

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

July 1, 2024

RANDALL LACK
CHIEF MARKETING OFFICER
ELEMENT MARKETS EMISSIONS LLC
3555 TIMMONS LANE, SUITE 900
HOUSTON, TEXAS 77027
Via email

Subject: ERC Creditability Review
ERC Certificates: 3859, 3860, 3861, 3862, 3863, and 3864
Project Number: 419083

Dear Randall Lack:

This letter is in response to the Application for Creditability Review of Emission Credits submitted on May 1, 2024, requesting review of the nitrogen oxides (NO_x) and emission reduction credits (ERCs) in certificate 3859, 3860, 3861, 3862, 3863, and 3864.

The Texas Commission on Environmental Quality (TCEQ) has determined that as of July 1, 2024, there have been no regulatory changes that decrease the certified amount of ERCs available in certificates 3859, 3860, 3861, 3862, 3863, and 3864. Changes to the representations made in the original ERC application or future regulatory actions could affect the amount of credits available for use in the certificate.

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 Natalie Namba at Natalie.Namba@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.

Samuel Short, Deputy Director
Air Permits Division
Office of Air

cc: Sam Cegielski, Manager, Element Markets Emissions LLC
Senior Project Manager, Houston Department of Health and Human Services, Bureau of Pollution Control & Prevention, Houston
Director, Harris County, Pollution Control Services, Pasadena

Emission Reduction Credit (ERC) Creditability Technical Review

Project Number:	419083	Project Manager:	Natalie Namba
Customer Reference No.:	N/A	Company Name:	Element Markets Emissions LLC
Regulated Entity Reference No.:	N/A	Site Name:	Broker Account - Element Markets Emissions LLC
Portfolio Number:	P3869	County:	Houston

Project Overview

Element Markets Emissions LLC submitted a Creditability Review of Emissions Credits application on May 1, 2024 for the review of ERC Certificate Numbers 3859, 3860, 3861, 3862, 3863, and 3864.

ERC Creditability

Certificate 3859, 0.2 tpy NO_x; Certificate 3860, 0.1 tpy NO_x; Certificate 3861, 0.1 tpy NO_x; Certificate 3862, 0.1 tpy NO_x; Certificate 3863, 0.1 tpy NO_x; Certificate 3864, 0.1 tpy NO_x

GB Biosciences LLC generated 0.2 tons per year (tpy) of nitrogen oxides (NO_x) ERCs on Certificate Number 3859 and 0.1 tpy of NO_x ERCs on each of the following Certificate Numbers 3860, 3861, 3862, 3863, and 3864 from the permanent shutdown of GB Biosciences Greens Bayou Plant (RN100238492) in ERC Generation Project Number 415587. The ERCs on Certificate Numbers 3859, 3860, 3861, 3862, 3863, and 3864 will expire on December 18, 2024, January 16, 2025, March 4, 2025, March 20, 2025, June 24, 2025, and June 30, 2025, respectively.

No previous re-reviews have been conducted on these certificates.

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 Number 415587 and the submission of this creditability review project. Therefore, Certificate Number 3859 still retains the certified amount of 0.2 tpy and the full amount is available. In addition, Certificate Numbers 3860, 3861, 3862, 3863, and 3864 still retain the certified amount of 0.1 tpy each and the full amount is available on each certificate.

Table 1: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All facilities	New Source Review Permit Numbers 234B, 3475A, and 329A	Permits remain voided. Generator submitted two APD-CERTs on 2/25/2021 and 4/26/2021 but neither impacted the credits generated in Project Number 415587.	1/21/2021
All facilities	Title V Federal Operating Permit Numbers 2264, 2265, 2266, and 2267	Permits remain voided.	3/1/2021 2265: 3/12/2021
F3-E5592/GBP006 and U2-H101/GBT004	30 Texas Administrative Code (TAC) Chapter 101, Subchapter H, Division 3 §101.351	The facilities were subject to the Mass Emissions Cap and Trade (MECT) Program. Allowances were surrendered for the affected facilities as required by the program.	6/25/2015

