

AIR DERC_102004892-409217_
USE_20140502_Use_D3102

05/02/2014 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 409217 STATUS: P DISP CODE: c ✓
RECEIVED: 04/01/2014 PROJTYPE: BUSE ISSUED DT: 5/2/2014
SUP-DISP DATE:

STAFF ASSIGNED TO PROJECT:
THOMAS, JOSEPH

PROJECT NOTES:
USE PERIOD 1/1/2013 - 12/31/2013. INTENT PROJECT 407398.

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: MILLER TRANSPORTERS INC
CUSTOMER REGISTRY ID: CN600369508

PORTFOLIO DATA

NUMBER: P3007 NAME: MILLER TRANSPORTERS - RN102004892

SITE DATA

ACCOUNT: HG1266P
REG ENTITY ID: RN102004892
SITE NAME: MILLER TRANSPORTERS
COUNTY: HARRIS NEAREST CITY: CHANNELVIEW
LOCATION: 15855 WOOD AVE, CHANNELVIEW, TX

CONTACT DATA

NAME: ED MATLAGE TITLE: DIRECTOR OF ENVIRONMENTAL AFFAIRS
STREET: PO BOX 1123 CITY/STATE, ZIP: JACKSON, MS , 39205-1123
PHONE: 800-645-5378 ext 0
Email: ematlage@millert.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2014-05-01 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX TONS: 0.30 DOLLARS: 0
ALLOWANCE CERTIFICATE NO.: D3102 COUNTY: HARRIS

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE
DATE ENTERED: 2014-05-01 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX TONS: 0.20 DOLLARS: 0
ALLOWANCE0 CERTIFICATE NO.: D3101 COUNTY: HARRIS

TRACKING ACTIVITES

PM RECEIVED DATE : 05/02/2014 LETTER ISSUED :

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

Project No.:	409217	Customer Reference No.:	CN600369508
Project Type:	BUSE	Regulated Entity Reference No.:	RN102004892
Company:	Miller Transporters, Inc.	Facility Name:	Miller Transporters
City:	Channelview	County:	Harris
Project Manager:	Mr. Joseph Thomas	Portfolio Name:	P3007

Project Overview

Miller Transporters, Inc., submitted a Notice of Use Discrete Emission Credits (Form DEC-3) on April 1, 2014 for compliance with 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A). The company set aside in Project 407398 a total of 0.5 ton (including the 10% environmental contribution of 0.1 ton) of nitrogen oxides (NO_x) Discrete Emission Reduction Credits (DERCs) from Certificate D-2834 for potential excess emissions during the period of January 1, 2013 through December 31, 2013. The 0.1 ton of excess emissions reported on the Form DEC-3 was from two boilers, Facility Identification Numbers (FIN) BLR-1 and 95-1. Because only 0.2 ton (including the 10% environmental contribution of 0.1 ton) of DERCs were used, the retained amount of 0.3 ton is being returned to the company as certificate D-3102. Certificate D-2834 has been cancelled.

Discrete Emission Credit Use

Miller Transporters, Inc., has two boilers at the Miller Transporters terminal, which are subject to and exceeded the emission rate limits in 30 TAC §117.2010(c)(1)(A).

Certificates used.....D-2834 (intent), D-3101 (use)
 Pollutant.....NO_x
 Amount..... 0.2 ton
 Regulation..... §117.2010(c)(1)(A)
 Use period/Use Date.....1/1/2013 through 12/31/2013

Credit Use Calculation Methods

FINs BLR-1 and 95-1 have emission rates of 0.043 lb/MMBtu and 0.072 lb/MMBtu, respectively, which exceed the ESAD of 0.036 lb/MMBtu for the boilers. The level of activity for the use period was 10,407.2 MMBtu for FIN BLR-1 and 407.3 MMBtu for FIN 95-1, as determined from fuel usage. The actual emission rate for each boiler was determined by stack testing.

