

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 28, 2021

Amalia Berrios
Vice President/Senior Counsel
Amerex Brokers LLC
1 Sugar Creek Center Boulevard, Suite 700
Sugar Land, Texas 77478
Via email

Subject: ERC Creditability Review
ERC Certificate(s): 3399, 3400, 3432, 3448, 3449, and 3512
Project Number: 416258

Dear Amalia Berrios:

This letter is in response to the Application for Creditability Review of Emission Credits submitted on March 31, 2021 requesting review of the volatile organic compounds (VOC) emission reduction credits (ERCs) in certificates 3399, 3400, 3432, 3448, 3449, and 3512.

The Texas Commission on Environmental Quality (TCEQ) has determined that as of April 28, 2021 there have been no regulatory changes that decrease the certified amount of ERCs available in these certificates. 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 certificates.

Certificate	Pollutant	Amount (tpy)	Retained Certificate	Amount Retained (tpy)
3399	VOC	0.1	3399	0.1
3400	VOC	5.0	3400	5.0
3432	VOC	0.7	3432	0.7
3448	VOC	4.2	3448	4.2
3449	VOC	3.0	3449	3.0
3512	VOC	10.4	3512	10.4

Additional information regarding this project and the site's portfolio is available online at https://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start. If you have questions concerning this project or the EBT program, please contact Marie Mercado, P.E., at Marie.Mercado@tceq.texas.gov, or write to the TCEQ, Office of Air, Air Permits Division, MC-163, 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, appearing to read "Samuel Short", followed by a long horizontal line.

Samuel Short, Deputy Director
Air Permits Division

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

Emission Reduction Credit (ERC) Creditability Technical Review

Project Number:	416258	Project Manager:	Marie Mercado, P.E.
Broker Account No.:	BKR1046	Company Name:	Amerex Brokers LLC
Regulated Entity Reference No.:	NA	Site Name:	Broker Account - Amerex Brokers LLC
Portfolio Number:	P3493	County:	NA

Project Overview

Amerex Brokers LLC submitted a Creditability Review of Emissions Credits application on 03/31/2021 for the review of volatile organic compound (VOC) ERC certificates 3399, 3400, 3432, 3448, 3449, and 3512.

ERC Creditability

Certificates 3399 and 3400: 0.1 and 5.0 tpy, respectively

E.I. DuPont generated VOC ERCs by the permanent shutdown of the Herbicide Business Unit. A total of 0.1 and 5.0 tpy of VOC ERCs were generated in certificates 3230 and 3231, respectively, from a Velpar flare, facility identification number (FIN)/emission point number (EPN) VP-01AC/VP-01A, and liquid toluene equipment leak fugitives, FIN/EPN VP-05F/VP-05F, at the E.I. DuPont De Nemours La Porte Plant, RN100225085, in ERC generation project 411369. The original certificates, 3230 and 3231, have each been traded three times, resulting in certificates 3399 and 3400, respectively. Certificates 3399 and 3400 will expire on 08/31/2021 and 09/26/2021, respectively.

A previous re-review of VOC certificates 3230 and 3231 issued from project 411369 was completed on 06/20/2018 (ERC Re-Review project 413244).

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 413244 and the submission of this creditability review project. Therefore, certificates 3399 and 3400 still retains the certified amounts of 0.1 and 5.0 tpy, respectively, and the full amount is available.

Table 1: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All FINs/All EPNs	New Source Review (NSR) Permit 2446A	Established a VOC limit for each EPN. Permit voided in Permit project 258087.	09/09/2016
All FINs/All EPNs	Title V Federal Operating Permit (FOP) O1905	Authorized the site to operate. Permit voided in Permit project 25608.	03/06/2017
VP-01AC/VP-01A	40 Code of Federal Regulation (CFR) Part 63 Subpart A §63.11(b)(1) - (6)	Complied with the opacity, net heating value and velocity specifications in 40 CFR 63 Subpart A as required by the applicable Maximum Achievable Control Technology (MACT).	12/22/2008
VP-01AC/VP-01A	40 CFR 63 Subpart MMM (MACT) §63.1363(a) - (h)	Complied with the monitoring requirements specified in 40 CFR 63 Subpart MMM for Velpart process equipment in Hazardous Air Pollutant (HAP) Service.	03/27/2014

