AIR DERC_100542927-409859 USE_20150930_Use_D3199

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

PROJECT#: 409859

STATUS: P

DISP CODE:

RECEIVED: 03/04/2015

PROJTYPE: BUSE

ISSUED DT:

SUP-DISP DATE: 9 30 701

STAFF ASSIGNED TO PROJECT:

MERCADO, PE, MARIE

PROJECT NOTES:

ASSOCIATED DERC INTENT PROJECTS: 408487 & 409297 - MR & 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 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 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: L10027L **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

CONTAMINATE: NOX ALLOWANCE 0

DELETED DATE:

EFFECTIVE YEAR:

TONS: 805.20

DOLLARS: 0

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

CONTAMINATE: NOX

DELETED DATE:

EFFECTIVE YEAR:

TONS: 662.40

DOLLARS: 0

ALLOWANCEO

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

http://ida.tceq.texas.gov/ida/index.cfm?fuseaction=bkproject_project_report&proj_num_id...

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_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

TRACKING ACTIVITES

PROJECT SUBMITTED:

03/02/2015 PROJECT HOLD:

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

03/23/2015

PROJECT COMPLETED:

1019115

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_X) 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_X 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_X 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 $\S117.3020$. NRG used NO_X DERCs to cover their excess NO_X emissions above their system cap limit through the use of 2,277.9 tons of NO_X 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_X DERCs were needed, resulting in a total of 2,505.7 tons of NO_X DERCs being used.

Certificate Used	D-3084, D-3085, D-3086, & D-3082 (D-3198 use certificate)
Pollutant	NO _x
	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_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 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 $\S117.3020(c)$. 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= 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

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW Page 3
Project No. 409859

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 2,505.7 tons of NO_X 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.

Project Manager

Date

Peer Reviewer

Date

Work Lead

Dáte



Form DEC-3 (Page 1)

Not of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379) Received



Ι.	COMPANY IDENTIFYING INFORMA	TION			MAK = 4 2013		
A.	Company Name: NRG Texas Power LLC	/		Ar	Quality Division		
	Mailing Address: 1201 Fannin Street						
	City: Houston	State: TX	ζ	Zip Code:77002			
	Telephone: 832-357-5291			Fax	k: 832-584-2111		
В.	TCEQ Customer Number (CN): 60320721	8 🗸					
C.	C. Site Name: Limestone Electric Generating Station						
	Street Address (If no street address, give driving directions to site): 3964 FM 39 P3185						
	Nearest City: Jewett	Zip Co	de: 75846		County: Limestone		
D.	TCEQ Regulated Entity Number (RN): RN	10054292	7 /				
E.	TCEQ Air Account Number: (if applicable) LI-0027-	L /				
F.	Primary SIC: 4911			Air Permit Nu	ımber:O-00075/8576		
П.	TECHNICAL CONTACT IDENTIFYI	NG INFO	RMATION		en de la companya de La companya de la co		
A.	Technical Contact Name: (Mr. 🖂	Mrs.	Ms.	Dr.): Liz Kash	ni i		
	Technical Contact Title: Environmental Sp	ecialist					
	Mailing Address: 1201 Fannin Street						
	City: Houston		State: TX		Zip Code: 77002		
	Telephone: 832-357-5292 Fa	ax: 832-584	1-2114	E-mail: liz.kashi@nrg.com			
П	. COMPANY CONTACT IDENTIFYING	G INFOR	MATION	 			
	Company Contact Name: (Mr.	Mrs.		r.): Craig R. Ec	kberg		
-	Company Contact Title: Sr. Manager, Env	ironmental	Business				
	Mailing Address: 1201 Fannin Street						
	City: Houston		State: TX		Zip Code:77002		
	Telephone: 832-357-5291 Fax	: 832-584-2	2111	E-mail: cra	aig.eckberg@nrg.com		
IV	. Mass Emission Cap and Trade Progran	ı (MECT)	- A.	j Parago y			
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? Yes No							
Y	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							
U	se Start Date: 01/ 01/2014		Use	End Date: <u>12/</u>			
1							



