

AIR DERC_100542927-409095_
USE_20140613_Use_D3115

07/09/2014 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 409095
RECEIVED: 03/21/2014STATUS: P
PROJTYPE: BUSEDISP CODE: C✓
ISSUED DT: 07/09/2014
SUP-DISP DATE: 6/13/14

STAFF ASSIGNED TO PROJECT:

MERCADO, PE, MARIE

PROJECT NOTES:

USE PERIOD OF 01/01/2013 THROUGH 12/31/2013. INTENT PROJECTS FOR THIS USE PERIOD INCLUDE #407401, 408323, AND 408418. CERTIFICATES SET-ASIDE INCLUDE D2524, D2522, D3015, D2804, D2758, D2204, & D3702.

PROJECT HOLD: REQUESTED THAT COMPANY VERIFY DERC CERTIFICATES TO BE USED ON APRIL 28, 2014. COMPANY RESPONDED ON JUNE 13, 2014.

ALL SUPPORTING DOCUMENTS ASSOCIATED WITH THIS USE PROJECT ARE UNDER FILED UNDER DERC CERTIFICATE D3114.

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: NRG TEXAS POWER LLC
CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

File Name:
D-3115

CONTACT DATA

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

STREET: 1201 FANNIN ST CITY/STATE, ZIP: HOUSTON, TX , 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2014-04-15 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE

DELETED DATE:

EFFECTIVE YEAR:

TONS: 2.00

DOLLARS: 0

CERTIFICATE NO.: D3114 COUNTY : LIMESTONE

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-15 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: 162.00

DOLLARS: 0

CERTIFICATE NO.: D3113 COUNTY : LIMESTONE

COMPANY DATA

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

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NAME: ELIZABETH KASHI

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PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 69.90

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3015 COUNTY : LIMESTONE

COMPANY DATA

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

CONTACT DATA

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

STREET: 1201 FANNIN ST CITY/STATE, ZIP: HOUSTON, TX , 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 395.10

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D2804 COUNTY : LIMESTONE

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

CONTACT DATA

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

STREET: 1201 FANNIN ST CITY/STATE, ZIP: HOUSTON, TX , 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 503.70

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3097 COUNTY : LIMESTONE

COMPANY DATA

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

CONTACT DATA

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

STREET: 1201 FANNIN ST CITY/STATE, ZIP: HOUSTON, TX , 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 242.40

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D2758 COUNTY : LIMESTONE

COMPANY DATA

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

CONTACT DATA

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

STREET: 1201 FANNIN ST CITY/STATE, ZIP: HOUSTON, TX, 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2014-04-22 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE

DELETED DATE:

EFFECTIVE YEAR:

TONS: 137.40

DOLLARS: 0

CERTIFICATE NO.: **D3115** COUNTY: LIMESTONE*file here***TRANSACTION DATA**

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-22 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE

DELETED DATE:

EFFECTIVE YEAR:

TONS: 1243.10

DOLLARS: 0

CERTIFICATE NO.: **D3098** COUNTY: LIMESTONE**COMPANY DATA**

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

PORTFOLIO DATA

NUMBER: P3185 NAME: NRG - LIMESTONE ELECTRIC - RN100542927

SITE DATA

ACCOUNT: LI0027L

REG ENTITY ID: RN100542927

SITE NAME: LIMESTONE ELECTRIC GENERATING STATION

COUNTY: LIMESTONE

NEAREST CITY: JEWETT

LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

CONTACT DATA

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

STREET: 1201 FANNIN ST CITY/STATE, ZIP: HOUSTON, TX, 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrgenergy.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2014-04-22 00:00:00.0

CONTAMINATE: NOX

DELETED DATE:

EFFECTIVE YEAR:

TONS: 1067.50

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D2522 COUNTY : LIMESTONE

TRACKING ACTIVITES

PM RECEIVED DATE :

04/17/2014

PROJECT HOLD :

04/28/2014

06/13/2014

LETTER ISSUED :

7/9/14

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

Project No.:	409095	Customer Reference No.:	CN603207218
Project Type:	BUSE	Regulated Entity Reference No.:	RN100542927
Company:	NRG Texas Power, LLC	Facility Name:	Limestone Electric Generating Station
City:	Jewett	County:	Limestone
Project Manager:	Ms. Marie Mercado, P.E.	Portfolio Name:	P3185

