



**SITE DATA**

ACCOUNT: HG1434S  
REG ENTITY ID: RN102342813  
SITE NAME: CRAY VALLEY WALLISVILLE ROAD  
COUNTY: HARRIS  
NEAREST CITY: HOUSTON  
LOCATION: 17335 WALLISVILLE RD HOUSTON, TX 77049-5021

**CONTACT DATA**

NAME: PHIL CARRUTHERS  
TITLE: VICE PRESIDENT HSSE & IS  
ROLE: AAR  
STREET: 1201 LOUISIANA STREET, SUITE 1800  
CITY/STATE, ZIP: HOUSTON, TX , 77002-  
PHONE: 713-483-5000 -  
EMAIL: PHIL.CARRUTHERS@TOTAL.COM

**TRANSACTION DATA**

TRANSACTION TYPE: ERC\_RET  
DATE ENTERED: 2018-05-29 00:00:00.0  
DELETED DATE: EFFECTIVE YEAR:  
CONTAMINATE: **NOX**  
TONS: **0.20** DOLLARS: **0**  
ALLOWANCE **0** CERTIFICATE NO.: **3158** COUNTY : **HARRIS**

**COMPANY DATA**

COMPANY NAME: TOTAL PETROCHEMICALS & REFINING USA INC  
CUSTOMER REGISTRY ID: CN604041020

**PORTFOLIO DATA**

NUMBER: P3706 NAME: TOTAL PETRO REFIN USA - CRAY VALLEY - RN102342813

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**TRANSACTION DATA**

TRANSACTION TYPE: ERC\_RET  
DATE ENTERED: 2018-05-29 00:00:00.0  
DELETED DATE: EFFECTIVE YEAR:  
CONTAMINATE: **VOC**  
TONS: **4.50** DOLLARS: **0**  
ALLOWANCE **0** CERTIFICATE NO.: **3159** COUNTY : **HARRIS**

**TRACKING ACTIVITIES**

PROJECT SUBMITTED :	05/22/2018	PM RECEIVED DATE :	05/25/2018
PEER REVIEW :	05/29/2018	05/29/2018	
TEAM LEAD REVIEW :	06/04/2018	06/12/2018	
SECTION MANAGER REVIEW :	06/15/2018	06/15/2018	PROJECT COMPLETED : 06/19/2018

## Emission Reduction Credit (ERC) Creditability Technical Review

Project Number:	413216	Project Manager:	Matthew Hager
Customer Reference No.:	NA	Company Name:	Amerex Brokers LLC
Regulated Entity Reference No.:	NA	Site Name:	NA
Portfolio Number:	P3493	County:	NA

### Project Overview

Amerex Brokers LLC submitted a Creditability Review of Emissions Credits application on 5/22/2018 for the review of ERC certificate number(s) 3158 and 3159.

### ERC Creditability

#### Certificate 3158

ERC Certificate 3158 was generated by Total Petrochemicals & Refining USA Inc for the shutdown of the Cray Valley Wallisville Road site (RN102342813), located in Harris County. The generator project number is 409527. The certificate is valued at 0.2 tpy of NO<sub>x</sub> and expires 7/13/2020.

Certificate 3158 has not previously been re-reviewed.

Table 1 below lists the regulations that were evaluated in this project. There have been no new regulatory provisions that would have affected the facilities since project 409527 and the submission of this creditability review project. Therefore, certificate number 3158 still retains the certified amount of 0.2 tpy NO<sub>x</sub>.

**Table 1: Regulatory Review**

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
HTR-1	30 TAC §117.2010(c)(1)(A)	This rule was not listed in the generation project, however the rule has not changed since the certificate was issued.	6/14/2007
HTR-1	30 TAC §101.351(a)(2)	Site not subject to MECT because heater does not have an uncontrolled design capacity to emit ≥10 tpy.	6/25/2015
FU1, FU2	40 CFR Part 60 Subpart VVa	Not Applicable: Constructed/modified before 11/7/2006	6/2/2008
All	40 CFR Part 60 Subpart III	Not Applicable: Not air oxidation process	12/4/2000
All	40 CFR Part 60 Subpart NNN	Not Applicable: Not distillation process	2/27/2014
All	40 CFR Part 63 Subpart F	Not Applicable: Site does not manufacture any chemical listed in Table 1 of Subpart F	4/20/2006
SCRUBCOLL	40 CFR Part 63 Subpart G	Not applicable: Not subject to Subpart F	2/27/2014

### Certificate 3159

ERC Certificate 3159 was generated by Total Petrochemicals & Refining USA Inc for the shutdown of the Cray Valley Wallisville Road site (RN102342813), located in Harris County. The generator project number is 409527. The certificate is valued at 4.5 tpy of VOC, and expires 7/31/2020.

Certificate 3159 has not previously been re-reviewed.

Table 2 below lists the regulations that were evaluated in this project. There have been no new regulatory provisions that would have affected the facilities since project 409527 and the submission of this creditability review project. Therefore, certificate number 3159 still retains the certified amount of 4.5 tpy VOC.

