

AIR DERC\_100542927-409859\_  
USE\_20150930\_Use\_D3198

**09/29/2015 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 409859  
RECEIVED: 03/04/2015

STATUS: P  
PROJTYPE: BUSE

DISP CODE: C

ISSUED DT:

SUP-DISP DATE: 9/30/2015 ✓**STAFF ASSIGNED TO PROJECT:**

MERCADO, PE, MARIE

**PROJECT NOTES:**

ASSOCIATED DERC INTENT PROJECTS: 408487 &amp; 409297 - MR &amp; MM

PROJECT HOLD: PROJECTS WERE HANDLED IN ORDER OF PRIORITY. HOLD ENDED ON 8/14/2015.

**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

**CONTACT DATA**

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

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

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrg.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2015-03-10 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 62.50

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3084 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 STREET CITY/STATE, ZIP: HOUSTON, TX, 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrg.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2015-09-28 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 805.20

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3085 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 STREET CITY/STATE, ZIP: HOUSTON, TX, 77002-0

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrg.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2015-09-28 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 662.40

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3086 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  
LOCATION: 9 MILES NORTH OF JEWETT, TEXAS ON FM 39

NEAREST CITY: JEWETT

**CONTACT DATA**

NAME: ELIZABETH KASHI

TITLE: ENVIRONMENTAL SPECIALIST

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

PHONE: 832-357-5292 ext 0

Email: liz.kashi@nrg.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2015-09-28 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 2756.90

DOLLARS: 0

ALLOWANCE

CERTIFICATE NO.: D3199 COUNTY : LIMESTONE

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2015-09-28 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 975.60

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: ~~D3198~~ COUNTY : LIMESTONE

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**TRACKING ACTIVITES**

PROJECT SUBMITTED : 03/02/2015 PROJECT HOLD :

03/23/2015 08/14/2015 PM RECEIVED DATE : 03/23/2015

PROJECT COMPLETED : 10/9/15

## DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

Project No.:	409859	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 (Form DEC-3) received on March 4, 2015, 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 5,262.6 tons of nitrogen oxides (NO<sub>x</sub>) Discrete Emission Reduction Credits (DERC) using two Intent to Use Discrete Emission Credits forms (DEC-2 forms) received on November 18, 2013 (project 408487) and June 16, 2014 (project 409297) to comply with the requirement in §101.376 to have DERCs available for the period of January 1, 2014 through December 31, 2014 and August 1, 2014 through December 31, 2014, respectively.

The Form DEC-3 was received within 90 days of the end of the period. The associated intent projects set aside 5,262.6 tons of NO<sub>x</sub> DERCs for the period from certificates D-3084 (62.5 tons), D-3085 (805.2 tons), D-3086 (662.4 tons), and D-3082 (3,732.5 tons). NRG reported that 2,505.7 tons of NO<sub>x</sub> DERCs (including the 10% environmental contribution of 227.8 tons) were needed for compliance with §117.3020 during the use period. Therefore, the entire amounts set aside from certificates D-3084, D-3085, and D-3086 have been used, as well as 975.6 tons of the amount set aside from certificate D-3082 (use certificate D-3199). The unused 2,756.9 tons set aside from certificates D-3082 (return certificate D-3199) have been deposited in the DERC registry for use by NRG in Intent to Use project 410320.

### Discrete Emission Credit Use

The Limestone Electric Generating Station has two coal-fired boilers, FINs LMS1 and LMS2, which are subject to §117.3020. NRG used NO<sub>x</sub> DERCs to cover their excess NO<sub>x</sub> emissions above their system cap limit through the use of 2,277.9 tons of NO<sub>x</sub> DERCs during the use period of January 1, 2014 through December 31, 2014. To cover the required 10% environmental contribution, an additional 227.8 tons of NO<sub>x</sub> DERCs were needed, resulting in a total of 2,505.7 tons of NO<sub>x</sub> DERCs being used.

Certificate Used.....	D-3084, D-3085, D-3086, & D-3082 (D-3198 use certificate)
Pollutant.....	NO <sub>x</sub>
Amount Used.....	2,505.7 tons
Regulation.....	§117.3020
Compliance period.....	01/1/2014 – 12/31/2014

### Credit Use Calculation Methods

Boilers LMS1 and LMS2 have continuous emissions monitoring systems (CEMS) for measuring NO<sub>x</sub> 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 pounds 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.

$$DERCs = \sum_{\alpha=1}^N [(AH_{\alpha} \times AR_{\alpha}) - (H_{\alpha} \times R_{\alpha})]$$

$\alpha$  = each emission unit in the system cap

$N$  = total number of emission units in the system cap

$AH_{\alpha}$  = actual annual heat input

$AR_{\alpha}$  = actual annual average emission factor

$H_{\alpha} = H_i$ , specified in §117.3020(c)

$R_{\alpha} = R_i$ , specified in §117.3020(c)

#### LMS1

DERCs used = 6,309.7 tons – 5,081.5 tons = 1,228.2 tons

#### LMS2

DERCs used = 5,881.2 tons – 4,831.5 tons = 1,049.7 tons

#### Total DERCs needed for 2014 compliance

1,228.2 tons + 1,049.7 tons = 2,277.9 tons

10% environmental contribution = 227.8 tons (rounded up to nearest 0.1 ton)

