

AIR DERC_100542927-410439_
USE_20160122_Use_D3195

01/22/2016 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 410439 STATUS: P
RECEIVED: 01/06/2016 PROJTYPE: BUSE

DISP CODE: C
ISSUED DT:
SUP-DISP DATE: 1/22/2016

STAFF ASSIGNED TO PROJECT:
MERCADO, PE, MARIE

PROJECT NOTES:

PROJECT HOLD: WAITING ON AAR FORM. RECEIVED ELECTRONICALLY 01/18/2016.
PROJECT HOLD: REQUESTED ADDITIONAL SUPPORTING DOCUMENTATION ON 01/21/2016. COMPANY PROVIDED ON 01/22/2016.

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

D-3195

CONTACT DATA

NAME: LINDSAY W. LITTLE TITLE: AIR PROGRAM MANAGER, GULF
STREET: 1201 FANNIN STREET CITY/STATE, ZIP: HOUSTON, TX , 77002-0
PHONE: 832-357-5293 ext 0
Email: lindsay.little@nrg.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2016-01-08 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX TONS: 1090.00 DOLLARS: 0
ALLOWANCE0 CERTIFICATE NO.: D3089 COUNTY : LIMESTONE

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE
DATE ENTERED: 2016-01-08 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX TONS: 0 DOLLARS: 0
ALLOWANCE0 CERTIFICATE NO.: 0 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: LINDSAY W. LITTLE

TITLE: AIR PROGRAM MANAGER, GULF

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

PHONE: 832-357-5293 ext 0

Email: lindsay.little@nrg.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2016-01-21 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 2.00

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3114 COUNTY : LIMESTONE

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2016-01-21 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 0

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: 0 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: LINDSAY W. LITTLE

TITLE: AIR PROGRAM MANAGER, GULF

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

PHONE: 832-357-5293 ext 0

Email: lindsay.little@nrg.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2016-01-21 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 137.40

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3115 COUNTY : LIMESTONE

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2016-01-21 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:

TONS: 0 DOLLARS: 0

CERTIFICATE NO.: 0 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: LINDSAY W. LITTLE

TITLE: AIR PROGRAM MANAGER, GULF

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

PHONE: 832-357-5293 ext 0

Email: lindsay.little@nrg.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2016-01-21 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:

TONS: 941.90 DOLLARS: 0

CERTIFICATE NO.: D3195 COUNTY : LIMESTONE

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2016-01-21 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:

TONS: 0 DOLLARS: 0

CERTIFICATE NO.: 0 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: LINDSAY W. LITTLE

TITLE: AIR PROGRAM MANAGER, GULF

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

PHONE: 832-357-5293 ext 0

Email: lindsay.little@nrg.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2016-01-21 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: 17.70

DOLLARS: 0

CERTIFICATE NO.: D3224 COUNTY : LIMESTONE

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2016-01-21 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: 0

DOLLARS: 0

CERTIFICATE NO.: 0 COUNTY : LIMESTONE

TRACKING ACTIVITES

PROJECT

SUBMITTED :

01/04/2016 PROJECT HOLD :

01/08/2016 01/22/2016 PM RECEIVED DATE : 01/08/2016

PROJECT COMPLETED : 1/25/2016

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

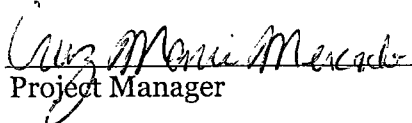
Project No.:	410439	Customer Reference No.:	CN603207218
Project Type:	BUSE	Regulated Entity Reference No.:	RN100542927
Company:	NRG Texas Power, LLC	Facility Name:	Limestone Electric Generating Station
City:	Jewett	County:	Limestone
Project Manager:	Ms. Marie Mercado, P.E.	Portfolio Name:	P3185


Project Overview

NRG Texas Power, LLC (NRG), submitted a Notice of Use Discrete Emission Credits application, received on January 6, 2016, for compliance with 30 Texas Administrative Code (TAC) §117.3020 at the Limestone Electric Generating Station. The site has two coal-fired boilers, Facility Identification Numbers (FIN) LMS1 and LMS2.

Intent to Use Projects..... 409467 and 410320
 Intent Amount..... 2,189 tons (D-3089, D-3114, D-3115, D-3195, and D-3196)
 Use AmountZero tons
 Retained Amount.....2,189 tons (D-3089, D-3114, D-3115, D-3195, and D-3224)
 Pollutant.....NO_x
 Regulation..... §117.3020
 Use period/Use Date..... 01/01/15 - 12/31/15

DERC certificates D-3089, D-3114, D-3115, D-3195, and D-3224 will be deposited in the Texas Commission on Environmental Quality (TCEQ) Discrete Emission Credit Registry for NRG's future use.