Project Overview

NRG Texas Power, LLC (NRG), submitted a Form DEC-3, Notice of Use Discrete Emission Credits, received on March 21, 2014, for compliance with 30 Texas Administrative Code (TAC) §117.3020 at the Limestone Electric Generating Station. The site has two electric generating units, Facility Identification Numbers (FIN) LMS1 and LMS2. NRG set aside 3,821.1 tons of nitrogen oxides (NO_x) Discrete Emission Reduction Credits (DERC) using three Forms DEC-2 (Intent to Use Discrete Emission Credits) received on November 15, 2012 (project number 407401), June 17, 2013 (project number 408323), and October 21, 2013 (project number 408418) to comply with the requirement in 30 TAC §101.376 to have DERCs available for the period of January 1, 2013 through December 31, 2013, August 1, 2013 through December 31, 2013, and December 1, 2013 through December 31, 2013, respectively. Note that the DERCs from the first Form DEC-2 were still being used when the second Form DEC-2 was received and processed and the DERCs from the second Form DEC-2 were still being used when the third Form DEC-2 was received and processed.

The Form DEC-3 was received within 90 days of the end of the period. Not including the 2.0 tons of NO_x DERCs held to avoid generating a new certificate, the associated intent projects set aside 3,821.1 tons of NO_x DERCs for the period from certificates D-2524 (503.7 tons), D-2522 (1067.5 tons), D-3015 (69.9 tons), D-2804 (395.1 tons), D-2758 (242.4 tons), D-2204 (164.0 tons), and D-3072 (1380.5 tons). NRG reported that 3,683.7 tons of NO_x DERCs (including the 10% environmental contribution of 334.9 tons) were needed for compliance with §117.3020 during the use period. Therefore, the entire amounts set aside from certificates D-2524 (use certificate D-3097), D-2522, D-3015, D-2804, and D-2758 have been used, as well as 162.0 and 1,243.1 tons of the amount set aside from certificate D-2204 (use certificate D-3113) and D-3072 (use certificate D-3098), respectively. The unused 139.4 tons set-aside from certificates D-2204 (D-3113) and D-3072 (D-3098) are being returned to NRG as certificate D-3114 and D-3115, respectively. Certificate D-3114 was generated to return 2.0 tons that were included in the Intent to Use project number 408323 to avoid creating a small retain certificate but were not set-aside for the purpose of complying with §117.3020.

Discrete Emission Credit Use

The Limestone Electric Generating Station has two boilers, FINs LMS1 and LMS2, which are subject to §117.3020. NRG used DERCs to cover their excess NO_x emissions above their system cap limit through the use of 3,348.8 tons of DERCs during the use period of January 1, 2013 through December 31, 2013. For the 10% environmental contribution, an additional 334.9 tons were needed, resulting in a total of 3,683.7 tons of NO_x DERCs being used.

Certificate Used.....	D-2524 (D-3097), D-2522, D-3015, D-2804, D-2758, D-2204 (D-3113), & D-3072 (D-3098)
Pollutant.....	NO _x
Amount Used.....	3,683.7 tons
Regulation.....	§117.3020
Compliance period.....	01/1/2013 – 12/31/2013

Credit Use Calculation Methods

Boilers LMS1 and LMS2 have continuous emissions monitoring systems (CEMS) for measuring NO_x emissions; therefore, NRG monitors the total emissions on an ongoing basis. NRG calculated the actual emission rate for each unit on the Form DEC-3 by dividing the actual emissions in tons by the actual activity in million British thermal units (MMBtu). The reported regulated total emissions was based on the system cap emission limitations determined using §117.3020(c). The control plan for the site was provided as supporting documentation in project number 408418, which includes a spreadsheet that provides the system cap value for each boiler.

The applicant opted to use the equation referenced below to calculate the amount of discrete emission credits required to comply with §117.3020, which during the use period reflects the more stringent regulatory requirement when compared to the regulatory emission rate of 0.165 pound per MMBtu. NRG provided calculations as supplemental data.

$$DERCs = \sum_{a=1}^N [(AH_a \times AR_a) - (H_a \times R_a)]$$

a = each emission unit in the system cap

N = total number of emission units in the system cap

AH_a = actual annual heat input

AR_a = actual annual average emission factor

$H_a = H_i$, specified in §117.3020(c)

$R_a = R_i$, specified in §117.3020(c)

LMS1

DERCs used = 5,877.9 tons – 5,081.5 tons = 796.4 tons

LMS2

DERCs used = 7,383.9 tons – 4,831.5 tons = 2,552.4 tons

Total DERCs needed for 2013 compliance

796.4 tons + 2,552.4 tons = 3,348.8 tons

10% environmental contribution = 334.9 tons (rounded up to nearest 0.1 ton)

Total DERCs used = 3,348.8 tons + 334.9 tons = 3,683.7 tons

Conclusion

NRG has submitted all required documentation for the use of NO_x DERCs to be in compliance with §101.376. Based on data that NRG reported, it is calculated that 3,683.7 tons of NO_x DERCs (including the 10% environmental contribution of 334.9 tons) were needed for excess emission from the two boilers at the Limestone Electric Generating Station during the period of January 1, 2013 to December 31, 2013. Certificates D-2524 (D-3097), D-2522, D-3015, D-2804, D-2758, D-2204 (D-3113), and D-3072 (D-3098) have been cancelled, and the remaining 139.4 tons are being returned to NRG on certificates D-3114 and D-3115.

