

Jon Niermann, *Chairman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 9, 2024

GRAHAM W. BACON
EXECUTIVE VICE PRESIDENT & CHIEF OPERATING OFFICER
ENTERPRISE PRODUCTS OPERATING LLC
PO BOX 4324
HOUSTON, TEXAS 77210-4324
Via email

Subject: Use of Discrete Emission Credits
Enterprise Products Operating LLC
Enterprise Mont Belvieu Complex
Customer Number: CN603211277
Regulated Entity Number: RN102323268
EBT Portfolio Number: P3271
Project Number: 418726

Dear Graham W. Bacon:

This letter is in response to the Notice of Use of Discrete Emission Credits submitted on March 8, 2024, regarding the use of nitrogen oxides (NO_x) and volatile organic compound (VOC) discrete emission reduction credits (DERCs) for exceeding permit allowables per 30 Texas Administrative Code (TAC) §101.376(b)(1)(A). The Texas Commission on Environmental Quality (TCEQ) is approving the DERC use as summarized below. Any retained certificates are now available for future use or trade as allowed under 30 Texas Administrative Code Chapter 101, Subchapter H, Division 4.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Amount Used (tons)	Retained Certificate	Amount Retained (tons)
NO _x	12/15/2022 - 12/15/2023	D3615	11.0	6.0	D3723	5.0
VOC	12/15/2022 - 12/15/2023	D3527	5.5	2.4	D3725	3.1

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 Emily Furlong at Emily.Furlong@tceq.texas.gov, or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

cc: Bradley J Cooley, Senior Director, Enterprise Products Operating LLC
Tucker Jacobson, Manager, Environmental, Enterprise Products Operating LLC
Charles Parmley, Environmental Scientist, Enterprise Products Operating LLC
Pranav Kulkarni, Manager, Enterprise Products Operating LLC
Christopher Benton, Field Environmental Manager, Enterprise Products Operating LLC
Jon Fields, Director, Field Environmental, Enterprise Products Operating LLC

Discrete Emission Reduction Credit (DERC) Use Technical Review

Project Number:	418726	Project Manager:	Emily Furlong
Customer Reference No.:	CN603211277	Company Name:	Enterprise Products Operating LLC
Regulated Entity Reference No.:	RN102323268	Site Name:	Enterprise Mont Belvieu Complex
Portfolio Number:	P3271	County:	Chambers

Project Overview

Review	Explanation
Application Submitted Date:	3/8/2024
Corresponding Intent to Use Project:	417506
Intent Amount and Certificates:	16.5 tons from certificates D3615 and D3527
Pollutant:	NO _x and VOC
Reason for Use:	Exceeding permit allowables per 30 Texas Administrative Code (TAC) §101.376(b)(1)(A)
Use period:	12/15/2022 - 12/15/2023
Use Amount and Certificates:	8.4 tons from certificates D3722 (6.0 tons NO _x) and D3724 (2.4 tons VOC)
Retained Amount and Certificates:	8.1 tons in certificates D3723 and D3725
Additional Information:	The MAERT limits used for the following calculations were established prior to the use period for NSR Permit 107523. The limits for EPN SK25.801 were set at 8.25 tpy of NO _x emissions and 3.1 tpy of VOC emissions. A new MAERT limit has been established for the facility; however, the company asserted that the new limit had not gone into effect until after the use period. Because of this, the 8.25 tpy NO _x and 3.1 tpy VOC limits were used in determining the amount of credits needed for permit exceedance.

Calculation Methodology

Compliance with annual emissions limits is based on a 12-month rolling period, as established in the associated MAERT documentation. Per 30 TAC §101.376(b)(1)(A), DERCs cannot be used to cover exceedances made by EPN SK25.801 for 24 months following the most recent use event. DERCs cannot be used again for facility exceedances until March 2025 for NO_x and November 2025 for VOCs.

NO_x

The NO_x MAERT limit established for EPN SK25.801 was 8.25 tpy during the use period. To calculate the DERCs used to exceed this limit, the company determined the 12-month rolling emissions for each month of the use period. The 8.25 tpy MAERT limit was then subtracted from the first month's rolling NO_x emissions to identify the amount of DERCs to be used to cover any limit exceedances. DERCs were then applied the first month of exceedance, bringing the company back down to compliance. This process was repeated for each subsequent month. The exceedances were totaled to equal 5.4 tons. Exceedances occurred in December of 2022, January of 2023, and February of 2023. The following table demonstrates the values used in the

calculations for these months. The full emissions and rolling average for each month during the use period is available in the Project File:

Month/Year	Monthly NO _x Emissions (1)	12-Month Rolling NO _x Emissions	Monthly DERCs Used to Meet Authorized Limits
December 2022	1.55	11.89	3.64
January 2023	2.26	12.64	0.75
February 2023	1.75	13.60	0.96
		Total	5.4 (rounded up)

(1) Monthly emissions based on CEMS data

A 10% environmental contribution (0.6 ton) was added to the DERCs used, resulting in a final total of 6.0 tons.

VOC

The VOC MAERT limit established for EPN SK25.801 was 3.1 tpy during the use period. Using the same methodology used to calculate NO_x emissions, the company determined the 12-month rolling average for each month of the use period. Starting with the first month of the use period, they subtracted the 3.1 tpy MAERT limit from the rolling emissions. DERCs were used to cover any emissions that exceeded the MAERT limit, bringing the facility back down to compliance. This was repeated for each subsequent month. The final DERCs were totaled to equal 2.1 tons of VOC DERCs needed to cover the limit exceedances. Exceedances occurred in February, May, June, July, September, and October of 2023. The following table demonstrates the values used in the calculations for these months. The full emissions and rolling average for each month during the use period is available in the Project File:

Month/Year	Monthly VOC Emissions *	12-Month Rolling VOC Emissions	Monthly DERCs used to Meet Authorized Limits
February 2023	0.86	3.39	0.29
May 2023	0.16	3.42	0.03
June 2023	0.47	3.78	0.35
July 2023	0.81	4.44	0.67
September 2023	0.57	4.89	0.45
October 2023	0.51	5.19	0.30
		Total	2.1 (rounded up)

(1) Monthly emissions based on CEMS data

A 10% environmental contribution (0.3 ton) was added to the DERCs use, resulting in a final total of 2.4 tons.

Conclusion

The TCEQ is approving the request to use of 8.4 tons of NO_x and VOC DERCs from certificates D3615 and D3527 for exceeding permit allowables per 30 TAC §101.376(b)(1)(A) during the use period of 12/15/2022 - 12/15/2023. Certificates D3723 and D3725 (8.1 tons NO_x and VOC) will be returned to the company for future use.

04/09/2024 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 418726 STATUS: C DISP CODE: _____
RECEIVED: 03/08/2024 PROJTYPE: BUSE ISSUED DT: _____
SUP-DISP DATE: 04/09/2024

STAFF ASSIGNED TO PROJECT:

FURLONG, EMILY

PROJECT NOTES:

[.Attachments](#) from Steers
[.Copy Of Record](#) from Steers

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: ENTERPRISE PRODUCTS OPERATING LLC
CUSTOMER REGISTRY ID: CN603211277

PORTFOLIO DATA

NUMBER: P3271 NAME: ENTERPRISE MONT BELVIEU - RN102323268

SITE DATA

ACCOUNT: CI0008R
REG ENTITY ID: RN102323268
SITE NAME: ENTERPRISE MONT BELVIEU COMPLEX
COUNTY: CHAMBERS NEAREST CITY: MONT BELVIEU
LOCATION: 10207 FM 1942, MONT BELVIEU, TX

CONTACT DATA

NAME: BRADLEY J COOLEY TITLE: SENIOR DIRECTOR
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 713-381-6595 -
EMAIL: ENVIRONMENTAL@EPROD.COM

NAME: PRANAV KULKARNI TITLE: MANAGER
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-381-5830 -
EMAIL: PKULKARNI@EPROD.COM

NAME: GRAHAM W. BACON TITLE: EXECUTIVE VICE PRESIDENT & CHIEF OPERATING OFFICER
ROLE: AAR
STREET: PO BOX 4324
CITY/STATE, ZIP: HOUSTON, TX , 77210-4324
PHONE: 713-381-6595 -
EMAIL: ENVIRONMENTAL@EPROD.COM

NAME: TUCKER JACOBSON TITLE: MANAGER, ENVIRONMENTAL
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-381-4313 -

EMAIL: WTJACOBSON@EPROD.COM

NAME: JON FIELDS
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-381-6684 -
EMAIL: JEFIELDS@EPROD.COM

TITLE: DIRECTOR, FIELD ENVIRONMENTAL

NAME: BEATRIZ SANTAMARIA
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-381-4308 -
EMAIL: BESANTAMARIA@EPROD.COM

TITLE: SENIOR ENVIRONMENTAL ENGINEER

NAME: CHRISTOPHER BENTON
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 832-501-4078 -
EMAIL: CRBENTON@EPROD.COM

TITLE: FIELD ENVIRONMENTAL MANAGER

NAME: CHARLES PARMLEY
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-806-0098 -
EMAIL: CRPARMLEY@EPROD.COM

TITLE: ENVIRONMENTAL SCIENTIST

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2024-03-08 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:
TONS: 5.00 DOLLARS: 0
CERTIFICATE NO.: D3723 COUNTY : CHAMBERS

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE
DATE ENTERED: 2024-03-08 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:
TONS: 6.00 DOLLARS:
CERTIFICATE NO.: D3722 COUNTY : CHAMBERS

COMPANY DATA

COMPANY NAME: ENTERPRISE PRODUCTS OPERATING LLC
CUSTOMER REGISTRY ID: CN603211277

PORTFOLIO DATA

NUMBER: P3271 NAME: ENTERPRISE MONT BELVIEU - RN102323268

SITE DATA

ACCOUNT: CI0008R
REG ENTITY ID: RN102323268
SITE NAME: ENTERPRISE MONT BELVIEU COMPLEX
COUNTY: CHAMBERS
LOCATION: 10207 FM 1942, MONT BELVIEU, TX

NEAREST CITY: MONT BELVIEU

CONTACT DATA

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ROLE: AAAR
STREET:
CITY/STATE, ZIP:

TITLE: SENIOR DIRECTOR

PHONE: 713-381-6595 -
EMAIL: ENVIRONMENTAL@EPROD.COM

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EMAIL: JEFIELDS@EPROD.COM

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ROLE: TECHNICAL
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TITLE: SENIOR ENVIRONMENTAL ENGINEER

NAME: CHRISTOPHER BENTON
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STREET:
CITY/STATE, ZIP:
PHONE: 832-501-4078 -
EMAIL: CRBENTON@EPROD.COM

TITLE: FIELD ENVIRONMENTAL MANAGER

NAME: CHARLES PARMLEY
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-806-0098 -
EMAIL: CRPARMLEY@EPROD.COM

TITLE: ENVIRONMENTAL SCIENTIST

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2024-03-08 00:00:00.0
CONTAMINATE: **VOC**
ALLOWANCE: **0**

