheet tab along the bottom ribbon.
- **Questions?** Contact the EBT team at [ebt@tceq.texas.gov](mailto:ebt@tceq.texas.gov)

## General

- In Section I. Applicant Information:
  - The Company or Legal Name, Customer Number (CN), and Regulated Entity Number (RN) should be consistent with what is listed in TCEQ's Central Registry.
  - Select the correct county where the site is located. Depending on the county chosen, applicable cells below will become ungrayed in Section II.A. Project Type. i.e., Cells A24 - A25 and B24 - B25 will become ungrayed for counties that are only partially nonattainment while Cells A28 and B28 will become ungrayed for all other nonattainment counties.
- In Section II. ERC Generation Project Information:
  - Under Section II. A. Project Type, select a response (Yes or No) to the question "Is this site an electric generating facility (EGF) that reported to the Environmental Protection Agency (EPA) Acid Rain Program during the SIP Year?"
  - If your response is "No" additional cells will become ungrayed. Select response to the questions regarding if the site reported to the Emissions Inventory during the SIP Year and if the site emitted more than 10 tons per year (tpy) of volatile organic compounds (VOC) or 25 tpy of nitrogen oxides (NO<sub>x</sub>) during the SIP year.
  - Depending on your responses, the workbook will determine if your site is an EGF, Point, Area, or Non-Reporting Point Source. If the site is determined to be a Non-Reporting Point Source, do not continue filling out the workbook.
  - Under Section II.B. Reduction Strategy, select the reduction strategy(s).
    - If "Other Method that is approved by the Executive Director" is selected, the workbook will prompt you to add a description. Prior to submission of the ERC Generation application and workbook, you must receive approval from the TCEQ Executive Director for the strategy. To request approval, send the description of your strategy via email to [ebt@tceq.texas.gov](mailto:ebt@tceq.texas.gov).
  - If there is an additional reduction strategy, rows 40 – 42 will become ungrayed so you may provide the second strategy.
- In Section III. Supporting Application Materials:
  - Ensure all listed supporting documentation is submitted with the ERC Generation application.

## Facility Information

- In Section I. Site Information:
  - If you indicated on the General Worksheet that there are FINs at your site subject to the Mass Emissions Cap and Trade (MECT) or Highly Reactive Volatile Organic Compound Emissions Cap and Trade (HECT) programs, select the appropriate Cap and Trade Program(s) the site is subject to. If there are no FINs in these programs, the cells will remain grayed out.
  - If the reduction strategy is a full permanent shutdown of an oil & gas production site, enter the correct dates for final production reported to the Texas Railroad Commission and the well plugging. If the well(s) have not been plugged, enter the anticipated plugging date. This will help determine the reduction date for each facility and the date the ERC application is due. If the reduction strategy is not a full permanent shutdown of an oil & gas production site, these cells will remain grayed out.

- Oil and gas production sites that have been fully shut down and have plugged all affected wells within one year of final production reported to the Texas Railroad Commission may use the well plugging date as the reduction date for all facilities and certified ERCs will be available for 72 months from the well plugging date. EBT staff will confirm eligibility for this incentive upon receipt of the ERC generation application and workbook.
- In Section II. Facility Information:
  - Be sure to include ALL FINs that are requesting to generate ERCs on the table. These FINs and the equipment type should match the FINs included in the ERC Generation STEERS application. This selection will influence the type of supporting documentation that is required for each facility and must be correct.
  - The VOC, NO<sub>x</sub>, particulate matter 10 microns (PM10), sulfur dioxide (SO<sub>2</sub>) columns become ungrayed based on the county selected under the General tab and if the pollutant type is in nonattainment for that county. Select the correct pollutants for each FIN as this influences the availability of additional information in the workbook.
  - The MECT column of the Facility Information table will become ungrayed if the site is subject to the MECT Program and the HECT column of this table will become ungrayed if the site is subject to the HECT Program. Select yes or no to indicate if the individual FIN is subject to the applicable program.
  - Select the appropriate reduction strategy for each FIN. The reduction strategy list will be limited to what was selected on the General Worksheet. If there are more than two reductions strategies, please complete and submit a second workbook.
  - If the site does not qualify for the 72-month Oil & Gas incentive in Section I, provide appropriate dates to the questions in the Reduction Date section of the table. A Reduction Date will be calculated based on the responses to these questions. Indicate whether or not you agree with this date. If not, provide the date you believe is correct and provide a justification for the date you provided.
  - The last date to submit the application for a particular FIN and reduction strategy will be generated. A message will appear if it is determined that the submission deadline has passed.