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
VP-05F/VP-05F	40 CFR Part 63 Subpart EEEE §63.2346(c) §63.2396(e)(2)	Complied with the monitoring requirements specified in 40 CFR 63 Subpart EEEE for organic loading rack equipment in HAP Service.	07/07/2020
VP-05F/VP-05F	40 CFR Part 63 Subpart FFFF §63.2480(a) - (d)	Complied with the monitoring requirements specified in 40 CFR 63 Subpart FFFF for Sodium Methylate (NaOMe) process equipment in HAP Service.	08/12/2020

Certificates 3432 and 3449: 0.7 and 3.0 tpy VOC, respectively

Rodeo Resources, LLC, generated VOC ERCs by the permanent shutdown of the Cinco Ranch 190 Production Facility 1 site, RN102842473 in ERC Generation Project 410403. Both certificate can be traced back to original generator certificate 3207 (3.7 tpy). The credits were generated from the permanent shutdown of two 220-barrel tanks' tank loading losses, FIN/EPN Group-EPN5/Group-EPN5, and associated separation and metering equipment and related fugitives, FIN/EPN EPN7/EPN7. Certificate 3207 has each been traded five times, resulting in certificates 3432 and 3449. Certificates 3432 and 3449 will expire on 11/02/2021.

A previous re-review of VOC certificate 3207 issued from project 410403 was completed on 02/01/2019 (ERC Re-Review project 413526).

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 413526 and the submission of this creditability review project. Therefore, certificates 3432 and 3449 still retain the certified amounts of 0.7 and 3.0 tpy, respectively, and the full amounts are available.

Table 2: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All FINs/All EPNs	Permit by Rule (PBR) Registration No. 52092	Established a VOC limit for each EPN. Permit cancelled and permit cancellation letter in ERC Generation project file.	12/05/2014
All FINs/All EPNs	40 CFR Part 60 Subpart OOOO §60.5365	Verified that the applicability dates of commence construction, modification or reconstruction after 08/23/2011, and on or before 09/18/2015 were not been revised.	09/14/2020
All FINs/All EPNs	40 CFR Part 60 Subpart OOOOa §60.5365a	Verified that the applicability date of commence construction, modification or reconstruction after 09/18/2015 was not been revised.	09/15/2020
GROUP-EPN5/ GROUP- EPN5	30 Texas Administrative Code (TAC) Subchapter B Division 1 §115.112(e)(4)	Verified that the control requirement of 1,500 barrels, bbl, (63,000 gallons, gal) per year on a rolling 12-month basis was not decreased.	03/26/2020
GROUP-EPN5/ GROUP- EPN5	30 TAC Subchapter B Division 1 §115.131(a)	Verified that affected facility type of water separator was not modified.	11/20/1995

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
GROUP-EPN5/ GROUP- EPN5	40 CFR Part 60 Subpart Ka §60.110a(a)	Verified that the affected facility's storage capacity of 151,416 liters, ltr, (40,000 gal) was not decreased.	12/14/2000
GROUP-EPN5/ GROUP- EPN5	40 CFR Part 60 Subpart Kb §60.110b(d)(4)	Verified that the affected facility's exemption of less than or equal to design capacity of 1,589.874 cubic meters (m ³) was not been revised.	01/19/2021
GROUP-EPN5/ GROUP- EPN5	40 CFR Part 63 Subpart HH §63.760(b)(1)(ii) §63.761, <i>Storage Vessel</i> §63.766(a)	Verified that the affected facilities still included storage vessel with the potential for flash emissions. Verified that the definition of Storage vessel with the potential for flash emissions was not revised.	§63.760: 11/19/2020 §63.761 & §63.763: 08/16/2012
EPN7/EPN7	40 CFR Part 60 Subpart KKK §60.630(a)(1)	Verified that affected facility location of onshore natural gas processing plant was not modified.	08/16/2012
EPN7/EPN7	40 CFR Part 63 Subpart HH §63.769(a)	Verified that affected facility location of onshore natural gas processing plant was not modified.	08/16/2012