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
F9-D101/GBB001, F6-H0285/GBM027, DO-EMGEN/GBD076, UT-S9P106/GBU035, and UTGA416B/GBU036B	30 TAC Chapter 101, Subchapter H, Division 3 §101.351	These facilities were not applicable to the MECT Program, as they were not subject to the emission specifications for attainment demonstration under 30 TAC §117.310.	5/16/2024
F3-E5592/GBP006 and U2-H101/GBT004	30 TAC Chapter 117, Subchapter B, Division 3 §117.310	The facilities were subject to the emission specifications for attainment demonstration under Chapter 117. The facilities complied with the emission specifications through participation in the MECT Program.	5/16/2024
F9-D101/GBB001	30 TAC Chapter 117, Subchapter B, Division 3 §117.310	The maximum rated capacity of this incinerator is 1.5 million British thermal units per hour (MMBtu/hr). Per §117.303(a)(4)(A), incinerators with a maximum rated capacity less than 40 MMBtu/hr are exempt from §117.310.	6/25/2015
F6-H0285/GBM027	30 TAC Chapter 117, Subchapter B, Division 3 §117.310	The process heater only had a maximum rated capacity of 1 MMBtu/hr. Per §117.303(a)(9), process heaters that have a maximum rated capacity of 2 MMBtu/hr are exempt from §117.310.	6/25/2015
DO-EMGEN/GBD076, UT-S9P106/GBU035, and UTGA416B/GBU036B	30 TAC Chapter 117, Subchapter B, Division 3 §117.310	The engines are stationary diesel engines that were placed into service before 10/1/2001. They operated less than 100 hours per year, based on a rolling 12-month average and were not modified, reconstructed, or relocated on or after 10/1/2001. Therefore, they meet the exemption under §117.303(a)(10) and are not subject to §117.310.	6/25/2015
DO-EMGEN/GBD076, F3-E5592/GBP006, UT-S9P106/GBU035, and UTGA416B/GBU036B	40 Code of Federal Regulations (CFR) Part 60, Subpart IIII §60.4200	The facilities are exempt from this regulation because they were built before 7/11/2005 and have not been modified or reconstructed. Amendments made to the rule did not affect the exemption status of the facilities.	6/29/2021
U2-H101/GBT004	40 CFR Part 60, Subpart Dc §60.40c(a)	The boiler had a maximum rated capacity of 40 MMBtu/hr. It was subject to this subpart as it applies to steam generating units constructed, reconstructed, or modified after 6/9/1989 that have a maximum design heat input capacity of 29 megawatts (MW) (100 MMBtu/hr) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). Complied with the applicable requirements; however, Subpart Dc does not establish any emission standards for NO _x .	2/16/2012
DO-EMGEN/GBD076, F3-E5592/GBP006, UT-S9P106/GBU035, UTGA416B/GBU036B, F6-H0285/GBM027, and F9-D101/GBB001	40 CFR Part 60, Subpart Dc §60.40c(a)	This regulation only applies to steam generating units. None of the facilities listed are steam generating units; therefore, this regulation does not apply.	2/16/2012

Conclusion

As of the submission date of this project, the ERCs on Certificate Numbers 3859, 3860, 3861, 3862, 3863, and 3864 have not devalued.

07/01/2024 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 419083 STATUS: C DISP CODE: _____
RECEIVED: 05/01/2024 PROJTYPE: BERR ISSUED DT: _____
SUP-DISP DATE: 07/01/2024

STAFF ASSIGNED TO PROJECT:
NAMBA, NATALIE

PROJECT NOTES:
.5-6-2024: TO FACILITATE PROCESSING, REQUESTOR AGREED TO SPLIT ERC CREDITABILITY REVIEW 419074 INTO 3 PROJECTS OF 6 CERTIFICATES EACH. THIS PROJECT WAS CREATED INTERNALLY TO MAKE THE SPLIT. FOR THE COR, PLEASE SEE PARENT PROJECT 419074.