Total DERCs used = 2,277.9 tons + 227.8 tons = 2,505.7 tons

**Conclusion**

NRG has submitted all required documentation for the use of NO<sub>x</sub> DERCs to be in compliance with §101.376. Based on data that NRG reported, it is calculated that 2,505.7 tons of NO<sub>x</sub> DERCs (including the 10% environmental contribution of 227.8 tons) were needed for excess emission from the two boilers at the Limestone Electric Generating Station during the period of January 1, 2014 to December 31, 2014. Certificates D-3084, D-3085, D-3086, D-3082 have been cancelled, and the remaining 2,756.9 tons are available to NRG on certificate D-3199 for Intent to Use project 410320.

Marie Mercado 9/30/15

Project Manager

Date

Angela H. Jones 9/30/2015

Peer Reviewer

Date

Dani Tatten 10/7/15

Work Lead

Date



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

Received

MM

409859

MAR - 4 2015

<b>I. COMPANY IDENTIFYING INFORMATION</b>		
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): RN100542927 ✓		
E. TCEQ Air Account Number: (if applicable) LI-0027-L ✓		
F. Primary SIC: 4911	Air Permit Number: O-00075/8576	
<b>II. TECHNICAL CONTACT IDENTIFYING INFORMATION</b>		
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
<b>III. COMPANY CONTACT IDENTIFYING INFORMATION</b>		
A. Company Contact Name: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> 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@nrg.com
<b>IV. Mass Emission Cap and Trade Program (MECT)</b>		
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		
<b>V. Use Period</b>		
Use Start Date: 01/ 01/ 2014		
Use End Date: 12/ 31/ 2014		

DERC  
Intens: 408481, 409297,  
409467



**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	60,385,491.0 MMBtu	0.207 lb/MMBtu	6,309.7		0.165 lb/MMBtu	5,081.5	1,228.2
LMS2	2	NOx	56,275,691.0 MMBtu	0.208 lb/MMBtu	5,881.2		0.165 lb/MMBtu	4,831.5	1,049.7
								<b>Total:</b>	<b>2,277.9</b>





**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 (see attached)**

Continue to Section VII (next page)



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 <sub>x</sub> : <u>2,277.9</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : <u>227.8</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
<b>Total DERCS Used</b>	CO: _____	NO <sub>x</sub> : <u>2,505.7</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	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-3084, D-3085, D-3086, and D-3082. (Please use certificates D-3084, D-3085, D-3086, and D-3082 in the order listed, and release the remaining balance from D-3082.)

*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: 2 March 2015

Title Sr. Manager, Environmental Business

**NRG Texas Power LLC**  
**Limestone Electric Generating Station**  
**DERC Usage Calculations for January 1, 2014 - December 31, 2014**  
**Based on 2014 CEMS NOx Cumulative Report**

TCEQ Account	Unit	NOx Control Method <sup>1</sup>	NOx Monitoring Method	Jan 1, 2014 through Dec. 31, 2014 Heat Input (MMBtu)	Jan 1, 2014 through Dec. 31, 2014 Emission Factor <sup>2</sup> (NOx lb/MMBtu)	Emission Specification (RER) 117.3010(1)(A)(II)	Actual Emissions (ATE) (NOx tons/yr)	Annual Average Emissions Cap (RTE) (NOx tons/yr)	Credits Used to Meet Compliance (NOx lbs/yr) <sup>3</sup>	Credits Used to Meet Compliance (NOx tns/yr) <sup>3</sup>	10% Environmental Contribution	Total DERCs Required
LI-0027-L	LMS 1	Comb, LNB, OFA	CEMS	60,385,491.0	0.207	0.165	6,309.7	5,081.5	2,536,190.6	1,228.2	122.8	1,351.0
LI-0027-L	LMS 2	Comb, LNB, OFA	CEMS	56,275,691.0	0.208	0.165	5,881.2	4,831.5	2,419,854.7	1,049.7	105.0	1,154.7
<b>Total:</b>				<b>116,661,182.0</b>			<b>12,190.9</b>	<b>9,913.0</b>	<b>4,956,045.3</b>	<b>2,277.9</b>	<b>227.8</b>	<b>2,505.7</b>

**Note 1 - NOx Control Method Code**  
Comb - Combustion Tuning  
LNB - Low NOx Burners  
OFA - Over-fire Air

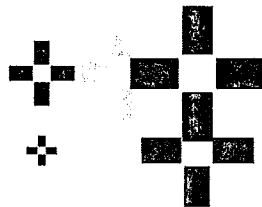
**Note 3 - Formula for discrete credits used:**  
(ATE) - (RTE) = discrete emission credits used

Where:  
ATE = actual total emissions (tons)  
RTE = regulated total emissions (tons)