Certificate 3448: 4.2 tpy VOC

Hamman Oil & Refining Company generated VOC ERCs by the permanent shutdown of the Josey Ranch 2 4 & 5 Production Facility, RN102754520. A total of 4.2 tpy of VOC ERCs were generated in certificate 3427 from the permanent shutdown of two 300-barrel crude oil fixed-roof storage tanks, FINs/EPNs TC-1/TC-1 and TC-2/TC-2, three 400-bbl produced water fixed-roof storage tanks, FINs/EPNs TW-1/TW-1, TW-2/TW-2, and TW-3/TW-3, a compressor engine, FIN/EPN COMP/COMP, and fugitive emissions, FIN/EPN FUG/FUG, in ERC generation project 411739. Certificate 3427 has each been traded a couple of times, resulting in certificate 3448. Certificate 3448 will expire on 11/30/2021.

No re-review of this certificate has been completed.

Table 3 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 411739 and the submission of this creditability review project. Therefore, certificate 3448 still retains the certified amount of 4.2 tpy and the full amount is available.

Table 3: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All FINs/All EPNs	PBR Registration No. 108033	Subject to certified emission rates for VOC and NO _x . Permit cancelled and permit cancellation letter in ERC Generation project file.	05/03/2017

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
TC-1/TC-1 TC-2/TC-2 TW-1/TW-1 TW-2/TW-2 TW-3/TW-3	30 TAC Chapter 115 Subchapter B Division 1 §115.112(e)(1) §115.112(e)(4) §115.112(e)(5)(A)	Complied with applicable requirement by using submerged fill pipes. Not subject to this regulation because the storage vessels stored crude oil, not condensate. Not subject to this regulation because the uncontrolled VOC emissions from each individual storage tank or from the aggregate of storage tanks in the tank battery was less than 25 tpy on a rolling 12-month basis.	03/26/2020
TC-1/TC-1 TC-2/TC-2 TW-1/TW-1 TW-2/TW-2 TW-3/TW-3	40 CFR Part 60 Subpart Kb §60.110b(d)(4)	Not subject to this regulation since each storage tank has a capacity less than 1,589.874 m ³ (420,000.3 gal).	01/19/2021
TC-1/TC-1 TC-2/TC-2 TW-1/TW-1 TW-2/TW-2 TW-3/TW-3	40 CFR Part 60 Subpart OOOO §60.5365(e)	Not subject to this regulation since the potential of each storage tank for VOC emissions was less than 6 tpy.	09/14/2020
TC-1/TC-1 TC-2/TC-2 TW-1/TW-1 TW-2/TW-2 TW-3/TW-3	40 CFR Part 60 Subpart OOOOa §60.5365a(a)	Not subject to this regulation because the construction date of the storage vessels was prior to 09/18/2015, the effective date of the regulation.	09/15/2020
TC-1/TC-1 TC-2/TC-2 TW-1/TW-1 TW-2/TW-2 TW-3/TW-3	40 CFR Part 63 Subpart HH §63.760(a)(1) §63.761, <i>Hazardous Air Pollutant & Storage Vessels with the Potential for Flash Emissions</i>	Not subject to this regulation because the site was not a major source of HAPs. Per §63.2, a major source emits or has the potential to emit 10 tpy or more of any HAP or 25 tpy of any combination of HAPs. Also, the storage tanks do not meet the definition of “storage vessels with the potential for flash emissions,” since the annual average hydrocarbon liquid throughput for each vessel was less than 79,500 ltr (500 bbl) per day. Therefore, the regulation does not apply.	§63.760: 11/19/2020 §63.761: 08/16/2012