PROJECT TRANSACTIONS
COMPANY DATA
COMPANY NAME: ELEMENT MARKETS EMISSIONS LLC
CUSTOMER REGISTRY ID:
PORTFOLIO DATA
NUMBER: P3869 NAME: BKR1071 - ELEMENT MARKETS EMISSIONS LLC
SITE DATA
ACCOUNT: BKR1071
REG ENTITY ID:
SITE NAME: BROKER ACCOUNT - ELEMENT MARKETS EMISSIONS LLC
COUNTY: HOUSTON NEAREST CITY:
LOCATION:

CONTACT DATA
NAME: RANDALL LACK TITLE: CHIEF MARKETING OFFICER
ROLE: AAR
STREET: 3555 TIMMONS LANE, SUITE 900
CITY/STATE,ZIP: HOUSTON, TX , 77027-
PHONE: 281-207-7213 -
EMAIL: RLACK@ELEMENTMARKETS.COM

NAME: SAM CEGIELSKI TITLE: MANAGER
ROLE: AAAR
STREET:
CITY/STATE,ZIP:
PHONE: 281-207-7200 -
EMAIL:
SETTLEMENTSSUPPORT@ANEWCLIMATE.COM

TRANSACTION DATA
TRANSACTION TYPE: ERC_RRVW
DATE ENTERED: 2024-05-06 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: ALL TONS: 0 DOLLARS: 0
ALLOWANCE0 CERTIFICATE NO.: 0 COUNTY : HOUSTON

COMPANY DATA
COMPANY NAME: GB BIOSCIENCES LLC
CUSTOMER REGISTRY ID: CN600132831
PORTFOLIO DATA
NUMBER: P3910 NAME: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492

SITE DATA

ACCOUNT: HG0195U
REG ENTITY ID: RN100238492
SITE NAME: GB BIOSCIENCES GREENS BAYOU PLANT
COUNTY: HARRIS
LOCATION: 2239 HADEN ROAD
NEAREST CITY: HOUSTON

CONTACT DATA

NAME: CHRISTOPHER LEHMANN
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 281-207-7272 -
EMAIL: CLEHMANN@ELEMENTMARKETS.COM
TITLE: DIRECTOR OF GULF COAST EMISSIONS

NAME: KEN RIKE
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 713-248-0145 -
EMAIL: KEN.RIKE@SYNGENTA.COM
TITLE: HSE MANAGER

NAME: JAMES RIKE
ROLE: AAR
STREET: 2239 HADEN ROAD
CITY/STATE, ZIP: HOUSTON, TX , 77015-1111
PHONE: 713-248-0145 -
EMAIL: KEN.RIKE@SYNGENTA.COM
TITLE: REMEDIATION MANAGER

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2024-05-06 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE0
DELETED DATE:
TONS: 0.20
CERTIFICATE NO.: 3859
EFFECTIVE YEAR:
DOLLARS: 0
COUNTY : HARRIS

COMPANY DATA

COMPANY NAME: GB BIOSCIENCES LLC
CUSTOMER REGISTRY ID: CN600132831

PORTFOLIO DATA

NUMBER: P3910 NAME: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492

SITE DATA

ACCOUNT: HG0195U
REG ENTITY ID: RN100238492
SITE NAME: GB BIOSCIENCES GREENS BAYOU PLANT
COUNTY: HARRIS
LOCATION: 2239 HADEN ROAD
NEAREST CITY: HOUSTON

CONTACT DATA

NAME: CHRISTOPHER LEHMANN
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 281-207-7272 -
EMAIL: CLEHMANN@ELEMENTMARKETS.COM
TITLE: DIRECTOR OF GULF COAST EMISSIONS

NAME: KEN RIKE
ROLE: TECHNICAL
STREET:
TITLE: HSE MANAGER

CITY/STATE, ZIP:
PHONE: 713-248-0145 -
EMAIL: KEN.RIKE@SYNGENTA.COM

NAME: JAMES RIKE

ROLE: AAR

STREET: 2239 HADEN ROAD

CITY/STATE, ZIP: HOUSTON, TX , 77015-1111

PHONE: 713-248-0145 -

EMAIL: KEN.RIKE@SYNGENTA.COM

TITLE: REMEDIATION MANAGER

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2024-05-06 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE**0**