DELETED DATE: EFFECTIVE YEAR:
TONS: **3.10** DOLLARS: **0**
CERTIFICATE NO.: **D3725** COUNTY : **CHAMBERS**

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2024-03-08 00:00:00.0

CONTAMINATE: **VOC**

ALLOWANCE**0**

DELETED DATE:

EFFECTIVE YEAR:

TONS: **2.40**

DOLLARS:

CERTIFICATE NO.: **D3724** COUNTY : **CHAMBERS**

TRACKING ACTIVITES

PROJECT RECEIVED BY PM : 03/08/2024 PROJECT SUBMITTED : 03/08/2024 TEAM LEAD REVIEW : 03/18/2024

SECTION MANAGER REVIEW : 04/05/2024

Portfolio Detail

Portfolio Number: P3271
Portfolio Name: ENTERPRISE MONT BELVIEU - RN102323268
Company Name: ENTERPRISE PRODUCTS OPERATING LLC

Actual Allowances for Pollutant NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Penalty from last year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Certified Allocation	<u>982.2</u>	<u>982.2</u>	<u>982.2</u>	<u>982.2</u>	<u>982.2</u>	<u>982.2</u>	<u>982.2</u>
Allowances for Offsets	<u>-110.3</u>	<u>-110.3</u>	<u>-110.3</u>	<u>-110.3</u>	<u>-110.3</u>	<u>-110.3</u>	<u>-110.3</u>
Future Trade In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Future Trade Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>223.3</u>	<u>223.3</u>	<u>223.3</u>	<u>223.3</u>	<u>223.3</u>	<u>223.3</u>	<u>223.3</u>
Stream Traded Out	<u>-170.9</u>	<u>-171.1</u>	<u>-230.8</u>	<u>-245.5</u>	<u>-254.1</u>	<u>-254.1</u>	<u>-254.1</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>29.5</u>	<u>0</u>
Current Traded Out	<u>-2.2</u>	<u>-5</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-248.6</u>	<u>-0</u>
Total Reported Emissions	-789	-713.7	-632.7	-626.4	-643	0	0
Quantification Penalty	-0	-0	-3.5	-17.9	-17.1	-0	-0
Current Used for Compliance	<u>-678.7</u>	<u>-603.4</u>	<u>-525.9</u>	<u>-534</u>	<u>-549.8</u>	<u>-0</u>	<u>-0</u>
Vintage From Previous Year	<u>259.1</u>	<u>243.5</u>	<u>315.8</u>	<u>338.6</u>	<u>315.8</u>	<u>291.4</u>	<u>0</u>
Vintage Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>73.9</u>	<u>0</u>
Vintage Traded Out	<u>-94.4</u>	<u>-156.7</u>	<u>-50</u>	<u>-31</u>	<u>-50</u>	<u>-85.4</u>	<u>-0</u>
Vintage Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
DERC Intent	0	0	0	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0.1	0.1	0.1	0.1	0.1	0.1	0.1
CURRENT ALLOWANCE BALANCE	<u>243.5</u>	<u>315.8</u>	<u>338.6</u>	<u>315.8</u>	<u>291.4</u>	<u>622.1</u>	<u>841.2</u>
VINTAGE ALLOWANCE BALANCE	<u>164.7</u>	<u>86.8</u>	<u>265.8</u>	<u>307.6</u>	<u>265.8</u>	<u>279.9</u>	<u>0</u>

Allowable Allowances

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Starting Allowance for	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
 Starting Allowance for HRSG **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0

BALANCE	0	0	0	0	0	0	0
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** This fin was recertified.

Flexible Allowances for Pollutant NOX

Balance	2018	2019	2020	2021	2022	2023	2024
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0
Associated Annual Emissions	-0	-0	-0	-0	-0	-0	-0
BALANCE	0	0	0	0	0	0	0

Sb7 Allowances for Pollutant NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Previous Year Deficit	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances Remaining from Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

DERC >

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
D3641	NOX	100.00	DERC_BUY	12/30/3000	04/01/2001	03/31/2002	FORT BEND	D3514
D3669	NOX	3.40	DERC_USE	11/06/2023	05/06/1999	05/06/2000	HARRIS	D3636
D3615	NOX	17.20	DERC_INTEN	12/16/2022	05/06/1999	05/06/2000	HARRIS	D2769
D3668	NOX	2.80	DERC_RET	12/30/3000	05/06/1999	05/06/2000	HARRIS	D3636
D3616	NOX	4.00	DERC_USE	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2770
D3617	NOX	8.90	DERC_INTEN	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2055
D3636	NOX	6.20	DERC_INTEN	11/06/2023	05/06/1999	05/06/2000	HARRIS	D3615
D3723	NOX	5.65	DERC_RET	12/30/3000	05/06/1999	05/06/2000	HARRIS	D3615
D3617	NOX	8.90	DERC_USE	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2055
D3618	NOX	0.90	DERC_BUY	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2133
D3617	NOX	8.90	DERC_BUY	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2055
D3722	NOX	5.35	DERC_USE	12/30/3000	05/06/1999	05/06/2000	HARRIS	D3615
D3615	NOX	17.20	DERC_BUY	12/16/2022	05/06/1999	05/06/2000	HARRIS	D2769
D3616	NOX	4.00	DERC_INTEN	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2770
D3618	NOX	0.90	DERC_INTEN	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2133
D3616	NOX	4.00	DERC_BUY	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2770
D3618	NOX	0.90	DERC_USE	11/06/2023	05/06/1999	05/06/2000	MONTGOMERY	D2133
D3636	NOX	6.20	DERC_RET	11/06/2023	05/06/1999	05/06/2000	HARRIS	D3615

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
2811	NOX	1.40	ERC_INTEN	08/07/2017	07/15/2013	07/15/2018	HARRIS	2732
3470	NOX	0.10	ERC_GEN_POINT	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3471	NOX	0.10	ERC_USE	09/30/2021	09/04/2018	09/04/2023	CHAMBERS	3471
3604	NOX	30.30	ERC_BUY	09/30/2021	01/31/2017	01/31/2022	HARRIS	3604
3610	NOX	4.10	ERC_INTEN	12/02/2021	12/31/2016	12/31/2021	MONTGOMERY	3580
3687	NOX	3.10	ERC_USE	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3853	NOX	3.50	ERC_INTEN	05/13/2022	04/10/2017	04/10/2022	CHAMBERS	0
4089	NOX	1.10	ERC_INTEN	02/28/2023	09/04/2018	09/04/2023	CHAMBERS	0
2812	NOX	0.50	ERC_USE	08/07/2017	04/01/2013	04/01/2018	HARRIS	2733
2812	NOX	0.50	ERC_BUY	08/07/2017	04/01/2013	04/01/2018	HARRIS	2733
2814	NOX	4.10	ERC_USE	08/07/2017	07/26/2013	07/26/2018	HARRIS	2747
3423	NOX	5.00	ERC_INTEN	11/19/2021	06/09/2014	06/09/2019	HARRIS	3392
3470	NOX	0.10	ERC_INTEN	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3595	NOX	16.50	ERC_USE	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3604	NOX	30.30	ERC_INTEN	09/30/2021	01/31/2017	01/31/2022	HARRIS	3604
3687	NOX	3.10	ERC_GEN	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
2812	NOX	0.50	ERC_INTEN	08/07/2017	04/01/2013	04/01/2018	HARRIS	2733
2814	NOX	4.10	ERC_INTEN	08/07/2017	07/26/2013	07/26/2018	HARRIS	2747
3609	NOX	3.10	ERC_USE	09/30/2020	12/31/2016	12/31/2021	MONTGOMERY	3580
3611	NOX	1.90	ERC_BUY	09/30/2021	01/31/2017	01/31/2022	HARRIS	3611
3854	NOX	8.90	ERC_INTEN	05/13/2022	09/04/2018	09/04/2023	CHAMBERS	0
4102	NOX	7.50	ERC_INTEN	08/17/2023	09/04/2018	09/04/2023	CHAMBERS	0
2811	NOX	1.40	ERC_USE	08/07/2017	07/15/2013	07/15/2018	HARRIS	2732
3471	NOX	0.10	ERC_INTEN	09/30/2021	09/04/2018	09/04/2023	CHAMBERS	3471
3595	NOX	16.50	ERC_GEN	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3611	NOX	1.90	ERC_INTEN	09/30/2021	01/31/2017	01/31/2022	HARRIS	3611
3660	NOX	0.10	ERC_USE	09/30/2021	04/10/2017	04/10/2022	CHAMBERS	3660
4089	NOX	1.10	ERC_GEN	02/28/2023	09/04/2018	09/04/2023	CHAMBERS	0
2810	NOX	0.90	ERC_USE	08/07/2017	01/30/2013	01/30/2018	CHAMBERS	2797
3303	NOX	15.10	ERC_SELL	08/17/2018	06/09/2014	06/09/2019	HARRIS	3280
3303	NOX	15.10	ERC_BUY	08/17/2018	06/09/2014	06/09/2019	HARRIS	3280
3423	NOX	5.00	ERC_USE	11/19/2021	06/09/2014	06/09/2019	HARRIS	3392
3470	NOX	0.10	ERC_USE	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3580	NOX	7.20	ERC_INTEN	09/30/2020	12/31/2016	12/31/2021	MONTGOMERY	3575
3584	NOX	0.60	ERC_BUY	12/02/2021	11/30/2016	11/30/2021	HARRIS	3576
3595	NOX	16.50	ERC_INTEN	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3610	NOX	4.10	ERC_RET	12/02/2021	12/31/2016	12/31/2021	MONTGOMERY	3580
3610	NOX	4.10	ERC_USE	12/02/2021	12/31/2016	12/31/2021	MONTGOMERY	3580
3611	NOX	1.90	ERC_USE	09/30/2021	01/31/2017	01/31/2022	HARRIS	3611
3660	NOX	0.10	ERC_GEN_POINT	09/30/2021	04/10/2017	04/10/2022	CHAMBERS	3660
3774	NOX	2.30	ERC_INTEN	11/19/2021	09/04/2018	09/04/2023	CHAMBERS	0
3853	NOX	3.50	ERC_GEN	05/13/2022	04/10/2017	04/10/2022	CHAMBERS	0
3854	NOX	8.90	ERC_GEN	05/13/2022	09/04/2018	09/04/2023	CHAMBERS	0
4089	NOX	1.10	ERC_USE	02/28/2023	09/04/2018	09/04/2023	CHAMBERS	0