Certificate 3512: 10.4 tpy VOC

Southcross Gathering Ltd generated VOC ERCs by the permanent shutdown of the Conroe Gas Plant, RN102892965. A total of 10.4 tpy of VOC ERCs were generated in certificate 3109 from the permanent shutdown of plant fugitives, FIN/EPN FUGITIVES/FUGITIVES, amine unit, FIN/EPN AMINE/FLARE2, primary glycol dehydrator, FIN/EPN JJ/FLARE2, atmospheric truck loading, FIN/EPN TRUCKLOAD/TRUCKLOAD, Caterpillar G3608 lean-burn engine, FIN/EPN KK/KK, amine reboiler, FIN/EPN DD/DD, Caterpillar G353 rich-burn engine, FIN/EPN II/(IDLED 12/2015)II, Caterpillar G398NA rich-burn, FIN/EPN GG/(IDLED 12/2015) GG and FF/(IDLED 11/2015)FF, and superior 8G825 rich-burn engine, FINs/EPNs N/N, O/O, P/P, T/T, U/U, V/V, W/W, and X/X, in ERC generation project 411374. Certificate 3427 has each been traded a couple of times, resulting in certificate 3512. Certificate 3512 will expire on 12/31/2021.

No re-review of this certificate has been completed.

Table 4 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 411374 and the submission of this creditability review project. Therefore, certificate 3512 still retains the certified amount of 10.4 tpy and the full amount is available.

Table 4: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All FINs/ All EPNs	PBR 49331	Established a VOC limit for each EPN. Permit cancelled and permit cancellation letter in ERC Generation project file.	03/29/2017
FUGITIVES/ FUGITIVES	30 TAC Chapter 115 Subchapter B Division 2	The site had Leak Detection and Repair (LDAR) program in place, utilizing a leak definition of 10,000 parts per million volume (ppmv) for pumps and compressors and 500 ppmv for all other components. Fugitive emissions reported to the emissions inventory is based on Method 21 monitoring of all fugitive components.	06/25/2015
FUGITIVES/ FUGITIVES	40 CFR Part 60 Subpart KKK §60.630 §60.632	The site had Leak Detection and Repair (LDAR) program in place, utilizing a leak definition of 10,000 parts per million volume (ppmv) for pumps and compressors and 500 ppmv for all other components. Fugitive emissions reported to the emissions inventory is based on Method 21 monitoring of all fugitive components.	§60.630: 08/16/2012 §60.632: 10/17/2000
All Engines/ All Engines	40 CFR Part 60 Subpart JJJJ §60.4230	Establishes applicability. Engines at the site were installed prior to any of the trigger dates and are exempt. This regulation has not changed since the ERCs were issued.	06/28/2011
All Engines/ All Engines	40 CFR Part 63 Subpart ZZZZ §63.6585(c) §63.6603(a)	Owner/operators of existing stationary spark ignition (SI) internal combustion engines (ICE) must comply with the requirements in Table 2d of MACT ZZZZ. Table 2d does not state any emission limitations for the SI ICEs located at this site.	01/30/2013
JJ/JJ	40 CFR Part 63 Subpart HH §63.771	The glycol dehydrator system was controlled by routing flash vessel emissions to the suction side of the compressor engines to be compressed and routed to the sales pipeline. The glycol dehydrator system was also equipped with a JATCO BTEX eliminator which reduced regenerator emissions by 98%.	08/16/2012

Conclusion

As of the submission date of this project, the ERCs on certificates 3399, 3400, 3432, 3448, 3449, and 3512 have not devalued.