**Table 2: Regulatory Review**

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
SCRUBCOLL	30 TAC §115.121(a)(2)(A)	This regulation has not changed since the ERCs were issued.	6/25/2015
SCRUBCOLL	30 TAC §115.122(a)(1)(B)	This regulation has not changed since the ERCs were issued.	6/25/2015
HTR-1, SCRUBCOLL	30 TAC §101.391(a)	Not applicable: No HRVOCs used	6/25/2015
HTR-1, SCRUBCOLL	30 TAC §115.720(a)	Not applicable: No HRVOCs used	12/23/2004
FU1, FU2	30 TAC §115.780(a)	Not applicable: No HRVOCs used	12/23/2004
FU1, FU2	40 CFR Part 60 Subpart VVa	Not applicable: Constructed/modified before 11/7/2006	6/2/2008
All	40 CFR Part 60 Subpart III	Not applicable: Not air oxidation process	12/4/2000
All	40 CFR Part 60 Subpart NNN	Not applicable: Not distillation process	2/27/2014
All	40 CFR Part 63 Subpart F	Not applicable: Side does not manufacture any chemical listed in Table 1 of Subpart F	4/20/2006
SCRUBCOLL	40 CFR Part 63 Subpart G	Not applicable: Not subject to Subpart F	2/27/2014
FU1, FU2	40 CFR §§60.482-1, -2, -6, and -7	This regulation has not changed since the ERCs were issued.	11/16/2011
SCRUBCOLL	40 CFR §60.702(b)	This regulation has not changed since the ERCs were issued.	8/31/1993

### Conclusion

From this review it has been determined that, as of June 19, 2018, the ERCs on certificates 3158 and 3159 have not devalued.



413216

Received *MH*  
MAY 24 2018

**Texas Commission on Environmental Quality**  
**Form EC-2**  
**Creditability Review for Emission Credits**  
(Title 30 Texas Administrative Code § 101.300 - § 101.304) **Air Quality Division**

<b>I. REQUESTOR INFORMATION</b>					
A. Company Name: Amerex Brokers, LLC					
Mailing Address: 1 Sugar Creek Center Blvd # 700					
City: Sugar Land		State: TX		Zip Code: 77478	
B. Contact Name: David DeVooght					
Telephone: 281-340-8010		Fax: 281-340-5266			
<b>II. EMISSION CREDIT OWNER INFORMATION</b>					
A. Company Name: TOTAL PETROCHEMICALS & REFINING USA INC					P3493
B. Nonattainment area: HGB					
C. Contact Name: Jeff Baker					
Telephone: 409-291-7290			Fax:		
<b>III. EMISSION CREDIT CERTIFICATES TO BE REVIEWED</b>					
Certificate No.:	3158	Exp. Date:	7/13/2020	TPY VOC:	TPY NO <sub>x</sub> : 0.2
Certificate No.:	3159	Exp. Date:	7/13/2020	TPY VOC: 4.50	TPY NO <sub>x</sub> :
Certificate No.:		Exp. Date:		TPY VOC:	TPY NO <sub>x</sub> :
Certificate No.:		Exp. Date:		TPY VOC:	TPY NO <sub>x</sub> :
<b>IV. EMISSION RATE RULE AND REGULATION CHANGES</b>					
List any state or federal rules and regulations that have changed since these ERCs were last reviewed which could affect the creditability of the reduction:					
<b>V. SIGNATURE</b>					
I, <u>David DeVooght</u> , hereby certify that the information entered in this application is correct to the best of my knowledge and belief and understand that the emission reduction credits listed above may devalue upon review of their creditability per 30 TAC Chapter 101, Subchapter H, Division 1.					
Signature <u>David DeVooght</u>			Signature Date <u>5/21/18</u>		
Title <u>Analyst</u>					

*Mail application to:*  
Texas Commission on Environmental Quality  
Emission Banking and Trading Program MC 206  
PO BOX 13087  
AUSTIN, TX 78711-3087

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Stephanie Bergeron Perdue, *Interim Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 19, 2018

Amalia Berrios  
VP/Sr. Counsel  
Amerex Brokers LLC  
1 Sugar Creek Center Boulevard, Suite 700  
Sugar Land, Texas 77478  
Via email: aberrios@amerexenergy.com

Re: ERC Creditability Review  
ERC Certificate(s): 3158, 3159  
Project Number: 413216

Dear Amalia Berrios:

This letter is in response to the Application for Creditability Review of Emission Credits submitted on May 22, 2018 requesting review of the NO<sub>x</sub> and VOC emission reduction credits (ERCs) in certificate(s) 3158 and 3159. The ERCs in certificate(s) 3158 and 3159 were certified by Total Petrochemicals & Refining USA Inc in project 409527 from the shutdown at the Cray Valley Wallisville Road site.

The Texas Commission on Environmental Quality (TCEQ) has determined that as of June 19, 2018 there have been no regulatory changes that decrease the certified amount of ERCs available in certificate(s) 3158 and 3159. Changes to the representations made in the original ERC application or future regulatory actions could affect the amount of credits available for use in the certificate.

Pollutant	Certificate	Amount (tpy)	Retained Certificate	Amount Retained (tpy)
NO <sub>x</sub>	3158	0.2	3158	0.2
VOC	3159	4.5	3159	4.5

Additional information regarding this project and the site's portfolio is available online at [http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt\\_dpa.start](http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start). If you have questions concerning this project or the EBT program, please contact Matthew Hager at 512-239-6057 or [Matthew.Hager@tceq.texas.gov](mailto:Matthew.Hager@tceq.texas.gov), or write to the TCEQ, Office of Air, Air Quality Division, MC-206, P.O. Box 13087, Austin, Texas 78711-3087.

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

Sincerely,

A handwritten signature in black ink that reads "David Brymer".

David Brymer, Director  
Air Quality Division

cc: Kelly Covington, Emissions Broker/Consultant, Amerex Brokers LLC