Per §101.376(e)(2)(A),
 DERCs needed per unit = (AER - RER) x (ALA)

Where:

- ALA = actual level of activity
- AER = actual emission rate per unit activity
- RER = regulatory emission rate per unit activity

FIN BLR-1

$$\text{DERCs needed} = [(0.043 \text{ lb/MMBtu} - 0.036 \text{ lb/MMBtu}) \times (10,407.2 \text{ MMBtu})] / (2000 \text{ lb/ton})$$

$$= 0.036 \text{ ton}$$

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

Page 2

Project No. 409217

Credit Use Calculation Methods cont.

FIN 95-1

$$\text{DERCs needed} = [(0.072 \text{ lb/MMBtu} - 0.036 \text{ lb/MMBtu}) \times (407.3 \text{ MMBtu})] / (2000 \text{ lb/ton})$$
$$= 0.008 \text{ ton}$$

Total

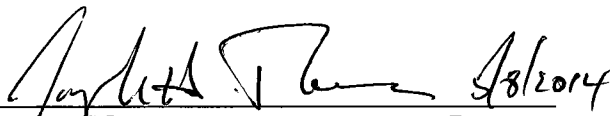
0.036 ton + 0.008 ton = 0.044 ton; rounded up to the nearest tenth = 0.1 ton


10% environmental contribution = 0.01 ton; rounded up to the nearest tenth = 0.1 ton

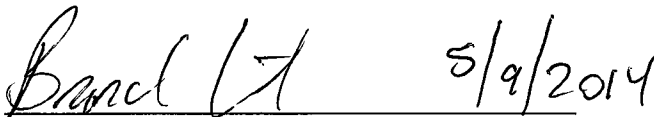
Total DERCs needed = 0.1 ton + 0.1 ton = 0.2 ton

Conclusion

Miller Transporters, Inc., used 0.2 ton of DERCs (including the 10% environmental contribution of 0.1 ton) to comply with the ESAD in 30 TAC §117.2010(c)(1)(A) during the use period of January 1, 2013 through December 31, 2013 for the two boilers at the Miller Transporters terminal. The remaining 0.3 ton of DERCs from certificate D-2834 has been retained as Certificate D-3102.


Project Manager Date


Peer Reviewer Date


Work Lead Date

INTENT PROJECT	INTENT RECEIVED	INTENT CERTIFICATE	POLLUTANT	INTENT AMOUNT	TOTAL AMOUNT	PERIOD START DATE	PERIOD END DATE	INTENT FLAG	USE PROJECT	USE RECEIVED	USE AMOUNT	USE CERTIFICATE
407398	11/12/2012	D2834	NOX	0.5	0.9	1/1/2013	12/31/2013	YES	409217	4/1/2014	0.2	03101

retained 0.3 (03102)





Form DEC-3 (Page 1)
Notice of Use of Discrete Emission Credits
 (Title 30 Texas Administrative Code § 101.370 - § 101.379)