Cruz Monreal Mercado 6/17/14
Project Manager Date

DeBI 6/23/14
Peer Reviewer Date

Braulio 7/1/2014
Work Lead Date

DERC Use Project 409095 Review

INTENT PROJECT	USE PROJECT	PERIOD START DATE	PERIOD END DATE	INTENT CERTIFICATE	GENERATION COUNTY	TOTAL AMOUNT	INTENT AMOUNT	USE AMOUNT	USE CERT	RET CERT
407401	409095	1/1/2013	12/31/2013	D2524	FORT BEND	832.8	503.7	503.7	D3097	N/A
408323		8/1/2013	12/31/2013	D2204	FORT BEND	164	164	162	D3113	D3114
				D2522	LIMESTONE	1067.5	1067.5	1067.5	D2522	N/A
				D2758	FORT BEND	242.4	242.4	242.4	D2758	N/A
				D2804	FORT BEND	395.1	395.1	395.1	D2804	N/A
				D3015	LIMESTONE	69.9	69.9	69.9	D3015	N/A
408418		12/1/2013	12/31/2013	D3072	FORT BEND	5113	1380.5	1243.1	D3098	D3115

D3113 missing record in BK_CERT_TREE
Added on 7/1/2014

DERC Intent/Use History for P3185 (Limestone)

INTENT PROJECT	INTENT RECEIVED	PERIOD START DATE	PERIOD END DATE	USE PROJECT	USE RECEIVED	INTENT CERTIFICATE	TOTAL AMOUNT	INTENT AMOUNT	USE AMOUNT					
400845	11/18/2005	1/1/2006	12/31/2006	401663	4/5/2007	D2198	5251.8	2437	2437					
401196	9/17/2006	1/1/2006	12/31/2006	401663	4/5/2007	D2202	1325.7	1270.1	185.1					
401240	11/27/2006	1/1/2007	12/31/2007	402523	3/20/2008	D2201	1284.8	1284.8	1284.8					
						D2410	2814.8	2096	1028.5					
402104	11/19/2007	1/1/2008	12/31/2008	403715	4/3/2009	D2199	1369.5	1369.5	1369.5					
403089	9/23/2008	1/1/2008	12/31/2008	403715	4/3/2009	D2525	1330	1204.9	1204.9					
404579	11/11/2008	1/1/2009	12/31/2009	404537	3/15/2010	D2513	2736	2727.4	1894.6					
404219	11/18/2009	1/1/2010	12/31/2010	405594	3/17/2011	D2514	2560	2457.2	2214.8					
405127	11/17/2010	1/1/2011	12/31/2011	406692	2/23/2012	D2691	5048	2633.2	1305.8					
405902	6/10/2011	1/1/2011	12/31/2011	406692	2/23/2012	D2698	2414.8	1298.3	1298.3					
406031	8/22/2011	1/1/2011	12/31/2011	406692	2/23/2012	D2797	1116.5	721.4	721.4					
406178	11/16/2011	1/1/2012	12/31/2012	407820	2/13/2013	D2200	111.1	111.1	111.1					
						D2203	61.7	61.7	0					
						D2204	164	164	0					
						D2512	55.6	55.6	55.6					
						D2517	1085	1085	1085					
						D2518	718.8	718.8	648.9					
						D2519	8.6	8.6	0					
						D2520	102.8	102.8	0					
						D2522	1067.5	1067.5	0					
						D2526	125.1	125.1	0					
407401	11/15/2012	1/1/2013	12/31/2013	409095	3/21/2014	D2804	395.1	395.1	0					
						D2524	832.8	503.7	TBD					
						D2204	164	164	TBD					
						D2522	1067.5	1067.5	TBD					
						D2758	242.4	242.4	TBD					
						D2804	395.1	395.1	TBD					
						D3015	69.9	69.9	TBD					
						D3072	5113	1380.5	TBD					
						408418	10/21/2013	12/1/2013	12/31/2013	Due by 3/31/2015	D3082	3732.5	3732.5	TBD
						408487	11/18/2013	1/1/2014	12/31/2014		D3084	62.5	62.5	TBD