04/28/2021 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 416258 STATUS: C DISP CODE: _____
RECEIVED: 03/31/2021 PROJTYPE: BERC ISSUED DT: _____
SUP-DISP DATE: 04/28/2021

STAFF ASSIGNED TO PROJECT:

MERCADO, MARIE

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: AMEREX BROKERS LLC

CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046

REG ENTITY ID:

SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC

COUNTY:

NEAREST CITY:

LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS

TITLE: VP/SR. COUNSEL

ROLE: AAR

STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700

CITY/STATE, ZIP: SUGAR LAND, TX , 77478-

PHONE: 281-340-5212 -

EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON

TITLE: Emissions Broker/Consultant

ROLE: AAAR

STREET:

CITY/STATE, ZIP:

PHONE: 281-808-3503 -

EMAIL: KCOVINGTON@AMEREXENERGY.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RRVW

DATE ENTERED: 2021-04-22 00:00:00.0

DELETED DATE: EFFECTIVE YEAR:

CONTAMINATE: **VOC**

TONS: **0** DOLLARS: **0**

ALLOWANCE **0**

CERTIFICATE NO.: **0** COUNTY :

COMPANY DATA

COMPANY NAME: AMEREX BROKERS LLC

CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046

REG ENTITY ID:

SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC

COUNTY:

NEAREST CITY:

LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS

TITLE: VP/SR. COUNSEL

ROLE: AAR

STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700

CITY/STATE, ZIP: SUGAR LAND, TX , 77478-

PHONE: 281-340-5212 -

EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON

TITLE: Emissions Broker/Consultant

ROLE: AAAR

STREET:

CITY/STATE, ZIP:

PHONE: 281-808-3503 -

EMAIL: KCOVINGTON@AMEREXENERGY.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2021-04-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: VOC

TONS: 0.10

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: 3399 COUNTY :

COMPANY DATA

COMPANY NAME: AMEREX BROKERS LLC

CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046

REG ENTITY ID:

SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC

COUNTY:

NEAREST CITY:

LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS

TITLE: VP/SR. COUNSEL

ROLE: AAR

STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700
CITY/STATE, ZIP: SUGAR LAND, TX , 77478-
PHONE: 281-340-5212 -
EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-808-3503 -
EMAIL: KCOVINGTON@AMEREXENERGY.COM

TITLE: Emissions Broker/Consultant

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2021-04-22 00:00:00.0
CONTAMINATE: **VOC**
ALLOWANCE: **0**

DELETED DATE:
TONS: **5.00**
CERTIFICATE NO.: **3400** COUNTY :

EFFECTIVE YEAR:
DOLLARS: **0**

COMPANY DATA

COMPANY NAME: AMEREX BROKERS LLC
CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046
REG ENTITY ID:
SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC
COUNTY:
LOCATION:

NEAREST CITY:

CONTACT DATA

NAME: AMALIA BERRIOS
ROLE: AAR
STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700
CITY/STATE, ZIP: SUGAR LAND, TX , 77478-
PHONE: 281-340-5212 -
EMAIL: ABERRIOS@AMEREXENERGY.COM

TITLE: VP/SR. COUNSEL

NAME: KELLY COVINGTON
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-808-3503 -
EMAIL: KCOVINGTON@AMEREXENERGY.COM

TITLE: Emissions Broker/Consultant

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2021-04-22 00:00:00.0
DELETED DATE:
EFFECTIVE YEAR:

CONTAMINATE: **VOC**
ALLOWANCE**0**

TONS: **0.70** DOLLARS: **0**
CERTIFICATE NO.: **3432** COUNTY :

COMPANY DATA

COMPANY NAME: AMEREX BROKERS LLC
CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046
REG ENTITY ID:
SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC
COUNTY: NEAREST CITY:
LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS TITLE: VP/SR. COUNSEL
ROLE: AAR
STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700
CITY/STATE, ZIP: SUGAR LAND, TX , 77478-
PHONE: 281-340-5212 -
EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON TITLE: Emissions Broker/Consultant
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-808-3503 -
EMAIL: KCOVINGTON@AMEREXENERGY.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2021-04-22 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **VOC** TONS: **4.20** DOLLARS: **0**
ALLOWANCE**0** CERTIFICATE NO.: **3448** COUNTY :