3604	NOX	30.30	ERC_USE	09/30/2021	01/31/2017	01/31/2022	HARRIS	3604
3774	NOX	2.30	ERC_USE	11/19/2021	09/04/2018	09/04/2023	CHAMBERS	0
4102	NOX	7.50	ERC_GEN	08/17/2023	09/04/2018	09/04/2023	CHAMBERS	0
2810	NOX	0.90	ERC_BUY	08/07/2017	01/30/2013	01/30/2018	CHAMBERS	2797
2811	NOX	1.40	ERC_BUY	08/07/2017	07/15/2013	07/15/2018	HARRIS	2732
2814	NOX	4.10	ERC_BUY	08/07/2017	07/26/2013	07/26/2018	HARRIS	2747
3423	NOX	5.00	ERC_BUY	11/19/2021	06/09/2014	06/09/2019	HARRIS	3392
3580	NOX	7.20	ERC_BUY	09/30/2020	12/31/2016	12/31/2021	MONTGOMERY	3575
2810	NOX	0.90	ERC_INTEN	08/07/2017	01/30/2013	01/30/2018	CHAMBERS	2797
3471	NOX	0.10	ERC_GEN_POINT	09/30/2021	09/04/2018	09/04/2023	CHAMBERS	3471
3584	NOX	0.60	ERC_INTEN	12/02/2021	11/30/2016	11/30/2021	HARRIS	3576
3584	NOX	0.60	ERC_USE	12/02/2021	11/30/2016	11/30/2021	HARRIS	3576
3660	NOX	0.10	ERC_INTEN	09/30/2021	04/10/2017	04/10/2022	CHAMBERS	3660
3687	NOX	3.10	ERC_INTEN	01/04/2022	01/07/2016	01/07/2021	CHAMBERS	0
3774	NOX	2.30	ERC_GEN	11/19/2021	09/04/2018	09/04/2023	CHAMBERS	0
3853	NOX	3.50	ERC_USE	05/13/2022	04/10/2017	04/10/2022	CHAMBERS	0
3854	NOX	8.90	ERC_USE	05/13/2022	09/04/2018	09/04/2023	CHAMBERS	0
4102	NOX	7.50	ERC_USE	08/17/2023	09/04/2018	09/04/2023	CHAMBERS	0

Portfolio Detail

Portfolio Number: P3271
Portfolio Name: ENTERPRISE MONT BELVIEU - RN102323268
Company Name: ENTERPRISE PRODUCTS OPERATING LLC

Actual Allowances for Pollutant VOC

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Penalty from last year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Certified Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances for Offsets	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Future Trade In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Future Trade Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	0	0	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage From Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
DERC Intent	0	0	0	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
CURRENT ALLOWANCE BALANCE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
VINTAGE ALLOWANCE BALANCE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

Allowable Allowances

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Starting Allowance for	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0

BALANCE	0	0	0	0	0	0	0
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** This fin was recertified.

Flexible Allowances for Pollutant VOC							
Balance	2018	2019	2020	2021	2022	2023	2024
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0
Associated Annual Emissions	-0	-0	-0	-0	-0	-0	-0
BALANCE	0	0	0	0	0	0	0

Sb7 Allowances for Pollutant VOC							
Balance/Year	2018	2019	2020	2021	2022	2023	2024
Previous Year Deficit	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances Remaining from Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

DERC >								
Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
D3725	VOC	3.41	DERC_RET	12/30/3000	11/15/1992	11/14/1996	HARRIS	D3527
D3527	VOC	255.00	DERC_INTEN	12/16/2022	11/15/1992	11/14/1996	HARRIS	D3520
D3538	VOC	50.00	DERC_USE	04/27/2021	11/15/1992	11/14/1996	HARRIS	D3520
D3520	VOC	310.00	DERC_BUY	04/27/2021	11/15/1992	11/14/1996	HARRIS	D3025
D3557	VOC	5.00	DERC_RET	12/30/3000	11/15/1992	11/14/1996	HARRIS	D3520
D3637	VOC	249.50	DERC_RET	12/30/3000	11/15/1992	11/14/1996	HARRIS	D3527
D3724	VOC	2.09	DERC_USE	12/30/3000	11/15/1992	11/14/1996	HARRIS	D3527
D3527	VOC	255.00	DERC_RET	12/16/2022	11/15/1992	11/14/1996	HARRIS	D3520
D3520	VOC	310.00	DERC_INTEN	04/27/2021	11/15/1992	11/14/1996	HARRIS	D3025
ERC								
Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
2599	VOC	9.80	ERC_USE	09/27/2013	03/23/2009	03/23/2014	HARRIS	2543
2611	VOC	11.50	ERC_INTEN	09/27/2013	10/04/2011	10/04/2016	BRAZORIA	2602
2629	VOC	0.20	ERC_USE	09/27/2013	03/31/2009	03/31/2014	GALVESTON	2618
2645	VOC	11.60	ERC_SELL	06/30/2016	03/13/2012	03/13/2017	LIBERTY	2593
2657	VOC	7.10	ERC_BUY	05/17/2016	12/02/2011	12/02/2016	CHAMBERS	2654
2885	VOC	1.20	ERC_BUY	08/07/2017	11/12/2014	11/12/2019	HARRIS	2823

2938	VOC	86.60	ERC_SELL	12/28/2016	08/28/2015	08/28/2020	MONTGOMERY	2933
2950	VOC	6.00	ERC_USE	03/30/2016	10/04/2011	10/04/2016	BRAZORIA	2716
2965	VOC	3.90	ERC_RET	06/30/2016	12/02/2011	12/02/2016	CHAMBERS	2657
2969	VOC	4.40	ERC_RET	06/30/2016	06/22/2012	06/22/2017	HARRIS	2628
3040	VOC	77.00	ERC_RET	08/07/2017	08/28/2015	08/28/2020	MONTGOMERY	2938
3123	VOC	6.90	ERC_SELL	10/27/2017	08/28/2015	08/28/2020	MONTGOMERY	3040
3473	VOC	0.30	ERC_GEN_POINT	11/06/2019	09/04/2018	09/04/2023	CHAMBERS	0
3551	VOC	5.60	ERC_INTEN	09/30/2021	05/23/2019	05/23/2024	GALVESTON	3546
3627	VOC	2.90	ERC_BUY	10/07/2021	12/22/2015	12/22/2020	LIBERTY	3625
3661	VOC	0.20	ERC_GEN_POINT	09/30/2021	04/10/2017	04/10/2022	CHAMBERS	3661
3799	VOC	1.80	ERC_USE	10/07/2021	05/31/2016	05/31/2021	GALVESTON	3463
3800	VOC	23.00	ERC_BUY	10/07/2021	08/26/2016	08/26/2021	GALVESTON	3464
3806	VOC	4.20	ERC_BUY	09/13/2021	11/30/2016	11/30/2021	HARRIS	3806
3806	VOC	4.20	ERC_INTEN	09/13/2021	11/30/2016	11/30/2021	HARRIS	3806
3838	VOC	4.50	ERC_INTEN	10/26/2021	07/21/2018	07/03/2025	LIBERTY	3818
3838	VOC	4.50	ERC_USE	10/26/2021	07/21/2018	07/03/2025	LIBERTY	3818
3839	VOC	8.50	ERC_INTEN	10/26/2021	10/23/2017	10/23/2022	HARRIS	3819
3840	VOC	6.60	ERC_USE	10/26/2021	01/29/2019	01/29/2025	HARRIS	3820
3841	VOC	29.70	ERC_BUY	10/26/2021	12/20/2016	12/20/2021	HARRIS	3588
3844	VOC	8.40	ERC_INTEN	10/26/2021	01/29/2019	01/29/2025	HARRIS	3833
3847	VOC	1.70	ERC_USE	10/26/2021	03/16/2020	03/16/2026	HARRIS	3830
3848	VOC	3.40	ERC_INTEN	10/26/2021	04/21/2020	04/21/2026	LIBERTY	3831
3849	VOC	6.10	ERC_INTEN	10/26/2021	05/07/2020	05/07/2026	LIBERTY	3832
3872	VOC	0.10	ERC_USE	10/20/2021	02/04/2017	02/04/2022	GALVESTON	3872
2599	VOC	9.80	ERC_BUY	09/27/2013	03/23/2009	03/23/2014	HARRIS	2543
2600	VOC	0.90	ERC_INTEN	09/27/2013	05/04/2009	05/04/2014	HARRIS	2600
2600	VOC	0.90	ERC_USE	09/27/2013	05/04/2009	05/04/2014	HARRIS	2600
2628	VOC	8.00	ERC_RET	05/12/2016	06/22/2012	06/22/2017	HARRIS	2622
2638	VOC	10.80	ERC_BUY	05/17/2016	11/03/2011	11/03/2016	BRAZORIA	2633
2645	VOC	11.60	ERC_BUY	06/30/2016	03/13/2012	03/13/2017	LIBERTY	2593
2735	VOC	21.80	ERC_BUY	12/28/2016	05/15/2013	05/15/2018	MONTGOMERY	2697
2737	VOC	6.50	ERC_BUY	12/28/2016	01/30/2013	01/30/2018	CHAMBERS	2736
2951	VOC	1.10	ERC_RET	05/17/2016	10/04/2011	10/04/2016	BRAZORIA	2716
3165	VOC	6.50	ERC_RET	11/06/2019	08/28/2015	08/28/2020	MONTGOMERY	3123
3492	VOC	7.70	ERC_INTEN	04/23/2020	11/12/2014	11/12/2019	HARRIS	3060
3799	VOC	1.80	ERC_BUY	10/07/2021	05/31/2016	05/31/2021	GALVESTON	3463
3805	VOC	0.70	ERC_USE	09/13/2021	11/02/2015	11/02/2021	FORT BEND	3805
3836	VOC	5.90	ERC_BUY	10/26/2021	06/15/2017	06/15/2022	BRAZORIA	3836
3836	VOC	5.90	ERC_USE	10/26/2021	06/15/2017	06/15/2022	BRAZORIA	3836
3840	VOC	6.60	ERC_RET	10/26/2021	01/29/2019	01/29/2025	HARRIS	3820
3840	VOC	6.60	ERC_INTEN	10/26/2021	01/29/2019	01/29/2025	HARRIS	3820
3841	VOC	29.70	ERC_RET	10/26/2021	12/20/2016	12/20/2021	HARRIS	3588
3844	VOC	8.40	ERC_BUY	10/26/2021	01/29/2019	01/29/2025	HARRIS	3833
3872	VOC	0.10	ERC_BUY	10/20/2021	02/04/2017	02/04/2022	GALVESTON	3872
3873	VOC	3.30	ERC_INTEN	10/20/2021	02/19/2017	02/19/2022	GALVESTON	3873
3918	VOC	2.60	ERC_RET	08/29/2023	05/07/2020	05/07/2026	LIBERTY	3849
4091	VOC	2.00	ERC_RET	08/17/2023	10/16/2019	10/16/2024	HARRIS	3946

