

AIR DERC\_100542927-404537\_  
USE\_20100415\_Use\_D2523

**04/22/2010 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 404537      STATUS: C      DISP CODE: \_\_\_\_\_  
RECEIVED: 03/15/2010      PROJTYPE: BUSE      ISSUED DT: 04/15/2010  
SUP-DISP DATE: 04/15/2010

**STAFF ASSIGNED TO PROJECT:**

BANDA, DANIEL

---

**PROJECT TRANSACTIONS****COMPANY DATA**

COMPANY NAME: NRG TEXAS POWER LLC

CUSTOMER REGISTRY ID: CN603207218

**PORTFOLIO DATA**

NUMBER: P3185 NAME: 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

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2010-03-31 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 1894.60

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D2523 COUNTY : LIMESTONE

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2010-03-31 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 832.80

DOLLARS: 0

ALLOWANCE

CERTIFICATE NO.: D2524 COUNTY : LIMESTONE

---

**TRACKING ACTIVITIES**

TR - ENGINEER RECEIVE PROJECT : 03/31/2010

TR - SUP/MANGR APP/RVW RQSTD :

04/15/2010 FA - PROJECT ISSUED : 04/15/2010

TR - PROJ TECH COMPLETE : 04/15/2010

**03/31/2010 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 404537      STATUS: P      DISP CODE: \_\_\_\_\_  
RECEIVED: 03/15/2010      PROJTYPE: BUSE      ISSUED DT: \_\_\_\_\_  
SUP-DISP DATE: \_\_\_\_\_

**STAFF ASSIGNED TO PROJECT:**

BANDA, DANIEL

---

**PROJECT TRANSACTIONS****COMPANY DATA**

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

**PORTFOLIO DATA**

NUMBER: P3185 NAME: 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

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2010-03-31 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE

DELETED DATE:

EFFECTIVE YEAR:

TONS: 0

DOLLARS: 0

CERTIFICATE NO.: 0 COUNTY : LIMESTONE

*USE 09'**1894.6**1894.6*

---

**TRACKING ACTIVITES**

TR - ENGINEER RECEIVE PROJECT : 03/31/2010

TR - SUP/MANGR  
APP/RVW RQSTD :

TR - PROJ TECH  
COMPLETE :

FA - PROJECT ISSUED :

TR - DATE SUP/MNGR  
REQ ADDL TR :



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

**RECEIVED**  
**MAR 15 2010**  
**AIR QUALITY**  
**DIVISION**

<b>I. Company Identifying Information</b>			
A. Company Name: <b>NRG Texas Power LLC</b>			
Mailing Address: <b>1301 McKinney, Suite 2300</b>			
City: <b>Houston</b>	State: <b>TX</b>	Zip Code: <b>77010</b>	
Telephone: <b>713-795-6208</b>		Fax: <b>713-795-7431</b>	
B. TCEQ Customer Number (CN): <b>CN603207218</b>			
C. Site Name: <b>Limestone Electric Generating Station</b>			
Street Address: (if no street address, give driving directions to site) <b>9 miles North of Jewett, TX on FM 39</b>			
Nearest City: <b>Jewett</b>	Zip Code: <b>75846</b>	County: <b>Limestone</b>	
D. TCEQ Regulated Entity Number (RN): <b>RN100542927</b>			
E. TCEQ Account Number: (if applicable) <b>LI-0027-L</b>			
F. Primary SIC: <b>4911</b>		Air Permit Number: <b>O-00075/PSD-TX-371M4</b>	
<b>II. Technical Contact Identifying Information</b>			
A. Technical Contact Name: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) <b>Perry M. Galloway</b>			
Technical Contact Title: <b>Sr. Environmental Specialist</b>			
Mailing Address: <b>1301 McKinney, Suite 2300</b>			
City: <b>Houston</b>	State: <b>TX</b>	Zip Code: <b>77010</b>	
Telephone: <b>713-795-6211</b>	Fax: <b>713-795-7431</b>	E-mail: <b>perry.galloway@nrgenergy.com</b>	
<b>III. 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 _____			
<i>Note: If DERC use is to comply with MECT then go to Section IX</i>			
<b>IV. Use Period</b>			
Use Start Date: <b>01/01/2009</b>		Use End Date: <b>12/31/2009</b>	
<b>V. State and Federal Requirements</b>			
Applicable State and Federal requirements that the DERCs were used for compliance: <b>30 TAC 117, 30 TAC 376</b>			
<b>VI. Most Stringent Emission Rate</b>			
Describe basis for most stringent allowable emission rate: <input type="checkbox"/> Permit _____ <input type="checkbox"/> RACT _____ <input checked="" type="checkbox"/> Other: <b>0.165 lb/mmBtu</b>			
Notes:			