DELETED DATE:

TONS: **0.10**

CERTIFICATE NO.: **3860** COUNTY : **HARRIS**

EFFECTIVE YEAR:

DOLLARS: **0**

COMPANY DATA

COMPANY NAME: GB BIOSCIENCES LLC

CUSTOMER REGISTRY ID: CN600132831

PORTFOLIO DATA

NUMBER: P3910 NAME: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492

SITE DATA

ACCOUNT: HG0195U

REG ENTITY ID: RN100238492

SITE NAME: GB BIOSCIENCES GREENS BAYOU PLANT

COUNTY: HARRIS

LOCATION: 2239 HADEN ROAD

NEAREST CITY: HOUSTON

CONTACT DATA

NAME: CHRISTOPHER LEHMANN

ROLE: TECHNICAL

STREET:

CITY/STATE, ZIP:

PHONE: 281-207-7272 -

EMAIL: CLEHMANN@ELEMENTMARKETS.COM

TITLE: DIRECTOR OF GULF COAST EMISSIONS

NAME: KEN RIKE

ROLE: TECHNICAL

STREET:

CITY/STATE, ZIP:

PHONE: 713-248-0145 -

EMAIL: KEN.RIKE@SYNGENTA.COM

TITLE: HSE MANAGER

NAME: JAMES RIKE

ROLE: AAR

STREET: 2239 HADEN ROAD

CITY/STATE, ZIP: HOUSTON, TX , 77015-1111

PHONE: 713-248-0145 -

EMAIL: KEN.RIKE@SYNGENTA.COM

TITLE: REMEDIATION MANAGER

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2024-05-06 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE**0**

DELETED DATE:

TONS: **0.10**

CERTIFICATE NO.: **3861** COUNTY : **HARRIS**

EFFECTIVE YEAR:

DOLLARS: **0**

COMPANY DATA

COMPANY NAME: GB BIOSCIENCES LLC
CUSTOMER REGISTRY ID: CN600132831

PORTFOLIO DATA

NUMBER: P3910 NAME: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492

SITE DATA

ACCOUNT: HG0195U
REG ENTITY ID: RN100238492
SITE NAME: GB BIOSCIENCES GREENS BAYOU PLANT
COUNTY: HARRIS NEAREST CITY: HOUSTON
LOCATION: 2239 HADEN ROAD

CONTACT DATA

NAME: CHRISTOPHER LEHMANN TITLE: DIRECTOR OF GULF COAST EMISSIONS
ROLE: TECHNICAL
STREET:
CITY/STATE,ZIP:
PHONE: 281-207-7272 -
EMAIL: CLEHMANN@ELEMENTMARKETS.COM

NAME: KEN RIKE TITLE: HSE MANAGER
ROLE: TECHNICAL
STREET:
CITY/STATE,ZIP:
PHONE: 713-248-0145 -
EMAIL: KEN.RIKE@SYNGENTA.COM

NAME: JAMES RIKE TITLE: REMEDIATION MANAGER
ROLE: AAR
STREET: 2239 HADEN ROAD
CITY/STATE,ZIP: HOUSTON, TX , 77015-1111
PHONE: 713-248-0145 -
EMAIL: KEN.RIKE@SYNGENTA.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2024-05-06 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX TONS: 0.10 DOLLARS: 0
ALLOWANCE0 CERTIFICATE NO.: 3862 COUNTY : HARRIS

COMPANY DATA

COMPANY NAME: GB BIOSCIENCES LLC
CUSTOMER REGISTRY ID: CN600132831

PORTFOLIO DATA

NUMBER: P3910 NAME: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492

SITE DATA

ACCOUNT: HG0195U
REG ENTITY ID: RN100238492
SITE NAME: GB BIOSCIENCES GREENS BAYOU PLANT
COUNTY: HARRIS NEAREST CITY: HOUSTON
LOCATION: 2239 HADEN ROAD