Available Certificates in P3185, as of 5/30/2014

Certificate	Pollutant	Tons
D3085	NOX	805.2
D3086	NOX	662.4
D3089	NOX	1090

INTENT PROJECT	INTENT RECEIVED	INTENT CERTIFICATE	POLLUTANT	INTENT AMOUNT	TOTAL AMOUNT	PERIOD START DATE	PERIOD END DATE
407401	11/15/2012	D2524	NOX	503.7	832.8	1/1/2013	12/31/2013
408323	6/17/2013	D2204	NOX	164	164	8/1/2013	12/31/2013
408323	6/17/2013	D2522	NOX	1067.5	1067.5	8/1/2013	12/31/2013
408323	6/17/2013	D2758	NOX	242.4	242.4	8/1/2013	12/31/2013
408323	6/17/2013	D2804	NOX	395.1	395.1	8/1/2013	12/31/2013
408323	6/17/2013	D3015	NOX	69.9	69.9	8/1/2013	12/31/2013
408418	10/21/2013	D3072	NOX	1380.5	5113	12/1/2013	12/31/2013

3823.1 - 2.0 (no cert generated) = 3821

Listed in Form
1/10/2014

D2569

Never
obtained
309.8

HGB
Cap

D2812,
1090

12/17/13

D2061,
62.50

D-3084

12/17/13

D2063,
805.2

12/17/13

D2059
662.40

4

Set aside

2014

Intent

#408487



Form DEC-3 (Page 1)
Not of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

Received

MAR 21 2014

409095

M-1

Air Quality Division

I. COMPANY IDENTIFYING INFORMATION

A. Company Name: NRG Texas Power LLC ✓

Mailing Address: 1201 Fannin Street

City: Houston

State: TX

Zip Code: 77002

Telephone: 832-357-5291

Fax: 832-584-2111

B. TCEQ Customer Number (CN): 603207218 ✓

C. Site Name: Limestone Electric Generating Station

Street Address (If no street address, give driving directions to site): 3964 FM 39

Nearest City: Jewett

Zip Code: 75846

County: Limestone

D. TCEQ Regulated Entity Number (RN): 100542927 ✓

E. TCEQ Air Account Number: (if applicable) LI-0027-L -

P3185

F. Primary SIC: 4911

Air Permit Number: O-00075/8576

II. TECHNICAL CONTACT IDENTIFYING INFORMATION

A. Technical Contact Name: (☐ Mr. ☒ Mrs. ☐ Ms. ☐ Dr.) : Liz Kashi

Technical Contact Title: Environmental Specialist

Mailing Address: 1201 Fannin Street

City: Houston

State: TX

Zip Code: 77002

Telephone: 832-357-5292

Fax: 832-584-2114

E-mail: liz.kashi@nrgenergy.com

III. COMPANY CONTACT IDENTIFYING INFORMATION

A. Company Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : Craig R. Eckberg

Company Contact Title: Sr. Manager, Environmental Business

Mailing Address: 1201 Fannin Street

City: Houston

State: TX

Zip Code: 77002

Telephone: 832-357-5291

Fax: 832-584-2111

E-mail: craig.eckberg@nrgenergy.com

IV. Mass Emission Cap and Trade Program (MECT)

Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? ☐ Yes ☒ No

Year DERC Generated: _____ Year of use: _____ Ratio of DERC to Allowance: _____ to _____

Note: If DERC use is to comply with MECT then go to Section X

V. Use Period

Use Start Date: 01/ 01/ 2013

Use End Date: 12/ 31/ 2013



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

VI. State and Federal Requirements

Applicable State and Federal requirements that the DERCs will be used for compliance:

30 TAC 117.3020

VII. Most Stringent Emission Rate

Describe basis for most stringent allowable emission rate:

☐ Permit : _____ ☐ RACT : _____ ☒ Other: 0.165 lb/mmBtu

Notes:

VIII. PROTOCOL

Protocol used to calculate DERC:

Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form

CEMS Data (See Attached)

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)
LMS1	1	NOx	56,017,740 MMBtu	0.206 lb/mmBtu	5,877.9		0.165 lb/mmBtu	5,081.5	796.4
LMS2	2	NOx	70,703,846.7 MMBtu	0.208 lb/mmBtu	7,383.9		0.165 lb/mmBtu	4,831.5	2,552.4
								Total:	3,348.8



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>3,348.8</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>334.9</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS Used	CO: _____	NO _x : <u>3,683.7</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

XI. DERC INFORMATION

Name of the DERC Generator: Limestone Electric Generating Station
DERC Generator Regulated Entity Number: RN100542927
Certificate number of the DERCS acquired or to be acquired: D-3015, D-2522, D-2059, D-2061, D-2063, D-3072, D-2524, D-2804, D-2758, D-2204 (Please use certificates D-3015, D-2522, D-2059, D-2061, D-2063, and D-3072, release any remaining balance from D-3072. NRG requests that certificates D-2524, D-2804, D-2758, and D-2204 be returned for future use.)