COMPANY DATA

COMPANY NAME: AMEREX BROKERS LLC
CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046
REG ENTITY ID:
SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC
COUNTY: NEAREST CITY:
LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS TITLE: VP/SR. COUNSEL
ROLE: AAR
STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700
CITY/STATE, ZIP: SUGAR LAND, TX , 77478-
PHONE: 281-340-5212 -
EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON TITLE: Emissions Broker/Consultant
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-808-3503 -
EMAIL: KCOVINGTON@AMEREXENERGY.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2021-04-22 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **VOC** TONS: **3.00** DOLLARS: **0**
ALLOWANCE **0** CERTIFICATE NO.: **3449** COUNTY :

COMPANY DATA

COMPANY NAME: AMEREX BROKERS LLC
CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046
REG ENTITY ID:
SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC
COUNTY: NEAREST CITY:
LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS TITLE: VP/SR. COUNSEL
ROLE: AAR
STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700
CITY/STATE, ZIP: SUGAR LAND, TX , 77478-
PHONE: 281-340-5212 -
EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON TITLE: Emissions Broker/Consultant
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-808-3503 -
EMAIL: KCOVINGTON@AMEREXENERGY.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2021-04-22 00:00:00.0

CONTAMINATE: **VOC**ALLOWANCE**0**

DELETED DATE:

EFFECTIVE YEAR:

TONS: **10.40**DOLLARS: **0**CERTIFICATE NO.: **3512** COUNTY :

TRACKING ACTIVITES

PROJECT SUBMITTED : 03/31/2021 PROJECT RECEIVED BY PM : 04/01/2021 TEAM LEAD REVIEW : 04/22/2021

SECTION MANAGER REVIEW : 04/26/2021



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

416258

I. REQUESTOR INFORMATION			
A. Company Name: Amerex Brokers			
Mailing Address: 1 Sugar Creek Center Blvd Suite 700			
City: Sugar Land	State: Texas	Zip Code: 77478	
B. Contact Name: Kelly Covington			
Telephone: 281-808-3503	Fax:		
II. EMISSION CREDIT OWNER INFORMATION			
A. Company Name: Chevron Phillips			
B. Nonattainment area: HGB			
C. Contact Name: Julie Hicks			
Telephone: 281-813-5472	Fax:		
III. EMISSION CREDIT CERTIFICATES TO BE REVIEWED			
Certificate No.: 3399	Exp. Date: 8/31/2021	TPY VOC: .1	TPY
Certificate No.: 3400	Exp. Date: 9/26/2021	TPY VOC: 5.0	TPY
Certificate No.: 3432	Exp. Date: 11/02/2021	TPY VOC: .7	TPY
Certificate No.: 3449	Exp. Date: 11/02/2021	TPY VOC: 3.0	TPY
Certificate No 3448	Exp. Date: 11/30/2021	TPY VOC: 4.2	
Certificate No 3512	Exp. Date: 12/31/2021	TPY VOC: 10.4	
IV. EMISSION RATE RULE AND REGULATION CHANGES			
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:			
V. SIGNATURE			
I, <u>Kelly Covington</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>Kelly Covington</u>		Signature	
Date <u>3/08/2021</u>			
Title <u>Managing Director</u>			

Mail application to:
Texas Commission on Environmental Quality
Emission Banking and Trading Program MC 206

From: [Marie Mercado](#)
To: ["aberrios@amerexenergy.com"](mailto:aberrios@amerexenergy.com)
Cc: [Kelly Covington \(kcovington@amerexenergy.com\)](mailto:kcovington@amerexenergy.com)
Subject: TCEQ EBT Documents - ERC Re-Review - Broker Account - Amerex Brokers LLC
Date: Wednesday, April 28, 2021 3:54:00 PM
Attachments: [416258 ECLT BKR1046.pdf](#)

Attached: PDF letter

Please see the attached EBT document(s) for project number 416258. If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality
EBT Programs
(512) 239-4900
ebt@tceq.texas.gov

Sign up to receive e-mail updates on EBT programs at <https://public.govdelivery.com/accounts/TXTCEQ/subscriber/new>. Select Emissions Banking and Trading (EBT) Program under the Air Quality heading.