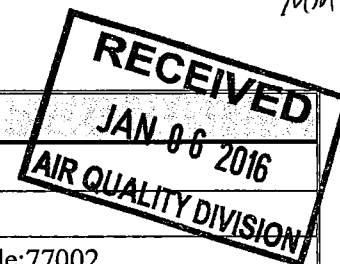
 1/25/16
 Project Manager Date

 1/25/2016
 Peer Reviewer Date



Form DEC-3 (Page 1)
No. 410439 of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

MM



I. COMPANY IDENTIFYING INFORMATION <u>410439</u>			
A. Company Name: NRG Texas Power LLC			
Mailing Address: 1201 Fannin Street			
City: Houston	State: TX	Zip Code: 77002	
Telephone: 832-357-5293		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): RN100542927 <u>P3185</u>			
E. TCEQ Air Account Number: (if applicable) LI-0027-L			
F. Primary SIC: 4911		Air Permit Number: O-00075/8576	
II. TECHNICAL CONTACT IDENTIFYING INFORMATION			
A. Technical Contact Name: (<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> 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@nrg.com	
III. COMPANY CONTACT IDENTIFYING INFORMATION			
A. Company Contact Name: (<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : Lindsay W. Little			
Company Contact Title: Air Program Manager, Gulf Coast			
Mailing Address: 1201 Fannin Street			
City: Houston	State: TX	Zip Code: 77002	
Telephone: 832-357-5293	Fax: 832-584-2111	E-mail: lindsay.little@nrg.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 _____			
Note: If DERC use is to comply with MECT then go to Section X			
V. Use Period			
Use Start Date: <u>01/ 01/ 2015</u>		Use End Date: <u>12/ 31/ 2015</u>	



Form DEC-3 (Page 2)
No. of Use of Discrete Emission Credit
(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 117.3010, 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

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	NRG Texas did not exceed the System Cap limit during the use period, 1/1/15 – 12/31/15.							0
LMS2	2									
								Total:	0	



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</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</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS Used	CO: _____	NO _x : <u>0</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-3089, D-3114, D-3115, D-3195, D-3196

Note: The certificate number is assigned by the TCEQ

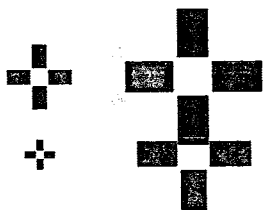
XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

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: _____

Date: _____

Title Director, Environmental Services



CERTIFIED MAIL: RETURN RECEIPT REQUESTED

January 4, 2016

Ms. Lindley Anderson
Emission Banking and Trading Program, MC 206
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

**SUBJECT: Notice of Use of Discrete Emission Reduction Credits (Form DEC-3)
Limestone Electric Generating Station
Jewett, Limestone County
Account #: LI-0027-L
CN603207218; RN100542927**

Dear Ms. Anderson:

NRG Texas Power LLC (NRG Texas) is providing the enclosed DEC-3 Form and supporting documentation to demonstrate compliance with the requirements of Title 30 Texas Administrative Code (TAC), Chapter 117 and Chapter 101.376 regarding the Notice of Use of Discrete Emission Reduction Credits (DERCs) for the Limestone Electric Generating Station.

NRG Texas does not need to use the flexibility provided in 30 TAC 117.3020 for the use period beginning January 1, 2015 through December 31, 2015. However, on November 12, 2014, NRG Texas filed a notice of intent to use DERCs to comply with the emission requirements of this plan. In addition, NRG Texas submitted a supplemental Notice of Intent filing on September 2, 2015. The DERC distribution and use for the period of January 1, 2015 to December 31, 2015 is summarized in the following table.

DERC DISTRIBUTION	AMOUNT (tons)
Intended for Use (1/1/2015 - 12/31/2015)	1903.3
Actual Use in 2015	0
10% Environmental Contribution	0
Total DERCs Used	0
Excess Credits Remaining	1903.3

If you have any questions or require additional information, please do not hesitate to contact Lindsay Little at (832) 357-5293 or lindsay.little@nrg.com.