Received

ST

APR - 1 2014

409217

Air Quality Division

I. COMPANY IDENTIFYING INFORMATION			
A. Company Name: Miller Transporters, Inc. ✓			
Mailing Address: P.O. Box 1123			
City: Jackson	State: Mississippi	Zip Code: 39205-1123	
Telephone: (800) 645-5378		Fax: (601) 923-2595	
B. TCEQ Customer Number (CN): CN600369508 ✓			
C. Site Name: Miller Transporters (Channelview)			
Street Address (If no street address, give driving directions to site) 15855 Wood Drive			
Nearest City: Channelview	Zip Code: 77530	County: Harris	
D. TCEQ Regulated Entity Number (RN): RN102004892 ✓			
E. TCEQ Air Account Number: (if applicable) HG-1266-P ✓			
F. Primary SIC: 4231 (NAICS 788999)		Air Permit Number: 19802	
II. TECHNICAL CONTACT IDENTIFYING INFORMATION			
A. Company Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : Philip Evans			
Technical Contact Title: Vice President, Technical Services			
Mailing Address: 110 Bender Ave.			
City: Humble	State: Texas	Zip Code: 77338	
Telephone: 281-446-7070	Fax: 281-446-3348	E-mail: pevans@wcmgroup.com	
III. COMPANY CONTACT IDENTIFYING INFORMATION			
A. Company Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : Ed Matlage			
Company Contact Title: : Director of Environmental Affairs			
Mailing Address: : P.O. Box 1123			
City: Jackson	State: Mississippi	Zip Code: 39205-1123	
Telephone: (800) 645-5378	Fax: (601) 923-2595	E-mail: ematlage@millert.com	
IV. Mass Emission Cap and Trade Program (MECT)			
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Year DERC Generated: _____ Year of use: _____ Ratio of DERC to Allowance: _____ to _____			
<i>Note: If DERC use is to comply with MECT then go to Section X</i>			
V. Use Period			
Use Start Date: <u>01/01/2013</u>		Use End Date: <u>12/31/2013</u>	
VI. State and Federal Requirements			
Applicable State and Federal requirements that the DERCs will be used for compliance:			



Form DEC-3 (Page 2)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

VII. Most Stringent Emission Rate
Describe basis for most stringent allowable emission rate: <input type="checkbox"/> Permit : _____ <input checked="" type="checkbox"/> RACT : <u>0.036 lb/MMBtu</u> <input type="checkbox"/> Other: _____ <i>Notes:</i>
VIII. PROTOCOL
Protocol used to calculate DERC: <i>Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form</i>

Continue to Section VII (next page)



Form DEC-3 (Page 3)
Notice of Use of Discrete Emission Credits
 (Title 30 Texas Administrative Code § 101.370 - § 101.379)

IX. Tons of DERCs Used									
Emission Point No.	FIN	Air Contaminant	Calculation of DERCs						
			Actual Activity (units)	Actual Emissions Rate (units)	Actual Total Emissions (tons)	Regulated Activity (units)	Regulated Emissions Rate (units)	Regulated Total Emissions (tons)	DERCs Used (tons)
BLR-1	BLR-1	NOx	10,407.2 MMBtu/yr	0.043 lb/MMBtu	0.224	10,407.2 MMBtu/yr	0.036 lb/MMBtu	0.187	0.036
95-1	95-1	NOx	407.3 MMBtu/yr	0.072 lb/MMBtu	0.015	407.3 MMBtu/yr	0.036 lb/MMBtu	0.007	0.008
									Total:
									0.044



Form DEC-3 (Page 4)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

X. TOTAL DERCS REQUIRED FOR USE (round up to the nearest tenth of a ton)


Tons of DERCS required (from Sect. VI.)	CO: _____	NO _x : <u>0.1</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : <u>0.01</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS Used	CO: _____	NO _x : <u>0.11 or 0.2</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

XI. DERC INFORMATION

Name of the DERC Generator: NA
 DERC Generator Regulated Entity Number: NA
 Certificate number of the DERCS acquired or to be acquired: D-2834 Currently held by Miller Transporters, Inc.
Note: The certificate number is assigned by the TCEQ

XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

I, Ed Matlage, hereby certify, to the best of my knowledge and belief, that this application is correct and the use strategy claimed on this notice has met the requirements of all applicable state and federal rules and regulations. I further state that to the best of my knowledge and belief the information in this certification is not in any way in violation of 30 TAC, Subchapter H, Division 4, §101.370-101.379 or any applicable air quality rule or regulation of the Texas Commission on Environmental Quality and that intentionally or knowingly making or causing to be made false material statements or representations in this certification is a CRIMINAL OFFENSE subject to criminal penalties. I hereby also waive the Federal statute of limitations defense in regards to the generation and use of discrete emission credits.