### **Emission Supporting Documents**

- Each FIN and EPN combination listed on the drop-down should have an entry for each applicable pollutant type.
- Based on previous selections, this worksheet will auto-populate with the required supporting documentation to be submitted to support the emissions calculation for each FIN for each pollutant type.
- Ensure that a yes or no response has been selected for all the documentation required for all FINs listed in the worksheet. Between one and nine items may be requested as supporting documentation, depending on pollutant and equipment type. When there are no more questions regarding documentation for a FIN, the last cell will state “There are no more questions for this facility.” and the rest of the row will gray out indicating that no further information is necessary.
  - If the response is No, indicating that the requested supporting documentation is not included in the application, please provide a justification in the designated cell in column V explaining why the required document is not applicable to the project.
- Ensure that all requested supporting documentation is submitted through STEERS, email, or FTPS, as appropriate.

### **Permitting**

- Each FIN and EPN combination listed on the drop-down should have an entry in Section I, Authorization Type by Facility Table. As such, there will be two entries for each FIN and EPN combination with two pollutant types.
- The SIP year will auto-populate based on the selections on the General Worksheet.

- Enter the Historical Years for the FIN and EPN combination. The historical years must be consecutive, per [§101.303\(b\)](#) and must match the years entered to the STEERS ERC Generation application.
- Select the type of authorization for each FIN and EPN combination and enter the authorization or registration number. If the Type of Authorization selected is Non-Registered Permit by Rule (PBR), then the Authorization or Registration Number column will gray out and the Non-Registered PBR Citation column will become ungrayed.
- Enter the four-digit year of the permit issuance or year the non-registered PBR was first claimed.
- Select yes or no to indicate if the reduction has been made enforceable in accordance with [§101.303\(d\)\(4\)](#).
- Enter the permit project number or the planned date of reduction enforcement.

## Regulations

- Add all the appropriate Rule Chapters, Subsections, and Citations that are applicable for each FIN and EPN combination.
- For each regulation, add an explanation as to how the FIN either complies with, or is exempt from, the rule.
- For additional citations that may be applicable to your site and facilities, see the TCEQ Air Permits website: <https://www.tceq.texas.gov/permitting/air/guidance/newsourcereview>.
- Two example regulation entries are provided on this worksheet for your reference.

## VOC Speciation

- The VOC Speciation Worksheets will become available (ungrayed) if you indicate that you are applying for VOC ERCs on the Facility Information Worksheet. If you are not applying for VOC ERCs, this worksheet will appear grayed out. This worksheet is required if the applicant states that they are applying for VOC ERCs.
- Each FIN and EPN combination requesting VOC ERCs should be listed on this worksheet and should match the FINs requesting VOC ERCs in the ERC Generation STEERS application. Each FIN and EPN combination, along with the equipment types, requesting VOC ERCs will auto-populate in the VOC Speciation Table.
- Select the VOC speciation source for each facility from the drop-down list. The drop-down list for each facility type includes the types of VOC speciation source that is considered appropriate for that facility type.
- Include a description of the VOC Speciation Source if “Other” is selected, as well as a justification for using alternate data.
  - The documentation to support the VOC speciation list that is considered appropriate for that facility type and speciation source will auto-populate. Ensure that all requested supporting documentation is included with the ERC Generation application.

## Representative Site Analysis

- This worksheet becomes available (ungrayed) if you are applying for VOC ERCs and select that at least one FIN is using a Representative Site Analysis on the VOC Speciation Worksheet.
- All facilities requesting VOC ERCs that are using a representative site analysis as their VOC speciation source should be listed on this worksheet. Make sure all applicable FIN and EPN combinations auto-populate in the Representative Site Analysis Table.
- A yes or no answer to all three questions must be provided for each facility.
- Include a justification for using a representative site analysis for the FIN rather than a site-specific analysis.
  - The documentation to support the use of a representative site analysis that is considered appropriate will auto-populate. Ensure that all requested supporting documentation is included with the ERC Generation application.

- This is the final worksheet that requires input. The workbook should now be complete. Please review all worksheets to ensure all required cells contain appropriate responses and that all requested supporting documentation will be submitted with the project through STEERS, email, or FTPS, as appropriate.

#### **Resource Worksheets**

- Glossary: Terms used within the workbook.
- Acronym: List of acronyms used within the workbook.