4106	VOC	3.90	ERC_RET	08/29/2023	04/26/2018	04/26/2023	BRAZORIA	3538
4109	VOC	1.40	ERC_RET	12/30/3000	05/07/2020	05/07/2026	LIBERTY	3918
2657	VOC	7.10	ERC_RET	05/17/2016	12/02/2011	12/02/2016	CHAMBERS	2654
2708	VOC	14.30	ERC_BUY	08/07/2017	11/15/2009	11/15/2014	HARRIS	2673
2716	VOC	7.10	ERC_INTEN	03/30/2016	10/04/2011	10/04/2016	BRAZORIA	2611
3040	VOC	77.00	ERC_INTEN	08/07/2017	08/28/2015	08/28/2020	MONTGOMERY	2938
3120	VOC	6.80	ERC_USE	08/07/2017	05/15/2013	05/15/2018	MONTGOMERY	3038
3472	VOC	0.30	ERC_SELL	11/06/2019	01/07/2016	01/07/2021	CHAMBERS	0
3492	VOC	7.70	ERC_BUY	04/23/2020	11/12/2014	11/12/2019	HARRIS	3060
3800	VOC	23.00	ERC_USE	10/07/2021	08/26/2016	08/26/2021	GALVESTON	3464
3802	VOC	0.10	ERC_BUY	09/13/2021	05/02/2016	05/02/2021	HARRIS	3802
3803	VOC	0.10	ERC_INTEN	09/13/2021	08/31/2016	08/31/2021	HARRIS	3803
3804	VOC	5.00	ERC_BUY	09/13/2021	09/26/2016	09/26/2021	HARRIS	3804
3808	VOC	10.40	ERC_BUY	09/13/2021	12/31/2016	12/31/2021	MONTGOMERY	3808
3837	VOC	1.30	ERC_BUY	10/26/2021	07/25/2017	07/25/2022	BRAZORIA	3817
3837	VOC	1.30	ERC_USE	10/26/2021	07/25/2017	07/25/2022	BRAZORIA	3817
3838	VOC	4.50	ERC_BUY	10/26/2021	07/21/2018	07/03/2025	LIBERTY	3818
3843	VOC	3.40	ERC_BUY	10/26/2021	01/31/2017	01/31/2022	HARRIS	3544
3847	VOC	1.70	ERC_INTEN	10/26/2021	03/16/2020	03/16/2026	HARRIS	3830
3871	VOC	2.70	ERC_RET	10/20/2021	01/19/2017	01/19/2022	GALVESTON	3871
3871	VOC	2.70	ERC_BUY	10/20/2021	01/19/2017	01/19/2022	GALVESTON	3871
3946	VOC	8.70	ERC_INTEN	02/28/2023	10/16/2019	10/16/2024	HARRIS	3945
3946	VOC	8.70	ERC_BUY	02/28/2023	10/16/2019	10/16/2024	HARRIS	3945
2600	VOC	0.90	ERC_BUY	09/27/2013	05/04/2009	05/04/2014	HARRIS	2600
2629	VOC	0.20	ERC_BUY	09/27/2013	03/31/2009	03/31/2014	GALVESTON	2618
2645	VOC	11.60	ERC_RET	06/30/2016	03/13/2012	03/13/2017	LIBERTY	2593
2657	VOC	7.10	ERC_SELL	05/17/2016	12/02/2011	12/02/2016	CHAMBERS	2654
2735	VOC	21.80	ERC_SELL	12/28/2016	05/15/2013	05/15/2018	MONTGOMERY	2697
2965	VOC	3.90	ERC_SELL	06/30/2016	12/02/2011	12/02/2016	CHAMBERS	2657
3038	VOC	15.90	ERC_INTEN	08/07/2017	05/15/2013	05/15/2018	MONTGOMERY	2735
3472	VOC	0.30	ERC_GEN_POINT	11/06/2019	01/07/2016	01/07/2021	CHAMBERS	0
3472	VOC	0.30	ERC_RET	11/06/2019	01/07/2016	01/07/2021	CHAMBERS	0
3491	VOC	4.00	ERC_USE	07/12/2021	11/11/2014	11/11/2019	GALVESTON	2862
3581	VOC	1.50	ERC_BUY	09/30/2021	10/03/2019	10/03/2024	CHAMBERS	3581
3627	VOC	2.90	ERC_INTEN	10/07/2021	12/22/2015	12/22/2020	LIBERTY	3625
3800	VOC	23.00	ERC_INTEN	10/07/2021	08/26/2016	08/26/2021	GALVESTON	3464
3802	VOC	0.10	ERC_INTEN	09/13/2021	05/02/2016	05/02/2021	HARRIS	3802
3803	VOC	0.10	ERC_BUY	09/13/2021	08/31/2016	08/31/2021	HARRIS	3803
3808	VOC	10.40	ERC_INTEN	09/13/2021	12/31/2016	12/31/2021	MONTGOMERY	3808
3838	VOC	4.50	ERC_RET	10/26/2021	07/21/2018	07/03/2025	LIBERTY	3818
3843	VOC	3.40	ERC_INTEN	10/26/2021	01/31/2017	01/31/2022	HARRIS	3544
3844	VOC	8.40	ERC_RET	10/26/2021	01/29/2019	01/29/2025	HARRIS	3833
3848	VOC	3.40	ERC_BUY	10/26/2021	04/21/2020	04/21/2026	LIBERTY	3831
4106	VOC	3.90	ERC_INTEN	08/29/2023	04/26/2018	04/26/2023	BRAZORIA	3538
2629	VOC	0.20	ERC_INTEN	09/27/2013	03/31/2009	03/31/2014	GALVESTON	2618
2716	VOC	7.10	ERC_RET	03/30/2016	10/04/2011	10/04/2016	BRAZORIA	2611
2784	VOC	92.40	ERC_BUY	12/30/3000	09/14/2009	09/14/2014	DALLAS	2615

2884	VOC	21.90	ERC_BUY	02/18/2016	11/20/2012	11/20/2017	HARRIS	2871
2938	VOC	86.60	ERC_BUY	12/28/2016	08/28/2015	08/28/2020	MONTGOMERY	2933
2951	VOC	1.10	ERC_SELL	05/17/2016	10/04/2011	10/04/2016	BRAZORIA	2716
3473	VOC	0.30	ERC_SELL	11/06/2019	09/04/2018	09/04/2023	CHAMBERS	0
3473	VOC	0.30	ERC_RET	11/06/2019	09/04/2018	09/04/2023	CHAMBERS	0
3491	VOC	4.00	ERC_INTEN	07/12/2021	11/11/2014	11/11/2019	GALVESTON	2862
3569	VOC	6.70	ERC_USE	04/23/2020	11/12/2014	11/12/2019	HARRIS	3492
3570	VOC	1.00	ERC_INTEN	07/12/2021	11/12/2014	11/12/2019	HARRIS	3492
3581	VOC	1.50	ERC_INTEN	09/30/2021	10/03/2019	10/03/2024	CHAMBERS	3581
3627	VOC	2.90	ERC_USE	10/07/2021	12/22/2015	12/22/2020	LIBERTY	3625
3801	VOC	2.90	ERC_BUY	10/07/2021	12/02/2016	12/02/2021	GALVESTON	3465
3801	VOC	2.90	ERC_USE	10/07/2021	12/02/2016	12/02/2021	GALVESTON	3465
3803	VOC	0.10	ERC_USE	09/13/2021	08/31/2016	08/31/2021	HARRIS	3803
3807	VOC	3.00	ERC_INTEN	09/13/2021	11/02/2015	11/02/2021	FORT BEND	3807
3808	VOC	10.40	ERC_USE	09/13/2021	12/31/2016	12/31/2021	MONTGOMERY	3808
3837	VOC	1.30	ERC_INTEN	10/26/2021	07/25/2017	07/25/2022	BRAZORIA	3817
3840	VOC	6.60	ERC_BUY	10/26/2021	01/29/2019	01/29/2025	HARRIS	3820
3843	VOC	3.40	ERC_USE	10/26/2021	01/31/2017	01/31/2022	HARRIS	3544
3872	VOC	0.10	ERC_RET	10/20/2021	02/04/2017	02/04/2022	GALVESTON	3872
3873	VOC	3.30	ERC_USE	10/20/2021	02/19/2017	02/19/2022	GALVESTON	3873
3873	VOC	3.30	ERC_BUY	10/20/2021	02/19/2017	02/19/2022	GALVESTON	3873
3917	VOC	3.50	ERC_USE	10/26/2021	05/07/2020	05/07/2026	LIBERTY	3849
3918	VOC	2.60	ERC_INTEN	08/29/2023	05/07/2020	05/07/2026	LIBERTY	3849
4090	VOC	6.70	ERC_USE	02/28/2023	10/16/2019	10/16/2024	HARRIS	3946
2628	VOC	8.00	ERC_BUY	05/12/2016	06/22/2012	06/22/2017	HARRIS	2622
2628	VOC	8.00	ERC_SELL	05/12/2016	06/22/2012	06/22/2017	HARRIS	2622
2708	VOC	14.30	ERC_USE	08/07/2017	11/15/2009	11/15/2014	HARRIS	2673
2737	VOC	6.50	ERC_SELL	12/28/2016	01/30/2013	01/30/2018	CHAMBERS	2736
2884	VOC	21.90	ERC_SELL	02/18/2016	11/20/2012	11/20/2017	HARRIS	2871
3038	VOC	15.90	ERC_RET	08/07/2017	05/15/2013	05/15/2018	MONTGOMERY	2735
3123	VOC	6.90	ERC_RET	10/27/2017	08/28/2015	08/28/2020	MONTGOMERY	3040
3491	VOC	4.00	ERC_BUY	07/12/2021	11/11/2014	11/11/2019	GALVESTON	2862
3570	VOC	1.00	ERC_USE	07/12/2021	11/12/2014	11/12/2019	HARRIS	3492
3661	VOC	0.20	ERC_INTEN	09/30/2021	04/10/2017	04/10/2022	CHAMBERS	3661
3661	VOC	0.20	ERC_USE	09/30/2021	04/10/2017	04/10/2022	CHAMBERS	3661
3799	VOC	1.80	ERC_INTEN	10/07/2021	05/31/2016	05/31/2021	GALVESTON	3463
3802	VOC	0.10	ERC_USE	09/13/2021	05/02/2016	05/02/2021	HARRIS	3802
3805	VOC	0.70	ERC_INTEN	09/13/2021	11/02/2015	11/02/2021	FORT BEND	3805
3839	VOC	8.50	ERC_RET	10/26/2021	10/23/2017	10/23/2022	HARRIS	3819
3841	VOC	29.70	ERC_USE	10/26/2021	12/20/2016	12/20/2021	HARRIS	3588
3847	VOC	1.70	ERC_BUY	10/26/2021	03/16/2020	03/16/2026	HARRIS	3830
3871	VOC	2.70	ERC_USE	10/20/2021	01/19/2017	01/19/2022	GALVESTON	3871
4108	VOC	1.20	ERC_USE	08/29/2023	05/07/2020	05/07/2026	LIBERTY	3918
2638	VOC	10.80	ERC_RET	05/17/2016	11/03/2011	11/03/2016	BRAZORIA	2633
2638	VOC	10.80	ERC_SELL	05/17/2016	11/03/2011	11/03/2016	BRAZORIA	2633
2885	VOC	1.20	ERC_INTEN	08/07/2017	11/12/2014	11/12/2019	HARRIS	2823
2885	VOC	1.20	ERC_USE	08/07/2017	11/12/2014	11/12/2019	HARRIS	2823