CONTACT DATA

NAME: CHRISTOPHER LEHMANN TITLE: DIRECTOR OF GULF COAST EMISSIONS
ROLE: TECHNICAL
STREET:
CITY/STATE,ZIP:
PHONE: 281-207-7272 -
EMAIL: CLEHMANN@ELEMENTMARKETS.COM

TITLE: HSE MANAGER

TITLE: REMEDIATION MANAGER

TRANSACTION TYPE: ERC_RET

DELETED DATE:

EFFECTIVE YEAR:

TONS: 0.10

DOLLARS: 0

CERTIFICATE NO.: **3863** COUNTY : **HARRIS**

COMPANY NAME: GB BIOSCIENCES LLC

CUSTOMER REGISTRY ID: CN600132831

NUMBER: P3910 NAME: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492

ACCOUNT: HG0195U

REG ENTITY ID: RN100238492

SITE NAME: GB BIOSCIENCES GREENS BAYOU PLANT

COUNTY: HARRIS

NEAREST CITY: HOUSTON

LOCATION: 2239 HADEN ROAD

NAME: CHRISTOPHER LEHMANN

ROLE: TECHNICAL

TITLE: DIRECTOR OF GULF COAST EMISSIONS

STREET:

CITY/STATE, ZIP:

PHONE: 281-207-7272 -

EMAIL: CLEHMANN@ELEMENTMARKETS.COM

TITLE: HSE MANAGER

TITLE: REMEDIATION MANAGER

TRANSACTION TYPE: ERC RET

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **NOX**
ALLOWANCE**0**

TONS: **0.10** DOLLARS: **0**
CERTIFICATE NO.: **3864** COUNTY : **HARRIS**

TRACKING ACTIVITES

PROJECT SUBMITTED :	05/01/2024	PROJECT RECEIVED BY	05/06/2024	TEAM LEAD REVIEW :	06/21/2024
		PM :			
SECTION MANAGER					
REVIEW :	06/27/2024				

Portfolio Detail

Portfolio Number: P3869
Portfolio Name: BKR1071 - ELEMENT MARKETS EMISSIONS LLC
Company Name: ELEMENT MARKETS EMISSIONS LLC

Actual Allowances for Pollutant NOX

Balance/Year	2020	2021	2022	2023	2024	2025	2026
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>2001.8</u>	<u>2001.8</u>	<u>2001.8</u>	<u>2001.8</u>	<u>2001.8</u>	<u>2001.8</u>	<u>2001.8</u>
Stream Traded Out	<u>-2001.8</u>	<u>-2001.8</u>	<u>-2001.8</u>	<u>-2001.8</u>	<u>-2001.8</u>	<u>-2001.8</u>	<u>-2001.8</u>
Current Traded In	<u>100</u>	<u>500</u>	<u>0</u>	<u>30</u>	<u>50</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-64.6</u>	<u>-23.9</u>	<u>-0</u>	<u>-20.9</u>	<u>-12</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>35.4</u>	<u>476.1</u>	<u>0</u>	<u>9.1</u>	<u>0</u>	<u>0</u>
Vintage Traded In	<u>1100</u>	<u>1000</u>	<u>1500</u>	<u>1500</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded Out	<u>-784</u>	<u>-1029.6</u>	<u>-1814.3</u>	<u>-1276.8</u>	<u>-4.5</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>35.4</u>	<u>476.1</u>	<u>0</u>	<u>9.1</u>	<u>38</u>	<u>0</u>	<u>0</u>
VINTAGE ALLOWANCE BALANCE	<u>316</u>	<u>5.8</u>	<u>161.8</u>	<u>223.2</u>	<u>4.6</u>	<u>0</u>	<u>0</u>

Flexible Allowances for Pollutant NOX

Balance	2020	2021	2022	2023	2024	2025	2026
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	2020	2021	2022	2023	2024	2025	2026
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>