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

	1,01,24		Calculation of DERCs							
Emission Point No.	FIN	Air Contaminant	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	
	· · · · · · · · · · · · · · · · · · ·									
			· · · · · · · · · · · · · · · · · · ·							
		lander en	- 10 - 15 - 15 - 15 - 15 - 15 - 15 - 15	- W		e primaria de la composição de la compos		Total:	2,277.9	



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: <u>0.165 lb/mmBtu</u>							
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							
Note. Attuch the actual calculations that were used to determine the	umounts of DLRes 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 _x : <u>2,277.9</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>227.8</u>	PM ₁₀ :	SO ₂ :	VOC:		
Total DERCs Used	CO:	NO _x : <u>2,505.7</u>	PM ₁₀ :	SO ₂ :	VOC:		
XI. DERC INFORMAT	ION	1, 4, 5, 5, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	<u> </u>				
DERC Generator Regulated Certificate number of the certificates D-3084, D-308	Name of the DERC Generator: <u>Limestone Electric Generating Station</u> DERC Generator Regulated Entity Number: <u>RN100542927</u> Certificate number of the DERCs acquired or to be acquired: <u>D-3084, D-3085, D-3086, and D-3082.</u> (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 RESPONSIE	BLE OFFICIAL		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
I, <u>Craig R. Eckberg</u> , 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.21 Date: Zwarch Zo15 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							
14 through			Annual Average	[

				Jan 1, 2014	Jan 1, 2014 through			Annual Average				
	İ		NOx	through Dec. 31,	Dec. 31, 2014	Emission	Actual Emissions	Emissions Cap	Credits Used to Meet	Credits Used to	10%	Total
TCEQ		NOx Control	Monitoring	2014 Heat Input	Emission Factor ²	Specification (RER)	(ATE)	(RTE)	Compliance	Meet Compliance	Environmental	DERCs
Account	Unit	Method ¹	Method	(MMBtu)	(NOx lb/MMBtu)	117.3010(1)(A)(ii)	(NOx tons/yr)	(NOx tons/yr)	(NOx lbs/yr) ³	(NOx tns/yr) ³	Contribution	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
Total:				116,661,182.0			12,190.9	9,913.0	4,956,045.3	2,277.9	227.8	2,505.7

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:

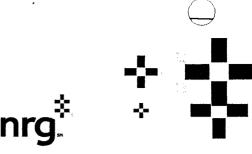
ATE = actual total emissions (tons) RTE = regulated total emissions (tons)

Note 2 - Emission Factor

Heat Input weighted Emission Factor derived from CEMS data

2014 Yearly NOx Emissions CEMS 2014 Cumulative Report

]		LMS1			LMS2	
Heat Input NOx		NOx Rate	Heat Input	NOx	NOx Rate	
Month	(mmBtu/mo.)	(tons)	(lb/mmBtu)	(mmBtu/mo.)	(tons)	(lb/mmBtu)
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
Totals	60,385,491	6,309.7	0.207	56,275,691	5,881.2	0.208



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.

Craig R. Eckberg

Sr. Manager, Environmental Business

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



7012 3050 0000 9639 5165

RECEIVED

MAR U 4 2015 TCEQ MAIL CENTER AJ

TCEQ P.O. Box 13087 MC-206 Austin, TX 78711-3087 Attn: Ms. Lindley Anderson neopost **03/02/2015 USIZOSY**AE

\$07.199



ZIP 77002 041L11250035 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 $_{\rm X}$) discrete emission reduction credits (DERC) for the purpose of compliance with 30 Texas Administrative Code (TAC) §117.3020 for the period of January 1, 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_X 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_X 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,

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: NRG Texas Power LLC, Station RN 10054292-								
Project Number: 409859								
Type of Letter Correspondence:	CTR; DC	us						
Letter Document Number(s):	356; 25	5357						
Certificate Number(s): D-3084)	D-3085,D-308	86) D-3082; D-3199; D-3199						
Review and Approval	Initial and Date	Comments/Special Instructions						
DERIC Patter TBD, Work Lead EBTP	24 johls							
Author/Creator Review	MM 10101115							
Peer Review Completed	9/20/2015							
Author/Creator	MM	Copies Made Date MM Date Mailed Date						
Please return Routing Slip and	9 30 15 Project Paperwork	to Brandon Greulich, MC-206, Ext. 4904						

Can alls