2969	VOC	4.40	ERC_SELL	06/30/2016	06/22/2012	06/22/2017	HARRIS	2628
3551	VOC	5.60	ERC_USE	09/30/2021	05/23/2019	05/23/2024	GALVESTON	3546
3570	VOC	1.00	ERC_RET	07/12/2021	11/12/2014	11/12/2019	HARRIS	3492
3581	VOC	1.50	ERC_USE	09/30/2021	10/03/2019	10/03/2024	CHAMBERS	3581
3804	VOC	5.00	ERC_INTEN	09/13/2021	09/26/2016	09/26/2021	HARRIS	3804
3805	VOC	0.70	ERC_BUY	09/13/2021	11/02/2015	11/02/2021	FORT BEND	3805
3807	VOC	3.00	ERC_BUY	09/13/2021	11/02/2015	11/02/2021	FORT BEND	3807
3836	VOC	5.90	ERC_INTEN	10/26/2021	06/15/2017	06/15/2022	BRAZORIA	3836
3848	VOC	3.40	ERC_USE	10/26/2021	04/21/2020	04/21/2026	LIBERTY	3831
3872	VOC	0.10	ERC_INTEN	10/20/2021	02/04/2017	02/04/2022	GALVESTON	3872
3873	VOC	3.30	ERC_RET	10/20/2021	02/19/2017	02/19/2022	GALVESTON	3873
4106	VOC	3.90	ERC_USE	08/29/2023	04/26/2018	04/26/2023	BRAZORIA	3538
2599	VOC	9.80	ERC_INTEN	09/27/2013	03/23/2009	03/23/2014	HARRIS	2543
2611	VOC	11.50	ERC_BUY	09/27/2013	10/04/2011	10/04/2016	BRAZORIA	2602
2708	VOC	14.30	ERC_INTEN	08/07/2017	11/15/2009	11/15/2014	HARRIS	2673
2715	VOC	4.40	ERC_USE	09/27/2013	10/04/2011	10/04/2016	BRAZORIA	2611
2948	VOC	2.40	ERC_SELL	05/17/2016	11/20/2012	11/20/2017	HARRIS	2884
2948	VOC	2.40	ERC_RET	05/17/2016	11/20/2012	11/20/2017	HARRIS	2884
3121	VOC	9.10	ERC_RET	10/27/2017	05/15/2013	05/15/2018	MONTGOMERY	3038
3121	VOC	9.10	ERC_SELL	10/27/2017	05/15/2013	05/15/2018	MONTGOMERY	3038
3122	VOC	70.10	ERC_USE	08/07/2017	08/28/2015	08/28/2020	MONTGOMERY	3040
3165	VOC	6.50	ERC_SELL	11/06/2019	08/28/2015	08/28/2020	MONTGOMERY	3123
3551	VOC	5.60	ERC_BUY	09/30/2021	05/23/2019	05/23/2024	GALVESTON	3546
3801	VOC	2.90	ERC_INTEN	10/07/2021	12/02/2016	12/02/2021	GALVESTON	3465
3804	VOC	5.00	ERC_USE	09/13/2021	09/26/2016	09/26/2021	HARRIS	3804
3806	VOC	4.20	ERC_USE	09/13/2021	11/30/2016	11/30/2021	HARRIS	3806
3807	VOC	3.00	ERC_USE	09/13/2021	11/02/2015	11/02/2021	FORT BEND	3807
3839	VOC	8.50	ERC_BUY	10/26/2021	10/23/2017	10/23/2022	HARRIS	3819
3839	VOC	8.50	ERC_USE	10/26/2021	10/23/2017	10/23/2022	HARRIS	3819
3841	VOC	29.70	ERC_INTEN	10/26/2021	12/20/2016	12/20/2021	HARRIS	3588
3844	VOC	8.40	ERC_USE	10/26/2021	01/29/2019	01/29/2025	HARRIS	3833
3849	VOC	6.10	ERC_BUY	10/26/2021	05/07/2020	05/07/2026	LIBERTY	3832
3849	VOC	6.10	ERC_RET	10/26/2021	05/07/2020	05/07/2026	LIBERTY	3832
3871	VOC	2.70	ERC_INTEN	10/20/2021	01/19/2017	01/19/2022	GALVESTON	3871
4091	VOC	2.00	ERC_INTEN	08/17/2023	10/16/2019	10/16/2024	HARRIS	3946
4106	VOC	3.90	ERC_BUY	08/29/2023	04/26/2018	04/26/2023	BRAZORIA	3538

Form DEC-3 (Page 4)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)
Texas Commission On Environmental Quality

Mail application to:

**Texas Commission on Environmental Quality
Emission Banking and Trading Program MC-163
PO BOX 13087
AUSTIN, TX 78711-3087**

I. Company Identifying Information
A. Company Name: Enterprise Products Operating LLC
Mailing Address: P.O. Box 4324
City: Houston
State: TX
ZIP Code: 77210
Telephone Number: 713-381-6595
Fax Number:
B. TCEQ Customer Number (CN): 603211277
C. Site Name: Mont Belvieu Complex
Street Address: (If no street address, give driving directions to site)
10207 FM 1942
Nearest City: Mont Belvieu
ZIP Code: 77580
County: Chambers
D. TCEQ Regulated Entity Number (RN): RN102323268
E. TCEQ Air Account Number: <i>(if applicable)</i> CI-0008-R
F. Primary SIC: 2869
Air Permit Number: 107523

Form DEC-3 (Page 2)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)
Texas Commission On Environmental Quality

II. Technical Contact Identifying Information
A. Technical Contact Name: (Mr. ☐ Mrs. ☐ Ms. ☒ Dr. <input #d3d3d3;"="" background-color:="" type="checkbox/>)</td></tr><tr><td>Full Name: Beatriz Santamaria</td></tr><tr><td>Technical Contact Title: Staff Environmental Engineer</td></tr><tr><td>Mailing Address: P.O. Box 4324</td></tr><tr><td>City: Houston</td></tr><tr><td>State: Texas</td></tr><tr><td>ZIP Code: 77210</td></tr><tr><td>Telephone Number: 713-381-4308</td></tr><tr><td>Fax Number:</td></tr><tr><td>Email Address: besantamaria@eprod.com</td></tr><tr><td style="/> III. Company Contact Identifying Information (If different from Technical Contact)
A. Company Contact Name: (Mr. ☐ Mrs. ☐ Ms. ☐ Dr. <input #d3d3d3;"="" background-color:="" type="checkbox/>)</td></tr><tr><td>Full Name:</td></tr><tr><td>Company Contact Title:</td></tr><tr><td>Mailing Address:</td></tr><tr><td>City:</td></tr><tr><td>State:</td></tr><tr><td>ZIP Code:</td></tr><tr><td>Telephone Number:</td></tr><tr><td>Fax Number:</td></tr><tr><td>Email Address:</td></tr><tr><td style="/> IV. Mass Emission Cap and Trade Program (MECT)
Is the DERC use for compliance with 30 TAC Chapter 101 Subchapter H, Division 3? ☐ Yes ☒ No
Year DERC Generated:
Year of Use:
Ratio of DERC to Allowance:
<i>Note: If DERC use is to comply with MECT then go to Section IX</i>

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

V. Intended Use Period
Intended Use Start Date: December 15, 2022
Intended Use End Date: December 15, 2023
VI. State and Federal Requirements
Applicable State and Federal requirements that the DERCs will be used for compliance:
MAERT Annual emission limit of 8.25 tpy NO _x and 3.1 tpy VOC, based on a 12 month rolling period
VII. Most Stringent Emission Rate
Describe basis for most stringent allowable emission rate:
☒ Permit: 107253
☐ RACT:
☐ Other:
Notes:
VIII. Protocol
Protocol used to calculate DERC: see attached
Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form.

Form DEC-3 (Page 4)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)
Texas Commission On Environmental Quality

IX. Tons of DERCS Required

Calculation of DERCs

Emission Point No.	FIN	Air Contaminant	Expected Activity (units)	Expected Emission Rate (units)	Expected Total Emissions (tons)	Regulated Activity (units)	Regulated Emission Rate (units)	Regulated Total Emissions (tons)	DERCs (tons)
SK25.801	SK25.801	VOC	5,191 tons/yr	99.9% DRE	5.2	3,100 tons/yr	99.9% DRE	3.1	2.09
SK25.801	SK25.801	NOX	544,024.24 MMBtu/yr	0.05 lb/MMBtu	13.6	330,000 MMBtu/yr	0.05 lb/MMBtu	8.25	5.35
								Total:	

Form DEC-3 (Page 5)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)
Texas Commission On Environmental Quality

X. Total DERCS Required for Use (round up to the nearest tenth of a ton)
Tons of DERCS required (from Section VII.)
CO:
NO _x : 5.4
PM ₁₀ :
SO ₂ :
VOC: 2.1
Offset Ratio (if required)
CO:
NO _x :
PM ₁₀ :
SO ₂ :
VOC:
Environmental Contribution (+ 10%)
CO:
NO _x :.0.54
PM ₁₀ :
SO ₂ :
VOC: 0.21
Compliance Margin (+ 5%) <i>(If DERC use requires >10 tons)</i>
CO:
NO _x :
PM ₁₀ :
SO ₂ :
VOC:
Total DERCS
CO:
NO _x :5.9
PM ₁₀ :
SO ₂ :
VOC:2.3

Form DEC-3 (Page 6)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)
Texas Commission On Environmental Quality

XI. DERC Information
Name of the DERC Generator: Enterprise Products Operating LLC
DERC Generator Regulated Entity Number: RN102323268
Certificate number of the DERCs acquired or to be acquired: D3615 (NOX) and D3527 (VOC)
Date on which the DERCs were acquired or will be acquired: 10/20/2022 (D3615) and 2/11/2021 (D3527)
Note: The certificate number is assigned by the TCEQ.
XII. Purchase Date Price
Date Purchase or date of generation of the DERC certificate: 10/20/2022 (D3615) and 2/24/2021 (D3527)
Price or Expected Price: \$0 (internal trade)
Generator Price:
XIII. Certification by Responsible Official
I, <u>Bradley J. Cooley</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 regard to the generation and use of discrete emission credits.
Signature: 
Signature Date: 3/8/2024
Title: Senior Director



ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

March 8, 2024

Emissions Banking and Trading Program
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

STEERS Submittal

**RE: Propane Dehydrogenation Unit (PDH Unit) Permit No. 107523
Mont Belvieu Complex, RN102323268
Mont Belvieu, Chambers County
Enterprise Products Operating LLC, CN603211277
Notice of Use of Discrete Emission Credits (Form DEC-3)**

Dear Sir or Madam:

Enterprise Products Operating LLC (Enterprise) is submitting the enclosed Form DEC-3, as provided in 30 TAC §101.376(e), to update the notice of intent to use for the use of discrete emission credits (DERCs) for the ground flare (Emission Point Number [EPN] SK25.801), TCEQ Project No. 417506.

This application and attachments are being submitted within 90 days after the end of the use period. Additional information on how this project complies with 30 TAC §101.376(e) is included herein.

Should you have questions, please contact me at (713) 381-4308 or by email at besantamaria@eprod.com or Daniel Bissonnette at (713) 381-3669.

Sincerely,
Enterprise Products Operating LLC

Beatriz Santamaria, P.E.
Staff Environmental Engineer

Daniel Bissonnette
Supervisor, Environmental Permitting

/bjm

Attachment A. DERC Calculation

Emission Increases

The table below includes the current permitted emissions for the ground flare (EPN SK25.801) and the NO_x and VOC DERCs used based on an incremental increase approach.