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
3284	NOX	0.30	ERC_SELL	08/27/2018	12/22/2015	12/22/2020	LIBERTY	2971
3293	NOX	1.70	ERC_SELL	08/29/2018	10/10/2013	10/10/2018	HARRIS	3233
3880	NOX	1.40	ERC_SELL	08/05/2021	11/01/2018	11/01/2023	HARRIS	3754
3884	NOX	0.20	ERC_BUY	08/05/2021	08/11/2016	08/11/2022	MONTGOMERY	3789
3282	NOX	0.10	ERC_BUY	08/24/2018	05/19/2015	05/19/2020	BRAZORIA	2977
3284	NOX	0.30	ERC_BUY	08/27/2018	12/22/2015	12/22/2020	LIBERTY	2971
3286	NOX	0.40	ERC_SELL	08/27/2018	12/10/2015	12/10/2020	BRAZORIA	2956
3877	NOX	2.30	ERC_SELL	08/05/2021	01/01/2019	01/01/2024	HARRIS	3730
3886	NOX	0.10	ERC_SELL	08/05/2021	10/01/2018	10/01/2023	LIBERTY	3782
3281	NOX	4.90	ERC_SELL	07/19/2018	07/26/2013	07/26/2018	HARRIS	3245
3283	NOX	0.40	ERC_BUY	08/24/2018	06/12/2015	06/12/2020	GALVESTON	3249
3886	NOX	0.10	ERC_BUY	08/05/2021	10/01/2018	10/01/2023	LIBERTY	3782
3980	NOX	46.80	ERC_SELL	06/13/2022	12/18/2019	12/18/2024	HARRIS	3785
3281	NOX	4.90	ERC_BUY	07/19/2018	07/26/2013	07/26/2018	HARRIS	3245
3282	NOX	0.10	ERC_SELL	08/24/2018	05/19/2015	05/19/2020	BRAZORIA	2977
3283	NOX	0.40	ERC_SELL	08/24/2018	06/12/2015	06/12/2020	GALVESTON	3249
3285	NOX	0.20	ERC_SELL	08/27/2018	01/08/2014	01/08/2020	LIBERTY	3192
3881	NOX	8.60	ERC_BUY	08/05/2021	09/28/2018	09/28/2023	BRAZORIA	3545
3980	NOX	46.80	ERC_BUY	06/13/2022	12/18/2019	12/18/2024	HARRIS	3785
4042	NOX	7.70	ERC_SELL	09/02/2022	12/18/2019	12/18/2024	HARRIS	3981
3285	NOX	0.20	ERC_BUY	08/27/2018	01/08/2014	01/08/2020	LIBERTY	3192
3881	NOX	8.60	ERC_SELL	08/05/2021	09/28/2018	09/28/2023	BRAZORIA	3545
4042	NOX	7.70	ERC_BUY	09/02/2022	12/18/2019	12/18/2024	HARRIS	3981
3286	NOX	0.40	ERC_BUY	08/27/2018	12/10/2015	12/10/2020	BRAZORIA	2956
3293	NOX	1.70	ERC_BUY	08/29/2018	10/10/2013	10/10/2018	HARRIS	3233
3877	NOX	2.30	ERC_BUY	08/05/2021	01/01/2019	01/01/2024	HARRIS	3730
3880	NOX	1.40	ERC_BUY	08/05/2021	11/01/2018	11/01/2023	HARRIS	3754
3884	NOX	0.20	ERC_SELL	08/05/2021	08/11/2016	08/11/2022	MONTGOMERY	3789

Confirm Records to Send to TCEQ

Portfolio Number:P3869
Data current as of:05/01/2024

Project Information

Project Number: 419074
Portfolio Number: P3869
Customer Name: ELEMENT MARKETS EMISSIONS LLC
Customer Reference Number:
Regulated Entity: BROKER ACCOUNT - ELEMENT MARKETS EMISSIONS LLC
Regulated Entity Reference Number:
Account Name: BKR1071