Signature:  Date: 3-28-14

Title Director of Environmental Affairs

Name: Miller Transporters, Inc.
Facility: Channelview Terminal

2013 DERC Use Calculations:

DERCs Used = ALA X (AER-RER)/ 2000 lb//ton + 10% environmental contribution

Where:

ALA = actual level of activity
AER = actual emission rate per unit activity
RER = regulatory emission rate per unit of activity

Boiler: BLR-1

Assumption:

Actual Fuel Usage = 10,407.2 MMBtu/yr
Actual Emis. Rate = 0.043 lb/MMBtu (from stack test)
Regulatory Emis Rate = 0.036 lb/MMBtu (regulatory standard; 30 TAC 117.2010(c)(1)(A))

$$\begin{aligned} \text{DERCs Used} &= ((10,407.2 \text{ MMBtu/yr} \times 0.043 \text{ lb/MMBtu}) - (10,407.2 \text{ MMBtu/yr} \times 0.036 \text{ lb/MMBtu})) / 2000 \text{ lb/ton} \\ &= 0.036 \text{ tons/year} \end{aligned}$$

Boiler: 95-1

Assumption:

Actual Fuel Usage = 470.3 MMBtu/yr
Actual Emis. Rate = 0.072 lb/MMBtu (from stack test)
Regulatory Emis Rate = 0.036 lb/MMBtu (regulatory standard; 30 TAC 117.2010(c)(1)(A))

$$\begin{aligned} \text{DERCs Used} &= ((470.3 \text{ MMBtu/yr} \times 0.072 \text{ lb/MMBtu}) - (470.3 \text{ MMBtu/yr} \times 0.036 \text{ lb/MMBtu})) / 2000 \text{ lb/ton} \\ &= 0.008 \text{ tons/year} \end{aligned}$$

DERCs Used:	0.036 tons/year
	+ 0.008 tons/year
	<hr/>
	0.10 tons/year (rounded up to nearest tenth of a ton)

Environmental Contribution: 0.10 tons/year + 10% environmental contribution = 0.11 tons/year
(rounded up to nearest tenth of a ton) = 0.20 tons/year

Total DERCs Used = 0.20 tons
DEC-2 NOI = 0.50 tons
DEC-2 Variance = 0.30 tons

**Miller Transporters, Inc.
Channelview Terminal
2013 Annual Natural Gas Fuel Usage**

Source: Boilers

Months	Heat Value MBtu/MMcf *	BLR-1		95-1		Total	
		scf/month	MMBtu/Month	scf/month	MMBtu/Month	scf/month	MMBtu/Month
January	1.0185	687,304.0	700.0	82,423.0	83.9	770,427.0	784.0
February	1.0185	646,297.0	658.3	43,328.0	44.1	690,283.3	702.4
March	1.0179	803,136.0	817.5	51,967.0	52.9	855,920.5	870.4
April	1.0198	837,714.0	854.3	46,204.0	47.1	884,772.3	901.4
May	1.0228	895,726.0	916.1	61,677.0	63.1	958,319.1	979.2
June	1.0296	807,899.0	831.8	31,212.0	32.1	839,942.8	863.9
July	1.0227	930,214.0	951.3	26,850.0	27.5	958,015.3	978.8
August	1.0178	868,875.0	884.3	25,764.0	26.2	895,523.3	910.6
September	1.0566	879,168.0	928.9	21,166.0	22.4	901,262.9	951.3
October	1.0384	962,432.0	999.4	19,542.0	20.3	982,973.4	1,019.7
November	1.0115	862,571.0	872.5	19,871.0	20.1	883,314.5	892.6
December	1.0088	984,019.0	992.7	30,248.0	30.5	1,015,259.7	1,023.2
	scf/yr	10,165,355.0		460,252.0		10,636,014.2	
	MMBtu/yr		10,407.2		470.3		10,877.5

* From 2013 gas utility bills provided by client.