Note: The certificate number is assigned by the TCEQ

XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

I, Craig R. Eckberg, 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: C.R. Eckberg Date: 18 Mar 14
Title Sr. Manager, Environmental Business

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 9, 2014

Ms. Liz Kashi
Environmental Specialist
NRG Texas Power, LLC
1201 Fannin Street
Houston, Texas 77002

Re: Use of Discrete Emission Credits
Limestone Electric Generating Station
Jewett, Limestone County
Regulated Entity Reference Number: RN100542927
Customer Reference Number: CN603207218
Portfolio Number: P3185

Dear Ms. Kashi:

This letter is in response to NRG Texas Power, LLC's (NRG) Notice of Use of Discrete Emission Credits (Form DEC-3) received March 21, 2014 regarding the use of nitrogen oxides (NO_x) discrete emission reduction credits (DERC) for the purpose of compliance with 30 Texas Administrative Code (TAC) §117.3020 for the period of January 1, 2013 through December 31, 2013 at the Limestone Electric Generating Station.

We have reviewed your application and agree that the use of 3,683.7 tons of NO_x DERCs (including the 10% environmental contribution of 334.9 tons) meets the requirements of 30 TAC §101.376 for compliance with §117.3020. These emission credits have been used from certificates D-2524, D-2522, D-3015, D-2804, D-2758, D-2204, and D-3072, which are now cancelled. The remaining 139.4 tons of NO_x DERCs will be retained on certificates D-3114 and D-3115. Enclosed is a copy of D-3114 and D-3115 issued to NRG Texas Power, LLC, in the amounts of 2.0 and 137.4 tons of NO_x DERCs, respectively. These certificates have been deposited in the Texas Commission on Environmental Quality (TCEQ) Discrete Emission Credit Registry. This certificate may be transferred or sold to another owner for use per the requirements of §§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 Ms. Marie Mercado, P.E., at (512) 239-2054, or write to the Texas Commission on Environmental Quality, Office of Air, Air Quality Division (MC-206), PO Box 13087, Austin, Texas 78711-3087.

Ms. Liz Kashi
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July 9, 2014

This action is taken under authority delegated by the executive director of the TCEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "David Brymer". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Brymer".

David Brymer, Director
Air Quality Division

DB/MM/db

cc: Air Section Manager, Region 9 – Waco

Project Number: 409095

The State of Texas

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Certificate Number:

D-3115



Number of Credits:

137.4 tons NOx

Discrete Emission Reduction Credit Certificate

This certifies that
NRG Texas Power, LLC
1200 Fannin Street
Houston, Texas 77002

is the owner of 137.4 tons of nitrogen oxides (NOx) 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: April 1, 2001 to March 31, 2002

Generator Regulated Entity No.: RN100888312

Generator Certificate: D-1047

County of Generation: Fort Bend

July 9, 2014

Date

A handwritten signature in black ink, appearing to read "David Bryan".

For the Commission

Banking and Trading Route Slip

AIR QUALITY DIVISION Emissions Banking and Trading Program (EBTP)				
Company Name: NRG Texas Power, LLC				
Project Number: 409095				
Type of Letter Correspondence: DCUS ; DCTR ; DOCT ; DCCT				
Letter Document Number(s): 22943 ; 22933 ; 22942 ; 23150				
Certificate Number(s): Various 3115 ; 3114				
Review and Approval	Initial and Date	Comments/Special Instructions		
Lindley Anderson, Team Lead Stationary Source Programs				
Brandon Greulich, Work Lead EBTP	BG 7/1/14	minor edits to TR, letter, cert		
Author/Creator Review	MM 6/23/14			
Peer Review Completed	D3 6/23/14			
Author/Creator	MM 6/13/14		Copies Made	Date
			MM	7/9
			Mailed	Date
			MM	7/9
Please return Routing Slip and Project Paperwork to Brandon Greulich, MC-206, Ext. 4904				

C 7/11/14