Pollutant	Current Limit (tpy)	DERCS Used (tons)	DERCS Used (tons) (round up)
VOC	3.1	2.09	2.1
NO _x	8.25	5.35	5.4

In the incremental increase approach, compliance with the 12-month rolling period is calculated at the end of each month. The amount of DERCs required in each month that the MAERT limit was exceeded are rolled to the next month to establish the new rolling 12-month average and additional DERCs required. The calculations are included at the end of this attachment.

Per 30 TAC §101.376(d)(2)(D), an additional 10% DERCs must be also purchased and retired to meet the environmental contribution requirements.

- The total VOC DERCs with a 10% environmental contribution of 0.2 tons, is 2.3 tons of VOC. Of the 5.5 tons set aside from certificate D3527 with TCEQ Project No. 417506, 3.2 tons will remain available for future use.
- The total NO_x DERCs with a 10% environmental contribution of 0.5 tons, is 5.9 tons of NO_x. Of the 11 tons set aside from certificate D3615 with TCEQ Project No. 417506, 5.1 tons will remain available for future use.

NO _x NSR limit	8.25
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Month/Year	NO _x Monthly Emissions (tons) [1]	12 month rolling NO _x (Calculated w/out DERC) (tpy) [2]	12 Month Rolling Period	Monthly Incremental DERCs Used to Authorize Excess Emissions [3]
22-Jan	1.51	--	--	--
22-Feb	0.80	--	--	--
22-Mar	1.34	--	--	--
22-Apr	0.41	--	--	--
22-May	0.47	--	--	--
22-Jun	0.58	--	--	--
22-Jul	1.56	--	--	--
22-Aug	1.13	--	--	--
22-Sep	0.71	--	--	--
22-Oct	1.47	--	--	--
22-Nov	0.37	--	--	--
22-Dec	1.55	11.89	1/1/2022 - 12/31/2022	3.64
23-Jan	2.26	12.64	2/1/2022 - 1/31/2023	0.75
23-Feb	1.75	13.60	3/1/2022 - 2/28/2023	0.96
23-Mar	0.20	12.46	4/1/2022 - 3/31/2023	---
23-Apr	0.26	12.32	5/1/2022 - 4/30/2023	---
23-May	0.48	12.32	6/1/2022 - 5/31/2023	---
23-Jun	0.90	12.65	7/1/2022 - 6/30/2023	---
23-Jul	1.18	12.26	8/1/2022 - 7/31/2023	---
23-Aug	0.38	11.51	9/1/2022 - 8/31/2023	---
23-Sep	0.28	11.08	10/1/2022 - 9/30/2023	---
23-Oct	0.90	10.52	11/1/2022 - 10/31/2023	---
23-Nov	0.21	10.35	12/1/2022 - 11/30/2023	---
23-Dec	0.42	9.23	1/1/2023 - 12/31/2023	---
Total DERCs [4]				5.35

[1] Based on CEMS data.

[2] Rolling 12-month emissions.

[3] The amount of DERCs required in each month that the MAERT limit was exceeded are rolled to the next month to establish the new rolling 12-month average and additional DERCs required.

12 month rolling NO_x (Calculated w/out DERC) - [DERCs used in previous months (> 0 tpy) + NSR Permit Limit (tpy)]

December 2022: 11.89 tpy - [0 + 8.25 tpy] = 3.64 tpy

January 2023: 12.64 tpy - [3.64 tpy + 8.25 tpy] = 0.75 tpy

February 2023: 13.60 tpy - [3.64 tpy + 0.75 tpy + 8.25 tpy] = 0.96 tpy

[4] Total DERCs calculated using values greater than 0.

VOC NSR limit	3.1
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Month/Year	VOC Monthly Emissions (tons) [1]	12 month rolling VOC (Calculated w/out DERC) (tpy) [2]	12 Month Rolling Period	Monthly Incremental DERCs Used to Authorize Excess Emissions [3]
22-Jan	0.43	--	--	--
22-Feb	0.09	--	--	--
22-Mar	0.11	--	--	--
22-Apr	0.10	--	--	--
22-May	0.07	--	--	--
22-Jun	0.12	--	--	--
22-Jul	0.14	--	--	--
22-Aug	0.10	--	--	--
22-Sep	0.06	--	--	--
22-Oct	0.21	--	--	--
22-Nov	0.11	--	--	--
22-Dec	0.32	1.86	1/1/2022 - 12/31/2022	---
23-Jan	1.18	2.62	2/1/2022 - 1/31/2023	---
23-Feb	0.86	3.39	3/1/2022 - 2/28/2023	0.29
23-Mar	0.06	3.34	4/1/2022 - 3/31/2023	---
23-Apr	0.10	3.33	5/1/2022 - 4/30/2023	---
23-May	0.16	3.42	6/1/2022 - 5/31/2023	0.03
23-Jun	0.47	3.78	7/1/2022 - 6/30/2023	0.35
23-Jul	0.81	4.44	8/1/2022 - 7/31/2023	0.67
23-Aug	0.04	4.38	9/1/2022 - 8/31/2023	---
23-Sep	0.57	4.89	10/1/2022 - 9/30/2023	0.45
23-Oct	0.51	5.19	11/1/2022 - 10/31/2023	0.30
23-Nov	0.04	5.12	12/1/2022 - 11/30/2023	---
23-Dec	0.22	5.02	1/1/2023 - 12/31/2023	---
Total DERCs [4]				2.09

[1] Based on CEMS data.

[2] Rolling 12-month emissions.

[3] The amount of DERCs required in each month that the MAERT limit was exceeded are rolled to the next month to establish the new rolling 12-month average and additional DERCs required.

12 month rolling VOC (Calculated w/out DERC) - [DERCs used in previous months (> 0 tpy) + NSR Permit Limit (tpy)]

February 2023: 3.39 tpy - [0 + 3.1 tpy] = 0.29 tpy

March 2023: 3.34 tpy - [0.29 + 3.1 tpy] = -0.05 tpy

April 2023: 3.33 tpy - [0.29 + 3.1 tpy] = -0.06 tpy

[4] Total DERCs calculated using values greater than 0.

Attachment B. TCEQ Form

Emission Sources - Maximum Allowable Emission Rates

Permit Numbers 107523, PSDTX1336, and N174M2

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
COMBCAP	Combustion Unit Cap Includes (8) HR15.101 DW37.101 BO10.103A BO10.103B	NO _x	---	110.21
		SO ₂	33.84	135.22
		NH ₃	---	127.27
		H ₂ SO ₄	---	41.41
COMBCAP2	Combustion Cap Includes (9) HR15.101 BO10.103A BO10.103B	CO	---	106.49
		VOC	---	6.26
		PM	---	17.14
		PM ₁₀	---	17.14
		PM _{2.5}	---	17.14
HR15.101	Reactor Charge Heater (8)(9)	NO _x	9.74	21.34
		CO	38.32	83.92
		VOC	0.97	4.27
		PM	5.85	15.90
		PM ₁₀	5.85	15.90
		PM _{2.5}	5.85	15.90
		SO ₂	25.45	111.48
		NH ₃	2.20	9.65
		H ₂ SO ₄	7.80	34.14
	MSS (6)(10)	VOC	1.95	---
		NO _x	15.59	---

Emission Sources - Maximum Allowable Emission Rates

DW37.101	Waste Heat Boiler, Waste Heat Boiler Burner, HR15.103, Regeneration Air Heater, HR15.102, Regen Air Comp. Gas Turbine A, GT26.101A, Regen Air Comp. Gas Turbine B, GT26.101B (8)	NO _x	37.53	75.74
		CO	87.84	178.83
		VOC	18.76	83.09
		PM	33.06	78.91
		PM ₁₀	33.06	78.91
		PM _{2.5}	33.06	78.91
		SO ₂	36.71	55.54
		NH ₃	31.18	117.09
		H ₂ SO ₄	11.24	34.61
	MSS (6)(10)	VOC	43.76	---
GT26.101A	Turbine A Bypass Stack (7)	CO	90.00	---
		NO _x	67.50	---
		NO _x	43.51	1.47
		CO	152.98	0.79
		VOC	3.97	0.05
		PM	3.00	0.18
		PM ₁₀	3.00	0.18
GT26.101B	Turbine B Bypass Stack (7)	PM _{2.5}	3.00	0.18
		SO ₂	0.88	0.04
		NO _x	43.51	1.47
		CO	152.98	0.79
		VOC	3.97	0.05
		PM	3.00	0.18
		PM ₁₀	3.00	0.18
		PM _{2.5}	3.00	0.18
		SO ₂	0.88	0.04

Emission Sources - Maximum Allowable Emission Rates

BO10.103A	Auxiliary Boiler A (8)(9)	NO _x	4.31	---
		CO	31.89	---
		VOC	3.45	---
		PM	2.16	---
		PM ₁₀	2.16	---
		PM _{2.5}	2.16	---
		SO ₂	24.84	---
		NH ₃	1.95	---
		H ₂ SO ₄	7.61	---
	MSS (10)	NO _x	10.50	---
BO10.103B	Auxiliary Boiler B (8)(9)	NO _x	4.31	---
		CO	31.89	---
		VOC	3.45	---
		PM	2.16	---
		PM ₁₀	2.16	---
		PM _{2.5}	2.16	---
		SO ₂	24.84	---
		NH ₃	1.95	---
		H ₂ SO ₄	7.61	---
	MSS (10)	NO _x	10.50	---
BO10.103A BO10.103B	Auxiliary Boiler A Auxiliary Boiler B Annual Caps (8)(9)	NO _x	---	21.24
		CO	---	59.58
		VOC	---	10.77
		PM	---	6.73
		PM ₁₀	---	6.73
		PM _{2.5}	---	6.73
		SO ₂	---	7.87
		NH ₃	---	5.87
		H ₂ SO ₄	---	2.41
CT13.801	Cooling Tower (5)	PM	2.53	6.33
		PM ₁₀	1.73	4.77
		PM _{2.5}	0.67	1.95
		VOC	2.81	6.16
SK25.801	Process Flare Routine Hourly Rates	NO _x	22.62	---
		SO ₂	0.54	---
		CO	117.33	---

Emission Sources - Maximum Allowable Emission Rates

	Process Flare MSS (10) Hourly Rates	VOC	10.31	---
		NO _x	144.57	---
		SO ₂	0.78	---
		CO	754.01	---
		VOC	81.35	---
	Process Flare Annual Rates	NO _x	---	8.25
		SO ₂	---	0.13
		CO	---	42.54
		VOC	---	3.1
PM18.803	Fire Water Pump Engine	NO _x	2.53	0.07
		CO	4.01	0.10
		VOC	2.10	0.05
		PM	0.23	<0.01
		PM ₁₀	0.23	<0.01
		PM _{2.5}	0.23	<0.01
		SO ₂	0.01	<0.01
GEN001	PCR001 Emergency Generator Engine	NO _x	4.41	0.11
		CO	6.99	0.18
		VOC	3.66	0.10
		PM	0.40	0.01
		PM ₁₀	0.40	0.01
		PM _{2.5}	0.40	0.01
		SO ₂	0.01	<0.01
GEN002	PCR004 Emergency Generator Engine	NO _x	4.41	0.11
		CO	6.99	0.18
		VOC	3.66	0.10
		PM	0.40	0.01
		PM ₁₀	0.40	0.01
		PM _{2.5}	0.40	0.01
		SO ₂	0.01	<0.01
GEN003	Control Room Emergency Generator Engine	NO _x	2.75	0.07
		CO	4.37	0.11
		VOC	2.29	0.06
		PM	0.25	<0.01
		PM ₁₀	0.25	<0.01
		PM _{2.5}	0.25	<0.01