**Note 2 - Emission Factor**  
Heat Input weighted Emission Factor derived from CEMS data

**2014 Yearly NOx Emissions  
CEMS 2014 Cumulative Report**

<b>Month</b>	<b>LMS1</b>			<b>LMS2</b>		
	<b>Heat Input (mmBtu/mo.)</b>	<b>NOx (tons)</b>	<b>NOx Rate (lb/mmBtu)</b>	<b>Heat Input (mmBtu/mo.)</b>	<b>NOx (tons)</b>	<b>NOx Rate (lb/mmBtu)</b>
January	5,757,656	625.3	0.217	5,325,219	526.1	0.196
February	5,123,570	560.3	0.219	4,964,403	506.9	0.196
March	5,626,368	619.9	0.221	1,705,942	171.2	0.201
April	5,825,427	638.8	0.219	1,543,896	141.4	0.168
May	5,579,309	578.7	0.207	6,051,356	632.4	0.209
June	5,486,098	593.1	0.217	5,428,952	583.9	0.211
July	4,711,218	506.7	0.215	5,345,375	552.5	0.208
August	5,280,836	511.4	0.193	3,147,746	330.8	0.203
September	4,343,029	438.0	0.197	5,771,183	646.4	0.225
October	5,401,257	522.9	0.195	5,665,104	595.1	0.213
November	5,147,138	506.4	0.198	5,682,279	582.5	0.206
December	2,103,585	208.2	0.179	5,644,236	612.0	0.219
<b>Totals</b>	<b>60,385,491</b>	<b>6,309.7</b>	<b>0.207</b>	<b>56,275,691</b>	<b>5,881.2</b>	<b>0.208</b>



**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

March 2, 2015

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 filed a notice of intent to use DERCs to comply with the emission requirements of this plan on November 14, 2013. In addition, NRG Texas submitted a supplemental Notice of Intent filing on June 13, 2014. The DERC distribution and use for the period of January 1, 2014 to December 31, 2014 is summarized in the following table.

DERC DISTRIBUTION	AMOUNT (tons)
Intended for Use (1/1/2014 - 12/31/2014)	5,262.6
Actual Use in 2014	2,277.9
10% Environmental Contribution	227.8
Total DERCs Used	2,505.7
Excess Credits Remaining	2,756.9

If you have any questions or require additional information, please do not hesitate to contact Liz Kashi at (832) 357-5292 or [liz.kashi@nrg.com](mailto:liz.kashi@nrg.com).

Sincerely,

Craig R. Eckberg  
Sr. Manager, Environmental Business

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

ncopost

03/02/2015

US POSTAGE

\$07.19<sup>00</sup>



ZIP 77002  
041L11250335



7012 3050 0000 9639 5165

RECEIVED

MAR 04 2015

TCEQ MAIL CENTER  
AJ

TCEQ  
P.O. Box 13087 MC-206  
Austin, TX 78711-3087  
Attn: Ms. Lindley Anderson

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*

October 9, 2015

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 4, 2014 regarding the use of nitrogen oxides (NO<sub>x</sub>) discrete emission reduction credits (DERC) for the purpose of compliance with 30 Texas Administrative Code (TAC) §117.3020 for the period of January 1, 2014 through December 31, 2014 at the Limestone Electric Generating Station.

We have reviewed your application and agree that the use of 2,277.9 tons of NO<sub>x</sub> DERCs (including the 10% environmental contribution of 227.8 tons) meets the requirements of 30 TAC §101.376 for compliance with §117.3020. These emission credits have been used from certificates D-3084, D-3085, D-3086, and D-3082, which are now cancelled. The remaining 2,756.9 tons of NO<sub>x</sub> DERCs from certificate D-3082 will be retained on certificate D-3199. The emission credits from certificate D-3199 in the amount of 2,756.9 has been deposited in the Texas Commission on Environmental Quality (TCEQ) Discrete Emission Credit Registry for use by NRG in Intent to Use project 410320. These 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  
Page 2  
October 9, 2015

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/jt

cc: Air Section Manager, Region 9 – Waco

Project Number: 409859



## Banking and Trading Route Slip

AIR QUALITY DIVISION Emissions Banking and Trading Program (EBTP)		
Company Name: <u>NRG Texas Power, LLC</u> <u>Limestone Electric Generating Station</u> <u>RN100542927 (P318)</u>		
Project Number: <u>409859</u>		
Type of Letter Correspondence: <u>DCTR; DCUS</u>		
Letter Document Number(s): <u>25356; 25357</u>		
Certificate Number(s): <u>D-3084; D-3085; D-3086; D-3082; D-3193; D-3199</u>		
Review and Approval	Initial and Date	Comments/Special Instructions
<u>DERIC Patton</u> <u>EBTP, Work Lead</u> <u>EBTP</u>	<u>DP</u> <u>10/7/15</u>	
Author/Creator Review	<u>MM</u> <u>10/01/15</u>	
Peer Review Completed	<u>MM</u> <u>9/30/2015</u>	
Author/Creator	<u>MM</u> <u>9/30/15</u>	
		Copies Made
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		Date
		Mailed
		<u>MM</u>
		Date
Please return <b>Routing Slip</b> and <b>Project Paperwork</b> to Brandon Greulich, MC-206, Ext. 4904		

C  
MM  
10/9/15