Location:	Miller Transports, Inc. 15855 Wood Drive Channelview, TX	
Date:	8/5/2005	
Boiler Unit:	Superior	EPN: BLR-1
Model No.:	5-5625L	
Test Method:	COSA Combustion Analyzer	
Fuel:	Natural Gas	
Firing Rate:	5.2 MMBtu/hr	
Ambient Temp:	93.3 Deg. F	
Stack Gas		
Temp:	314.4 Deg. F	
O2	7.4 %	
CO2	7.6 %	
Efficiency	88 %	
CO	1 ppm	
CO	1 ppm / 0% O2	
CO	1.3 ppm / 3% O2	
NO	27 ppm	
NOx	43 ppm / 0% O2	
NOx	35.8 ppm / 3% O2	
NOx	0.043 lb/MMBtu	
Ex. Air	53	

Location:	Miller Transports, Inc. 15855 Wood Drive Channelview, TX	
Date:	8/5/2005	
Boiler Unit:	KELCO	EPN: 95-1
Model No.:	560	
Test Method:	COSA Combustion Analyzer	
Fuel:	Natural Gas	
Firing Rate:	3.8 MMBtu/hr	
Ambient Temp:	87.6 Deg. F	
Stack Gas		
Temp:	438.2 Deg. F	
O2	14.9 %	
CO2	3.4 %	
Efficiency	68.3 %	
CO	6 ppm	
CO	20 ppm / 0% O2	
CO	17.9 ppm / 3% O2	
NO	20 ppm	
NOx	71 ppm / 0% O2	
NOx	59.67 ppm / 3% O2	
NOx	0.072 lb/MMBtu	
Ex. Air	244	

MILLER TRANSPORTERS, INC.

SPECIALIST
IN TRANSPORTING BULK
COMMODITIES

P. O. BOX 1123
JACKSON, MISSISSIPPI
39215-1123
601/922-8331

March 28, 2014

Texas Commission on Environmental Quality
Emission Banking and Trading Program (MC-163)
P.O. Box 13087
Austin, TX 78711-3087

Reference: Notice of Use of Discrete Emission Reduction Credits (Form DEC-3)
Miller Transporters, Inc; Channelview Facility
CN600369508; RN102004892

Dear Sir or Madam:

Miller Transporters, Inc. is submitting the enclosed Notice of Use of Discrete Emission Reduction Credits (Form DEC-3) for the above-referenced facility covering the compliance period beginning January 1, 2013 and ending December 31, 2013. A Notice of Intent to Use Discrete Emission Reduction Credits (Form DEC-2) was previously submitted specifying an anticipated total DERC requirement of 0.5 tons for the compliance period.

The attached Form DEC-3 meets the notification requirements of 30 TAC 101.376(e) and includes the actual emissions of Nitrogen Oxides (NO_x) during the use period, the actual amount of DERCs used, and the required environmental contribution.

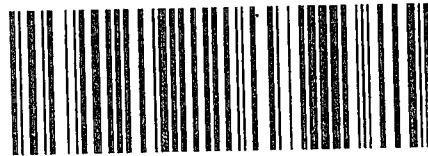
Please do not hesitate to contact me if you have questions, or require further information, regarding this matter.

Sincerely,

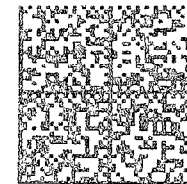


Ed Matlage
Director of Environmental Affairs

Attachments



7012 3050 0000 6339 5358



US POSTAGE
\$ 06.00
Mailed From 39209
03/28/2014
031A 0005180207

Miller Transporters, Inc.
Ed Matlage
P. O. Box 1123
Jackson, MS 39215

206
Texas Commission on Environmental Quality
Emission Banking and Trading Program(MC-163)
P. O. Box 13087
Austin, TX 78711-3087

RECEIVED
APR 01 2014
TCEQ MAIL CENTER
MM

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Zak Covar, *Commissioner*
Toby Baker, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

May 9, 2014

Mr. Ed Matlage
Director of Environmental Affairs
Miller Transporters, Inc.
PO Box 1123
Jackson, Mississippi 39205-1123