From: [EBTTL](#)
To: [PSSMGR](#)
Cc: [Marie Mercado](#)
Subject: For review and approval by 04/28/2021: ERC Re-Review 416258
Date: Monday, April 26, 2021 11:32:47 AM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[416258 ECRB BKR1046.docx](#)
[416258 ECLT BKR1046.docx](#)
[416258 Project File BKR1046.pdf](#)
[416258 EBT Route Slip.docx](#)

Daniel,

Please find the attached documents for ERC Re-Review 416258. Please note that these are the same certificates (minus Certificate 3395) that were reviewed in Project 416274. Project 416274 was sent to Sam by Beryl this morning as expedited review.

On the letter, I noticed that in project 416274 Beryl had deleted the description of the credit generation. Based on this, I amended Marie's letter and deleted the same. The description of the credit generation is part of the letter template; please let us know if the template needs to be amended.

Let us know if you have questions.

Melissa Ruano

Emissions Banking and Trading Program Team Leader
Texas Commission on Environmental Quality
Air Permits Division

Email: Melissa.Ruano@tceq.texas.gov

How is our customer service? Fill out our customer satisfaction survey at www.tceq.texas.gov/goto/customersurvey

[Sign up to receive e-mail updates](#) on EBT programs. Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.

From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Thursday, April 22, 2021 6:52 PM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For review and approval by 04/30/2021: ERC Re-Review 416258 (Resend with corrected Subject Line)

Hi Melissa,

Attached for your review and approval are the documents for ERC Intent 416258.

Sincerely,

Marie Mercado, P.E.

Engineer IV



**TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

Emissions Trading and Banking Programs, MC-163
Office of Air, Air Permits Division, Permit Support Section
PO BOX 13087
Austin, Texas 78711-3087
512.239.2054 (Forwarded to Personal Cell Phone)
512.239.6188 (Fax)
Marie.Mercado@tceq.texas.gov (Main Point of Contact)

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Sign up to receive email updates on EBT at <https://public.govdelivery.com/accounts/TXTCEQ/subscriber/new>. Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.



From: [PSSMGR](#)
To: [Beryl Thatcher](#)
Cc: [EBTTL](#); [Marie Mercado](#)
Subject: FW: For review and approval by 04/28/2021: ERC Re-Review 416258
Date: Monday, April 26, 2021 4:06:06 PM
Attachments: [416258 ECRR BKR1046.docx](#)
[416258 ECLT BKR1046.docx](#)
[416258 Project File BKR1046.pdf](#)
[416258 EBT Route Slip.docx](#)

Please find the attached documents for ERC Re-Review 416258. Please note that these are the same certificates (minus Certificate 3395) that were reviewed in Project 416274, but the request to review is from a different person. Project 416274 was approved this morning..

From: [APDDIR](#)
To: [Beryl Thatcher](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Marie Mercado](#)
Subject: RE: For review and approval by 04/28/2021: ERC Re-Review 416258
Date: Wednesday, April 28, 2021 7:46:13 AM

Approved

Samuel Short
Air Permits Division
Texas Commission on Environmental Quality
512 239-5363
samuel.short@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customerurvey

From: Beryl Thatcher <Beryl.Thatcher@Tceq.Texas.Gov>
Sent: Tuesday, April 27, 2021 10:43 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: For review and approval by 04/28/2021: ERC Re-Review 416258

Please find the attached documents for ERC Re-Review 416258. Please note that these are the same certificates (minus Certificate 3395) that were reviewed in Project 416274, but the request to review is from a different person. Project 416274 was approved this morning.

APD Emissions Banking and Trading Correspondence Route Slip

Decision Due Date: 04/28/2021

Project Type: ERC Re-Review

Project No: 416258

	Initials	Date	Comments
Marie Mercado, Project Manager	MM	04/22/2021	
Melissa Ruano, Team Leader	MR	4/26/2021	
Daniel Menendez, Section Manager	DM	4/26/21	
Beryl Thatcher, Assistant Director			
Sam Short, Division Director			
Mailout Information			