Certification and Submission

Certificate	Pollutant	Expiration Date	Amount Available (tpy)	County	Current Owner
3786	VOC	12/18/2024	0.10	HARRIS	GB BIOSCIENCES LLC
3834	NOX	12/18/2024	0.20	HARRIS	GB BIOSCIENCES LLC
3835	VOC	12/18/2024	1.90	HARRIS	GB BIOSCIENCES LLC
3859	NOX	12/18/2024	0.20	HARRIS	GB BIOSCIENCES LLC
3860	NOX	01/16/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3861	NOX	03/04/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3862	NOX	03/20/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3863	NOX	06/24/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3864	NOX	06/30/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3865	NOX	10/12/2025	0.20	HARRIS	GB BIOSCIENCES LLC
3866	VOC	12/18/2024	2.40	HARRIS	GB BIOSCIENCES LLC
3867	VOC	03/04/2025	0.60	HARRIS	GB BIOSCIENCES LLC
3868	VOC	03/20/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3869	VOC	07/14/2025	0.80	HARRIS	GB BIOSCIENCES LLC
3870	VOC	08/03/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3915	VOC	06/15/2025	0.10	HARRIS	GB BIOSCIENCES LLC
3916	VOC	12/25/2025	1.00	HARRIS	GB BIOSCIENCES LLC
4043	NOX	12/18/2024	18.40	HARRIS	GB BIOSCIENCES LLC

Contact Information

Primary Contact Name: RANDALL LACK
Address: 3555 TIMMONS LANE, SUITE 900 HOUSTON, TX 77027
Phone: 281-207-7213
Email: RLACK@ELEMENTMARKETS.COM
Technical Contact Name: SAM CEGIELSKI
Phone: 281-207-7200
Email: SETTLEMENTSSUPPORT@ANEWCLIMATE.COM

I certify that I have not violated any term in my TCEQ STEERS participation agreement and have no reason to believe that the confidentiality or use of my password has been compromised at any time. I understand that entering my password and pressing the "Confirm Submit" button constitutes an electronic signature legally equivalent to my written signature.

I certify that I am authorized to make this submission on behalf of the owners and operators of the site and facilities included in this submission. I certify that I have knowledge of the information in this submission and any attachments, and that, based on my knowledge and belief formed after reasonable inquiry, the information is true, accurate, and complete. I acknowledge that I have read and understand Texas Water Code (TWC) §§7.177-7.183, which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §7.187, pertaining to criminal penalties. Additionally, I understand that TWC §5.102 and Texas Health and Safety Code §382.002 authorize the TCEQ to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated.

This document was signed by Sam Cegielski.

Signature Hash: C8AF738A055367C33C8E78AA50515DE2CCCECC621B1EF9B3517D4D2CEC16AD59

The following is additional information contained in your Copy of Record:

Submission IP address: 98.197.142.183

Submission date and time: 05/01/2024

Submission STEERS Version: 6.74

Submission Confirmation Number: 17136

Submission Data Hash Code: B1B563B6B60156437130317D4C331E05898E14277332664D3376FFFB6404B3BD

From: [Natalie Namba](#)
To: RLACK@ELEMENTMARKETS.COM
Cc: SETTLEMENTSSUPPORT@ANEWCLIMATE.COM; Air_Permits@pcs.hctx.net;
HHDBPCPCentralFiles@houston.tx.gov; [Chris Lehmann](#)
Subject: TCEQ EBT Documents - ERC Creditability Review - Element Markets Emissions LLC
Date: Monday, July 1, 2024 11:33:00 AM
Attachments: [419083 ERC Creditability Review Letter.pdf](#)

Please see the attached EBT document(s) for project number **419083**. 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

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

From: [APDDIR](#)
To: [Rebecca Partee](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Natalie Namba](#)
Subject: RE: For Review and Approval by 7/2/2024: ERC Re-Review 419083
Date: Monday, July 1, 2024 9:32:09 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/customersurvey

From: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Sent: Monday, July 1, 2024 9:08 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Natalie Namba <Natalie.Namba@tceq.texas.gov>
Subject: FW: For Review and Approval by 7/2/2024: ERC Re-Review 419083

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Friday, June 28, 2024 2:24 PM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Natalie Namba <Natalie.Namba@tceq.texas.gov>
Subject: FW: For Review and Approval by 7/2/2024: ERC Re-Review 419083

Please see the attached documents for ERC Re-Review 419083.