Re: Notice of Use of Discrete Emission Credits
Miller Transporters
Channelview, Harris County
Regulated Entity Reference Number: RN102004892
Customer Reference Number: CN600369508
Portfolio Number: P3007

Dear Mr. Matlage:

This letter is in response to a Form DEC-3 (Notice of Use Discrete Emission Credits) received via e-mail on April 1, 2014 from Miller Transporters, Inc., regarding the use of nitrogen oxides (NO_x) discrete emission reduction credits (DERC) for compliance with 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A) for the period of January 1, 2013 through December 31, 2013.

We have reviewed your application and agree that the use of 0.2 ton of NO_x DERCs (including the 10% environmental contribution of 0.1 ton) meets the requirements of 30 TAC §101.376 and §117.2010(c)(1)(A). Because only part of the DERCs set aside from certificate D-2834 were used, enclosed is certificate D-3102 with the 0.3 ton of NO_x DERCs retained by Miller Transporters, Inc. The certificate is deposited in the Texas Commission on Environmental Quality Discrete Emission Credit Registry. The certificate may be transferred or sold to another owner for use per the requirements of 30 TAC §§101.370 through 101.379.

Thank you for your cooperation in this matter. If you have questions concerning this review or need further assistance regarding the banking program, please contact Mr. Joseph Thomas at (512) 239-0012, or write to the Texas Commission on Environmental Quality, Office of Air, Air Quality Division (MC-206), P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Ed Matlage

Page 2

May 9, 2014

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

A handwritten signature in black ink that reads "David Brymer". The signature is written in a cursive, slightly slanted style.

David Brymer, Director
Air Quality Division

DB/JT/ig

cc: Air Section Manager, Region 12 – Houston

Mr. Bob Allen, Director, Harris County Pollution Control Services Department, Pasadena

Mr. Phil Evans, Vice President, Technical Services, WCM Group, Inc., Humble

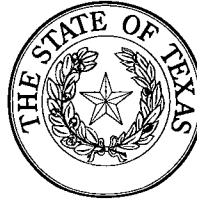
Project: 409217

The State of Texas

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Certificate Number:

D-3102



Number of Credits:

0.3 ton NO_x

Discrete Emission Reduction Credit Certificate

This certifies that
Miller Transporters, Inc.
15855 Wood Drive
Channelview, Texas 77530

is the owner of 0.3 ton of nitrogen oxides (NO_x) discrete emission reduction credits established under the laws of the State of Texas, transferable only on the books of the Texas Commission on Environmental Quality, by the holder hereof in person or by duly authorized Attorney, upon surrender of this certificate.

The owner of this certificate is entitled to utilize the discrete emission credits evidenced herein for all purpose authorized by the laws and regulations of the State of Texas and is subject to all limitations prescribed by the laws and regulations of the State of Texas.

Discrete Emission Reduction Generation Period: May 6, 1999 – May 6, 2000
Generator Regulated Entity No.: RN102534278

County of Generation: Montgomery

Generator Certificate: D-1028

May 9, 2014

Date

David Bryner

Banking and Trading Route Slip

AIR QUALITY DIVISION Emissions Banking and Trading Program (EBTP)			
Company Name:	MILLER TRANSPORTERS, INC		
Project Number:	409 217		
Type of Letter Correspondence:	DCUS	DCTR	DOCT
Letter Document Number(s):	22981	22982	22983
Certificate Number(s):	D-3102		
Review and Approval	Initial and Date	Comments/Special Instructions	
Brandon Greulich, Work Lead EBTP	BGS 5/9/14		
Author/Creator Review	JHS 5/8/2014		
Peer Review Completed	JTG 5/9/14		
Author/Creator	JHS 5/2/2014	Copies Made	Date
		Mailed	Date
		JHS	5/2/2014
Please return Routing Slip and Project Paperwork to Brandon Greulich, MC-206, Ext. 4904			

C 5/12/14