Emission Sources - Maximum Allowable Emission Rates

		SO ₂	0.01	<0.01
LOAD-PDH	Truck Loading Line Disconnect Losses	VOC	<0.01	<0.01
UNLD-PDH	Truck Unloading Line Disconnect Losses	VOC	0.01	<0.01
FUG-PDH	Process Fugitives (5)	VOC	3.47	15.19
FUG-NGAS	Nat. Gas Pipeline Fugitives (5)	VOC	0.14	0.61
FUG-SCR	SCR Ammonia Fugitives (5)	NH ₃	0.01	0.06
MSS-PDH	Maintenance, Startup, Shutdown Cap	VOC	21.11	0.51
CATMSS1	Catalyst Blending Filter Vent	PM	0.02	<0.01
		PM ₁₀	0.02	<0.01
		PM _{2.5}	0.02	<0.01
CATMSS2	Catalyst Loading Fugitive	PM	0.03	<0.01
		PM ₁₀	0.01	<0.01
		PM _{2.5}	<0.01	<0.01
CATMSS3	Catalyst Loading Filter Vents	PM	0.01	<0.01
		PM ₁₀	0.01	<0.01
		PM _{2.5}	0.01	<0.01
CATMSS4	Catalyst Unloading Filter Vents	PM	0.04	0.01
		PM ₁₀	0.04	0.01
		PM _{2.5}	0.04	0.01
CATMSS5	Catalyst Separation Filter Vent	PM	0.02	<0.01
		PM ₁₀	0.02	<0.01
		PM _{2.5}	0.02	<0.01
FL20.103	Catalyst De-dusting Filter Vent	PM	3.40	0.01
		PM ₁₀	0.99	<0.01
		PM _{2.5}	0.55	<0.01
WWT	Wastewater Treatment Facilities	VOC	0.22	0.95
SV19.901	Wastewater Equalization Tank	VOC	0.01	0.04
SV19.610	Sludge Holding Tank	VOC	0.01	0.04
SV19.842	FWP Diesel Tote	VOC	0.01	0.04
SV19.841	Methanol Tote	VOC	0.01	0.04

Emission Sources - Maximum Allowable Emission Rates

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO_x - total oxides of nitrogen
SO₂ - sulfur dioxide
H₂SO₄ - sulfuric acid
PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
CO - carbon monoxide
NH₃ - ammonia
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Annual MSS emissions are included in the annual routine allowable rate for this EPN.
- (7) Annual emissions are sub-caps of the annual allowable rate for EPN DW37.101.
- (8) The annual combined NO_x, SO₂, NH₃, H₂SO₄ emissions from Emission Point Nos. HR15.101, DW37.101, BO10.103A, BO10.103B are limited per the annual emissions CAP for each pollutant listed.
- (9) The annual combined CO, VOC, PM, PM₁₀, and PM_{2.5} emissions from Emission Point Nos. HR15.101, BO10.103A, and BO10.103B are limited per the annual emissions CAP for each pollutant listed.
- (10) Contaminants for this EPN not specifically listed in MSS are limited to their respective routine short-term (lb/hr) emission rates.

Date: July 7, 2022

From: [Emily Furlong](#)
To: [Kulkarni, Pranav](#)
Cc: [Bissonnette, Daniel](#); ENVIRONMENTAL@EPROD.COM; WTJACOBSON@EPROD.COM; JEFIELDS@EPROD.COM; [Benton, Christopher](#); CRPARMLEY@EPROD.COM
Subject: RE: Notification of Environmental Contribution for DERC Use 418726
Date: Monday, April 8, 2024 9:58:00 AM

Good Morning Pranav,

I wanted to send a final update on the use values associated with DERC Use project 418726. Based on the added environmental contribution and DERC rounding rules, 6.0 tons of NOX and 2.4 tons of VOC credits will be Used.

Please let me know if you have any questions or concerns! Otherwise, no further action will be needed.

Thanks,
Emily

From: Emily Furlong
Sent: Monday, March 25, 2024 10:16 AM
To: Kulkarni, Pranav <PKULKARNI@EPROD.COM>
Cc: Bissonnette, Daniel <dmbissonnette@eprod.com>; ENVIRONMENTAL@EPROD.COM; WTJACOBSON@EPROD.COM; JEFIELDS@EPROD.COM; Benton, Christopher <CRBENTON@EPROD.COM>; CRPARMLEY@EPROD.COM
Subject: Notification of Environmental Contribution for DERC Use 418726

Good Morning Pranav,

This email is in response to the Notice of Use of Discrete Emissions Credits (EBT Project 418726) application submitted on 3/8/2024.

Per 30 Texas Administrative Code (TAC) 101.376(d)(2)(D), a 10% environmental contribution is to be retired for the use of Discrete Emissions Reduction Credits. According to this regulation, an additional 0.5 ton of NOX and 0.2 ton of VOC credits will be retired in association with this project. These values were calculated based on the reported 5.4 tons of NOX and 2.1 tons of VOC credits used.

If you have any questions or concerns, please let me know. Otherwise, no further action is needed at this time.

Thanks,
Emily

Emily Furlong

Emissions Banking and Trading
Texas Commission on Environmental Quality
Email: Emily.Furlong@tceq.texas.gov

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Select *Emissions Banking and Trading (EBT) Programs* under the *Air Quality* heading

From: [Santamaria, Beatriz](#)
To: [Melissa Ruano](#); [Daniel Menendez](#); [Rebecca Partee](#); [Emily Furlong](#)
Cc: [Kulkarni, Pranav](#); [Bissonnette, Daniel](#)
Subject: RE: [EXTERNAL] STEERS EBT DERC Use Submitted
Date: Friday, March 15, 2024 10:46:52 AM

Hi Melissa,

Monday will be my last day with Enterprise. Going forward, Pranav and Dan will be handling this project. They are copied on this email.

Thanks,
Beatriz
O: 713-381-4308
M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Sent: Friday, March 8, 2024 9:15 AM
To: Santamaria, Beatriz <besantamaria@eprod.com>; Daniel Menendez <daniel.menendez@tceq.texas.gov>; Rebecca Partee <rebecca.partee@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: RE: [EXTERNAL] STEERS EBT DERC Use Submitted

[Use caution with links/attachments]

Good Morning,

Thank you for the heads up. We will assign the project and will notify you if there are any questions.

Sincerely,

Melissa Ruano

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

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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From: Santamaria, Beatriz <besantamaria@eprod.com>

Sent: Friday, March 8, 2024 9:10 AM

To: Melissa Ruano <melissa.ruano@tceq.texas.gov>; Daniel Menendez <daniel.menendez@tceq.texas.gov>; Rebecca Partee <rebecca.partee@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: FW: [EXTERNAL] STEERS EBT DERC Use Submitted

Melissa,

Just wanted to give you a heads up that the DERCs DEC-3 Form was submitted today through STEERS. See attached the supporting documentation that was included with the submittal. Let us know if you have any questions.

Thanks,
Beatriz
O: 713-381-4308
M: 713-859-3754

-----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Friday, March 8, 2024 8:42 AM
To: Cooley, Bradley <bjcooley@eprod.com>
Cc: Environmental Dept - Corporate <environmental@eprod.com>; Sartor, Rodney <RMSARTOR@eprod.com>; Parmley, Charles <CRParmley@eprod.com>; Jacobson, Tucker <WTJACOBSON@eprod.com>; Fields, Jon <JEFIELDS@eprod.com>; Santamaria, Beatriz <besantamaria@eprod.com>
Subject: [EXTERNAL] STEERS EBT DERC Use Submitted

[Use caution with links/attachments]

This confirms the submittal of your EBT DERC Use to the TCEQ. Your submittal was received at 03/08/2024.

Portfolio Number: 3271
Project Number: 418726
Confirmation Number: 16632
Hash Code: AF506ACF4C8C94AD9E4BF97D3CCEE435EED057B291852F929460FDD2D1BF75C5

You may view the copy of record for this submission from the STEERS Home page.

1. Login to STEERS at
[https://urldefense.com/v3/_https://www3.tceq.texas.gov/steers/_;!!AT8jIA!_CIIGSFIZNiGYvDHJINGMzU4cDTin1Wl1fGblZV6LJcFwep4jNwshYvITVc-zrFtewkUgzkGzIt5s6qP4pX0Yag\\$](https://urldefense.com/v3/_https://www3.tceq.texas.gov/steers/_;!!AT8jIA!_CIIGSFIZNiGYvDHJINGMzU4cDTin1Wl1fGblZV6LJcFwep4jNwshYvITVc-zrFtewkUgzkGzIt5s6qP4pX0Yag$) .
2. Press Submissions button in the navigation menu.
3. Select program area EBT and enter your confirmation number.
4. Press Search.

5. Click the link to view the copy of record.

If you have any questions please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.texas.gov.

This message (including any attachments) is confidential and intended for a specific individual and purpose. If you are not the intended recipient, please notify the sender immediately and delete this message.

From: [Melissa Ruano](#)
To: [Santamaria, Beatriz](#); [Daniel Menendez](#); [Rebecca Partee](#); [Emily Furlong](#)
Cc: [Kulkarni, Pranav](#); [Bissonnette, Daniel](#); jsaitas@westcapitol.com
Subject: RE: TCEQ Project Number 417506
Date: Monday, March 4, 2024 9:02:00 AM

Good Morning,

Thank you for your consideration while we evaluated this issue. We have reviewed the strategy used in TCEQ Project Number 417506 with management and agree that it is acceptable. The amount of DERCs required in each month that the MAERT limit was exceeded may “roll” to the next month to establish the new rolling 12-month average and additional DERCs required. The amount of DERCs required must still be evaluated for each month, not only for the month of highest exceedance.

Please let us know if you have additional questions or require assistance with the Notice of DERC Use application.

Sincerely,

Melissa Ruano

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

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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From: Santamaria, Beatriz <besantamaria@eprod.com>
Sent: Thursday, February 15, 2024 2:52 PM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>; Daniel Menendez <daniel.menendez@tceq.texas.gov>; Rebecca Partee <rebecca.partee@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>; jsaitas@westcapitol.com
Subject: RE: TCEQ Project Number 417506

Thanks for taking the time meeting with us today. We did some research on previous projects and found the approved TCEQ Project No. 414502 (attached), where NOx DERCs were used for complying with a rolling 12 month period. If you look at page 15 of the pdf, an incremental approach was used to determine the total amount of DERCs needed for the use period. Basically, subtracting DERCs used in the previous 11 months repeated in the 12-month rolling

period for each month in the use period. Based on the TRV, the DERCs approved for use covered the whole use period and not just one month of exceedance. Was this what you were discussing today as what has been accepted in the past?