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

RECEIVED  
MAR 15 2010  
AIR QUALITY  
DIVISION

**VIII. Protocol**

Protocol used to calculate DERC: CEMS Data (see attached)

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

**IX. Total DERCs Used (round up to the nearest tenth of a ton)**

Tons of DERCs required (from Sect. VI.)	CO: _____	NO <sub>x</sub> : 1735.4	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> : 173.5	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Total DERCs Used	CO: _____	NO <sub>x</sub> : 1908.9	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____

**X. DERC Information**

Name of the DERC Generator: Limestone Electric Generating Station; W. A. Parish Electric Generating Station; T. H. Wharton Electric Generating Station

DERC Generator Regulated Entity Number: RN100888312

Certificate number of the DERCs used: D-1026

Note: The certificate number is assigned by the TCEQ

**XI. Purchase Dates and Prices**

Date on which the DERCs were acquired or registered: 5/28/2003

Price of the DERCs: \$ 0.0 per ton (Required)

**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. 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 Signature Date 11 Mar 10

Title Manager, Air Resources

RECEIVED

MAR 15 2010

AIR QUALITY  
DIVISION

2009 Yearly NOx Emissions  
CEMS 2009 Cumulative Report

Month 2008	LMS1			LMS2		
	Heat Input (mmBtu/mo.)	NOx (tons)	NOx Rate (lb/mmBtu)	Heat Input (mmBtu/mo.)	NOx (tons)	NOx Rate (lb/mmBtu)
January	5,223,597	476.8	0.181	6,506,025	680.7	0.209
February	1,698,325	157.6	0.186	4,986,087	494.0	0.196
March	2,193,017	197.7	0.165	5,442,395	520.3	0.189
April	4,397,098	405.7	0.185	5,561,763	534.4	0.191
May	5,604,359	556.8	0.197	5,933,348	631.5	0.212
June	5,761,382	642.3	0.222	6,051,927	705.4	0.232
July	5,922,873	639.3	0.215	6,339,234	728.8	0.230
August	4,661,928	473.2	0.201	5,107,581	540.3	0.208
September	3,964,512	338.8	0.169	4,739,122	418.9	0.177
October	5,103,568	422.3	0.165	5,664,431	476.8	0.169
November	4,927,620	437.2	0.178	5,351,021	489.9	0.185
December	5,539,341	505.0	0.182	6,031,888	545.8	0.181
Totals	54,997,618.30	5,252.7	0.1872	67,714,821.40	6,766.8	0.1983

$$(54,997,618.30) \times (0.187 - 0.165) = 605.0$$

2000

$$(67,714,821.40) \times (0.198 - 0.185) = 1117.3$$

2000

$$\begin{array}{r} 1 \\ 1117.3 \\ 605.0 \\ \hline 1722.3 \end{array}$$

$$1722.3 \times 0.1 = 172.3$$

$$1722.3 + 172.3 = 1894.6$$

**NRG Texas Power LLC**  
**Limestone Electric Generating Station**  
**DERC Usage Calculations for January 1, 2009 - December 31, 2009**  
**Based on 2009 CEMS NOx Cumulative Report (1/1/09 - 12/31/09)**