Sincerely,


Craig R. Eckberg
Director, Environmental Services

cc: Mr. Jason Neumann, TCEQ Region 9, Air Section Manager, Waco, TX

Marie Mercado

From: Little, Lindsay <Lindsay.Little@nrg.com>
Sent: Friday, January 22, 2016 8:17 AM
To: Marie Mercado
Subject: RE: Notice of Use of Discrete Emission Credits, Limestone Electric Generating Station, RN100542927 (P3185)
Attachments: LMS DERC 2015 Documentation_012216.pdf

Hi Marie,

Attached please find the requested documentation that no DERCs were used at Limestone in 2015. Note that the NOx CEMS emissions data is still under quarterly / annual data QA and could change slightly prior to the AEI submittal in March, but any changes would be minimal and would not impact the use of DERCs. Emissions from Units 1 and 2 in 2015 did not exceed Limestone's Chapter 117 System Cap of 9,913.0 tons/year.

Please let me know if you have any questions.

Thanks!
Lindsay



Lindsay W. Little
Air Program Manager, Gulf Coast
1000 Main St., Houston, TX 77002
(p) 832.357.5293
(c) 281.796.9507

Note: The information contained in this e-mail and any accompanying documents may contain information that is confidential or otherwise protected from disclosure. If you are not the intended recipient of this message, or if this message has been addressed to you in error, please immediately alert the sender by reply e-mail and then delete this message, including any attachments. Any dissemination, distribution or other use of the contents of this message by anyone other than the intended recipient is strictly prohibited.

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]
Sent: Thursday, January 21, 2016 2:00 PM
To: Little, Lindsay
Cc: Kashi, Liz
Subject: FW: Notice of Use of Discrete Emission Credits, Limestone Electric Generating Station, RN100542927 (P3185)
Importance: High

Good Afternoon Ms. Little,

Please provide supporting documentation for the zero DERC use for the 2015 control period.

Thank you,

Marie Mercado, P.E.
Engineer IV/EBT PIR Lead

Texas Commission on Environmental Quality
Emissions Trading and Banking Program, MC-206
Office of Air, Air Quality Division

PO BOX 13087
Austin, Texas 78711-3087
512.239.2054 (Direct)
512.239.6188
Marie.Mercado@tceq.texas.gov

Limestone 2015 NOx DERC Position

	Annual Emissions Cap (tpy)	YTD Emissions (tons)	DERCs Consumed
LMS1	5,081.5	3,898.2	0.0
LMS2	4,831.5	4,887.5	
	9,913.0	8,785.7	

2015 Monthly NOx Emissions (tons)	
LMS1	LMS2
544.3	475.8
97.5	442.7
8.2	578.1
380.5	445.0
420.1	492.9
420.1	436.2
414.7	424.3
465.8	513.6
436.6	405.9
369.1	134.1
167.2	155.3
174.1	383.6

E-MAILED
11/22/16

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 25, 2016

Mrs. Lindsay W. Little
Air Program Manager, Gulf Coast
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 Mrs. Little:

This letter is in response to NRG Texas Power, LLC's (NRG) Notice of Use of Discrete Emission Credits application, received January 6, 2016, 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, 2015 through December 31, 2015 at the Limestone Electric Generating Station.

We have reviewed your application and agree that no DERCs were used during the 2015 control period. The emission credits from certificates D-3089, D-3114, D-3115, D-3195, and D-3224 in the amount of 2,189 tons have been deposited in the Texas Commission on Environmental Quality (TCEQ) Discrete Emission Credit Registry for use by NRG in Intent to Use projects 409467 and 410320. These certificates 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.

Mrs. Lindsay Little

Page 2

January 25, 2016

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 a long horizontal stroke at the end.

David Brymer, Director
Air Quality Division

DB/MM/jcm

cc: Air Section Manager, Region 9 – Waco

Project Number: 410439

Banking and Trading Route Slip

AIR QUALITY DIVISION Emissions Banking and Trading Program (EBTP)				
Company Name: NRG Texas Power, LLC Limestone Electric Generating Station, RN100542927 P3185				
Project Number: 410439				
Type of Letter Correspondence: DCTR, DCUS				
Letter Document Number(s): 25806; 25807				
Certificate Number(s): D-3089, D-3114, D-3115, D-3195, D-3196, D-3224				
Review and Approval	Initial and Date	Comments/Special Instructions		
Deric Patton, Work Lead EBTP	—	—		
Author/Creator Review	MM 1/25/2016			
Peer Review Completed	JCM 1/22/2016			
Author/Creator	MM 1/22/16	Copies Made	Date	
		MM	1/25	
		Mailed	Date	
		MM	1/25	
Please return Routing Slip and Project Paperwork to Deric Patton, MC-206, Ext. 3159				

C
1/25/2016
MM