Thanks,
Beatriz
O: 713-381-4308
M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Sent: Monday, February 12, 2024 8:51 AM
To: Santamaria, Beatriz <besantamaria@eprod.com>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>; Daniel Menendez <daniel.menendez@tceq.texas.gov>
Subject: [EXTERNAL] RE: TCEQ Project Number 417506

[Use caution with links/attachments]

Good Morning,

Yes, 9 am will work. I will send out the appointment shortly.

Thank you!

Sincerely,

Melissa Ruano

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

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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

From: Santamaria, Beatriz <besantamaria@eprod.com>
Sent: Monday, February 12, 2024 8:42 AM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>; Daniel Menendez <daniel.menendez@tceq.texas.gov>
Subject: RE: TCEQ Project Number 417506

Melissa,

Can we do have the call at 9am?

Thanks,

Beatriz

O: 713-381-4308

M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>

Sent: Monday, February 12, 2024 8:23 AM

To: Santamaria, Beatriz <besantamaria@eprod.com>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>; Daniel Menendez <daniel.menendez@tceq.texas.gov>

Subject: [EXTERNAL] RE: TCEQ Project Number 417506

[Use caution with links/attachments]

Good Morning Beatriz,

This message is in follow up to our discussion relating to Discrete Emission Credit (DERC) Use.

We are available to meet with you virtually via Microsoft Teams on Thursday, February 15 at 9:30 AM. If this date and time works for you, please let me know I will complete the necessary arrangements.

Thank you for your understanding and patience during our evaluation of this issue.

Sincerely,

Melissa Ruano

Emissions Banking and Trading Program Team Leader

Texas Commission on Environmental Quality

Air Permits Division

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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

From: Santamaria, Beatriz <besantamaria@eprod.com>

Sent: Monday, February 5, 2024 4:11 PM

To: Melissa Ruano <melissa.ruano@tceq.texas.gov>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>

Subject: RE: TCEQ Project Number 417506

Melissa,

Following up. Where you able to talk to your manager? If so, let us know when can we give you a call to discuss.

Thanks,

Beatriz

O: 713-381-4308

M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>

Sent: Thursday, February 1, 2024 1:56 PM

To: Santamaria, Beatriz <besantamaria@eprod.com>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>

Subject: [EXTERNAL] RE: TCEQ Project Number 417506

[Use caution with links/attachments]

Good Afternoon Beatriz,

Thank you for our call yesterday and for reaching out this afternoon. We have been discussing Enterprise's allowable emission limit with air permit staff and I just received some information this afternoon that I would like to run through our manager. Our manager is out of the office this afternoon, he is expected to return tomorrow.

Would it be possible for me to reach out to you after I meet with our manager tomorrow morning to set up a call? I want to make sure that we have fully assessed the new information that has been provided to us before we discuss.

Thank you,

Melissa Ruano

Emissions Banking and Trading Program Team Leader

Texas Commission on Environmental Quality

Air Permits Division

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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From: Santamaria, Beatriz <besantamaria@eprod.com>
Sent: Thursday, February 1, 2024 1:47 PM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: RE: TCEQ Project Number 417506

Melissa,

Would you be available tomorrow at 10am for a call?

Thanks,
Beatriz
O: 713-381-4308
M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Sent: Wednesday, January 31, 2024 11:28 AM
To: Santamaria, Beatriz <besantamaria@eprod.com>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: [EXTERNAL] RE: TCEQ Project Number 417506

[Use caution with links/attachments]

Thank you Beatriz. I will call you at 2:30 pm this afternoon.

From: Santamaria, Beatriz <besantamaria@eprod.com>
Sent: Wednesday, January 31, 2024 11:27 AM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: RE: TCEQ Project Number 417506

Hi Melissa,

2:30 works for me. You can reach me at 713-381-4308.

Thanks,
Beatriz
O: 713-381-4308
M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Sent: Wednesday, January 31, 2024 11:25 AM

To: Santamaria, Beatriz <besantamaria@eprod.com>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>

Subject: [EXTERNAL] RE: TCEQ Project Number 417506

[Use caution with links/attachments]

Good Morning Beatriz,

Would you be available this afternoon at 2:30 pm CST so that I can call you to discuss the DERC calculations? If yes, please provide your preferred phone contact so that I can reach out to you.

Thank you!

Sincerely,

Melissa Ruano

Emissions Banking and Trading Program Team Leader

Texas Commission on Environmental Quality

Air Permits Division

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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From: Melissa Ruano

Sent: Friday, January 26, 2024 4:11 PM

To: Santamaria, Beatriz <besantamaria@eprod.com>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>

Subject: RE: TCEQ Project Number 417506

Good Afternoon Beatriz,

I wanted to provide an update on this item. I have been working with staff to verify your calculation method, but unfortunately we have not been able to complete our evaluation within the time frame we had expected. We should have a response prepared by the early part of this coming week.

I apologize for the delay, thank you for patience and understanding.

Sincerely,

Melissa Ruano

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

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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From: Melissa Ruano

Sent: Tuesday, January 23, 2024 4:23 PM

To: Santamaria, Beatriz <besantamaria@eprod.com>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>

Subject: RE: TCEQ Project Number 417506

Hi Beatriz,

Thank you for this information. We will discuss internally and provide response. We expect to respond by the end of the week.

Sincerely,

Melissa Ruano

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

Office Phone: (512) 239-4496

Email: Melissa.Ruano@tceq.texas.gov

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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: Santamaria, Beatriz <besantamaria@eprod.com>

Sent: Tuesday, January 23, 2024 4:21 PM

To: Melissa Ruano <melissa.ruano@tceq.texas.gov>

Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>

Subject: RE: TCEQ Project Number 417506

Melissa,

Below is the basis for the emission estimates.

1. Rolling 12-month emissions. These are based on the actual monthly emissions from the flare on a 12-month rolling basis. I've only included the rolling emissions for the CY2023.

Month	Emissions (tons)		Rolling 12-Month Emissions (tons)	
	NOx	VOC	NOx	VOC
Jan-22	1.509017	0.425336		
Feb-22	0.795738	0.087327		
Mar-22	1.33685	0.110841		
Apr-22	0.408867	0.101884		
May-22	0.471764	0.073492		
Jun-22	0.579301	0.117071		
Jul-22	1.556744	0.142678		
Aug-22	1.132276	0.104559		
Sep-22	0.709843	0.059689		
Oct-22	1.469892	0.210183		
Nov-22	0.3719	0.113679		
Dec-22	1.550388	0.316272	11.89258	1.86301
Jan-23	2.259752	1.183519	12.64332	2.621193
Feb-23	1.753029	0.857052	13.60061	3.390918
Mar-23	0.200597	0.059744	12.46435	3.33982
Apr-23	0.263398	0.095872	12.31888	3.333808
May-23	0.475466	0.16106	12.32259	3.421377
Jun-23	0.9023	0.471408	12.64558	3.775715
Jul-23	1.175756	0.811562	12.2646	4.444598
Aug-23	0.381908	0.043311	11.51423	4.38335
Sep-23	0.276482	0.567214	11.08087	4.890875
Oct-23	0.904613	0.51127	10.51559	5.191961
Nov-23	0.208698	0.040757	10.35239	5.119039
Dec-23	0.423677	0.221327	9.225675	5.024094

2. Actual emissions 12/15/2022 – 12/14/2023. This was calculated based on the actual MMBtu/hr burned in the flare from 12/15/2022 to 12/14/2023.

Actual Activity (units) * Emission Rate (units)

(415,723 MMBtu/yr [actual 12-month heat input]) * 0.05 lb/MMBtu (permitted EF for high efficiency flares) * ton/2,000 lb = 10.4 tpy

Thanks,
Beatriz
O: 713-381-4308
M: 713-859-3754

From: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Sent: Tuesday, January 23, 2024 11:57 AM
To: Santamaria, Beatriz <besantamaria@eprod.com>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: [EXTERNAL] RE: TCEQ Project Number 417506

[Use caution with links/attachments]

Good Morning,

Thank you for your email. To answer your question, we will need to review your original Intent to Use (Project 417506) to confirm the appropriate approach.

Do you have available the actual emissions data that you used to develop the table in your email. If you are able to send that information to me, I will discuss internally with staff to produce an answer. If you would allow us to the end of this week to review and respond, we will appreciate it.

Thank you!
Melissa

From: Santamaria, Beatriz <besantamaria@eprod.com>
Sent: Tuesday, January 23, 2024 10:54 AM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Cc: Kulkarni, Pranav <pkulkarni@eprod.com>; Bissonnette, Daniel <dmbissonnette@eprod.com>
Subject: TCEQ Project Number 417506

Melissa,

We spoke a couple of weeks ago about the DERC notice of intent to use that Enterprise will submit in association with TCEQ Project Number 417506. With this project, we proposed to use NOX and VOC DERCs for permit exceedances at the ground flare in the Mont Belvieu Complex for the period from 12/15/2022 – 12/14/2023.

There are two different approaches to estimate the DERCs used to cover emissions from the ground flare as summarized in the table below. The first one is to look at the actual rolling 12-month emissions from the flare and use the highest monthly emissions for the DERCs needed. The second approach is to only look at emissions from the flare during the use period. Since there is a discrepancy on the NOx DERCs needed with both approaches, we are still debating what the appropriate approach is to cover the permit exceedances from the ground flare for that period.

I would like to discuss this with you again, so I will try to give you a call this afternoon.

Pollutant	Max from actual 12 month rolling (tpy)	DERCs Needed (tons)	Actual emissions 12/15/2022 – 12/14/2023 (tpy)	DERCs Needed (tons)
NOx	13.60	5.4	10.39	2.2
VOC	5.19	2.1	5.11	2.1

Thanks,

Beatriz Santamaria, P.E.
Staff Environmental Engineer



1100 Louisiana St
Houston, TX 77002
Office: 713-381-4308
Cellphone: 713-859-3754

This message (including any attachments) is confidential and intended for a specific individual and purpose. If you are not the intended recipient, please notify the sender immediately and delete this message.

From: [Emily Furlong](#)
To: ENVIRONMENTAL@EPROD.COM
Cc: WTJACOBSON@EPROD.COM; CRPARMLEY@EPROD.COM; [Kulkarni, Pranav](#); [Benton, Christopher](#); JEFFIELDS@EPROD.COM
Subject: TCEQ EBT Documents - Use of Discrete Emissions Credits - Enterprise Mont Belvieu Complex
Date: Tuesday, April 9, 2024 9:18:00 AM
Attachments: [418726 DERC Use Letter.pdf](#)

Please see the attached EBT document(s) for project number 418726. 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

ebt@tceq.texas.gov

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From: [APDDIR](#)
To: [Rebecca Partee](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Emily Furlong](#)
Subject: RE: For Review and Approval by 4/10/2024 DERC Use 418726
Date: Tuesday, April 9, 2024 8:15:51 AM

Approved.

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



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From: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Sent: Tuesday, April 9, 2024 7:53 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Subject: FW: For Review and Approval by 4/10/2024 DERC Use 418726

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Monday, April 8, 2024 8:49 AM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Subject: FW: For Review and Approval by 4/10/2024 DERC Use 418726

Please see the attached documents for DERC Use 418726.