TCEQ Account	Unit	NOx Control Method <sup>1</sup>	NOx Monitoring Method	Jan 1, 2007 thru December 31, 2007 Heat Input-(ALA) (MMBtu) <sup>2</sup>	Jan 1, 2007 thru December 31, 2007 EF-(AER) (NOx lb/MMBtu)	Emission Specification (RER) 117.135(1)(ii)	Actual Emissions (NOx tons/yr)	Annual Average Emissions Cap (NOx tons/yr)	Credits Used to meet Compliance (NOx lbs/yr) (101.376(e)(2)(A)) <sup>3</sup>	Credits Used to meet Compliance (NOx tns/yr) (101.376(e)(2)(A)) <sup>3</sup>	10% Environmental Contribution	Total DERCs Required
LI-0027-L	LMS 1	Comb, LNB, OFA	CEMS	54,997,618.3	0.18717	0.165	5,252.7	5,081.5	1,219,113.9	609.6	61.0	670.5
	LMS 2	Comb, LNB, OFA	CEMS	67,714,821.4	0.19825	0.165	6,766.8	4,831.5	2,251,517.8	1,125.8	112.6	1,238.3
<b>Total:</b>				<b>122,712,439.7</b>			<b>12,019.5</b>	<b>9,913.0</b>	<b>3,470,631.7</b>	<b>1,735.3</b>	<b>173.5</b>	<b>1,908.8</b>

Note 1 - NOx Control Method Code

Comb - Combustion Tuning

LNB - Low NOx Burners

OFA - Over-fire Air

Note 2 - Emission Factor

Heat Input weighted Emission Factor derived from CEMS data

Note 3 - Formula for discrete credits used is per 30 TAC 101.376(e)(2)(A):

(ALA) X (AER - RER) = discrete emission credits used

Where:

ALA = actual level of activity

AER = actual emission rate per unit activity

RER = regulatory emission rate per unit activity

**RECEIVED**  
**MAR 15 2010**  
**AIR QUALITY**  
**DIVISION**



**RECEIVED**  
MAR 15 2010  
AIR QUALITY  
DIVISION

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

March 12, 2010

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

**SUBJECT: Notice of Use Discrete Emission Reduction Credits  
Limestone Electric Generating Station  
Jewett, Limestone County  
Account #: LI-0027-L  
RN100542927**

Dear Mr. Chism:


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 11, 2008. The DERC distribution and use for the period of January 1, 2009 to December 31, 2009 is summarized in the following table.

DERC DISTRIBUTION	AMOUNT (tons)
Intended for Use (11/11/2008)	2,374
Actual Use in 2009	1,735.4
10% Environmental Contribution	173.5
Total DERCs Used	1,908.9
Excess Credits Remaining	465.1

If you have any questions or require additional information, please do not hesitate to contact Perry Galloway at 713-795-6211 or [perry.galloway@nrgenergy.com](mailto:perry.galloway@nrgenergy.com).

Sincerely,

  
Craig R. Eckberg  
Manager, Air Resources  
Environmental Operations

Enclosure(s): Form DEC-3

cc: Mr. Gary Goldman, TCEQ Region 9, Air Section Manager, Waco, TX



*The State of Texas*

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Certificate Number:

D-2523

Number of Credits:

1894.6 Tons NOx

**USED**

PURPOSE: 117.3010 compliance  
DATE: 5/12/2010

## *Discrete Emission Reduction Credit Certificate*

This certifies that

***NRG Texas Power, L.L.C.,  
1301 McKinney, Suite 2300  
Houston, Texas 77010***

is the owner of 1894.6 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, 1999 to March 31, 2000

Generator Regulated Entity No.: RN100888312

Generator Certificate: D-1026

County of Generation: Fort Bend

May 4, 2010

Date

*David Bryner*

For the Commission

*The State of Texas*

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Certificate Number:

D-2524



Number of Credits:

832.8 Tons NOx

## *Discrete Emission Reduction Credit Certificate*

This certifies that

***NRG Texas Power, L.L.C..  
1301 McKinney, Suite 2300  
Houston, Texas 77010***

is the owner of 832.8 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, 1999 to March 31, 2000

Generator Regulated Entity No.: RN100888312

Generator Certificate: D-1026

County of Generation: Fort Bend

May 4, 2010

Date

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

For the Commission