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 2, 2024

JEREMY ALBERTY
DIRECTOR OF OPERATIONS
LBC HOUSTON LP
2625 BAY AREA BOULEVARD, SUITE 200
HOUSTON, TEXAS 77058
Via email

Subject: MECT Annual Compliance Report
LBC Houston LP
LBC Houston Bayport Terminal
Customer Number: CN601179849
Regulated Entity Number: RN101041598
EBT Portfolio Number: P1572
Project Number: 418801

Dear Jeremy Alberty:

The Texas Commission on Environmental Quality (TCEQ) has processed the 2023 Mass Emissions Cap and Trade (MECT) Annual Compliance Report submitted on March 25, 2024, for compliance with 30 Texas Administrative Code (TAC) §101.359. This processing does not constitute an approval of the emissions quantification methods or results submitted in the site's Annual Compliance Report. A summary of the site's compliance account (portfolio) for the control period is attached.

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 Emissions Banking and Trading (EBT) program, please contact Marie Mercado at Marie.Mercado@tceq.texas.gov, or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Samuel Short, Deputy Director
Air Permits Division
Office of Air

cc: Gary Cotie, Technical Contact, LBC Houston LP
Director, Harris County, Pollution Control Services, Pasadena

Table 1. Compliance Account Summary.

2023 Control Period	Amount (tons)
Certified Allocation	2.1
Previous Year Deficit with 10% Penalty	0.0
Total Current Allowances Traded In	0.0
Total Current Allowances Traded Out	0.0
Vintage Allowances from Previous Year	0.0
Vintage Allowances Traded In	18.0
Vintage Allowances Traded Out	0.0
Total Reported Emissions	13.5
Quantification Penalty	0.0
Current Allowances Used for Compliance	2.1
Vintage Allowances Used for Compliance	11.4
Deficit	0.0
Vintage Allowances Expired	6.6
Current Allowances Remaining	0.0

2023 MECT Annual Compliance Report
Technical Review

Project Number:	418801	Project Manager:	Marie Mercado
Customer Reference No.:	CN601179849	Company Name:	LBC Houston LP
Regulated Entity Reference No.:	RN101041598	Site Name:	LBC Houston Bayport Terminal
Portfolio Number:	P1572	County:	Harris

Review Summary

Review Level:	☐ Basic ☒ Audit
Source Type:	☒ Major ☐ Minor ☐ Electric Generation Utility
Quantification Penalty:	☐ Yes ☒ No
Potential Deviation:	☐ Yes ☒ No
Was the company notified about insufficient allowances, penalties, or changes to the report?	☒ Yes ☐ N/A

General Review

Review	Yes/No	Explanation
Was the report submitted on or before March 31?	Yes	Date Submitted: 3/25/2024
Was the report certified (submitted) by the portfolio's registered Primary or Alternate Authorized Account Representative (AAR)?	Yes	Certified by: John D. Powe Copy of Record Signed by: James Alberty
Are the company and site information consistent with Central Registry?	Yes	
Were any new EPNs reported or did any existing EPNs undergo a change in status (e.g., shutdown, removed, etc.)?	No	
Did the site's account for this control period have sufficient allowances to cover the emissions and any penalties assessed?	Yes	

Audit Emissions Review

Review	Yes/No	Explanation
Were appropriate protocol citations provided for the Level of Activity (LOA) and Emission Factor (EF) for each FIN?	Yes	
For units without CEMS/PEMS, were the LOA and EF for each FIN reported in the units of the applicable Chapter 117 emission specifications?	Yes	

Review	Yes/No	Explanation
Was the appropriate supporting documentation provided for each FIN? See the MECT Supporting Documentation Guidance.	Yes	Received the stack test for vapor combustors, FINs VC-4 and VC-3, on 4/18/2024 and 6/13/2024, respectively
Have all relevant stack tests been reviewed to determine if the results are acceptable under §101.354(a)? Is the EF in the stack test the same value reported for this control period?	Yes	
Were the emission quantification calculations correct? See Annual Reports SOP for instructions on reviewing a representative sample for each FIN type.	Yes	See Additional Notes
Were emissions from one or more FINs determined using alternate data under §101.354(b)?	No	See Additional Notes

Additional Notes

For facility identification number (FIN) VC-4, a weighted average emission factor was calculated. The emission factor was determined by completing two iterations of the weight average EF equations. The weighted EF (EF_W) was determined as follow:

$$EF_W = \frac{\left(\frac{Fuel\ Use_1 \times Fuel\ Heating\ Value_1}{1{,}000{,}000} \times EF_1\right) + \left(\frac{Fuel\ Use_2 \times Fuel\ Heating\ Value_2}{1{,}000{,}000} \times EF_2\right)}{LOA_1 + LOA_2} = \frac{(LOA_1 \times EF_1) \times (LOA_2 \times EF_2)}{LOA_1 + LOA_2}$$

Where:

Fuel Use 1 & 2 Units: standard cubic feet per year (scf/yr)
Fuel Heating Value 1 & 2 Units: British thermal units (Btu)/scf
LOA 1 & 2 Units: million Btu (MMBtu)/yr
EF 1 & 2 Units: pound (lb)/MMBtu

For the first portion of the control period prior to the stack test being conducted, the EF for the natural gas was based on manufacturer data and engineering calculations and the EF for the waste gas was based on manufacturer data per the project file for Permit Project Number 290957 (Permit Number 3467B). For the second portion of the control period after the stack test was conducted, the EF was based on the stack test.

Since there are two EFs associated with the first portion of the control period due to the two fuel types, a weighted EF was determined for this portion of the control period.

$$EF_{W1} = \frac{\left(\frac{47694507.44 \times 1000}{1{,}000{,}000} \times 0.1\right) + \left(\frac{77418.79493 \times 18500}{1{,}000{,}000} \times 0.15\right)}{47694.507445 + 1432.247706} = 0.101458\ lb/MMBtu$$

The following is the weighted EF for the entire control period using EF_{W1} and the stack test EF. This is the EF that is entered into the EBT database for 2023 control period.

$$EF_{W2} = \frac{(49126.755151 \times 0.101458) + \left(\left(\frac{119012685.3 \times 1000}{1{,}000{,}000} + \frac{322226.6771 \times 18500}{1{,}000{,}000}\right) \times 0.034\right)}{49126.755151 + 124973.878841} = 0.053035\ lb/MMBtu$$

No penalties were assessed for use of alternate data before the stack test was conducted. The company was notified on June 21, 2024, that the EF was updated increasing the total number of emissions for vapor combustor FIN VC-4.

07/02/2024 ---------- EBTP IMS- PROJECT RECORD ----------

PROJECT#: 418801 STATUS: C DISP CODE: _____
RECEIVED: 03/25/2024 PROJTYPE: BRPT ISSUED DT: _____
SUP-DISP DATE: 07/02/2024

STAFF ASSIGNED TO PROJECT:
MERCADO, MARIE

PROJECT NOTES:

.Attachments from Steers

.Copy Of Record from Steers

.2023 AUDIT REVIEW

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: LBC HOUSTON LP
CUSTOMER REGISTRY ID: CN601179849

PORTFOLIO DATA

NUMBER: P1572 NAME: LBC HOUSTON - BAYPORT - RN101041598

SITE DATA

ACCOUNT: HG0029P
REG ENTITY ID: RN101041598
SITE NAME: LBC HOUSTON BAYPORT TERMINAL
COUNTY: HARRIS NEAREST CITY: SEABROOK
LOCATION: NORTHEAST INTERSECTION OF HWY 146 AND PORT RD

CONTACT DATA

NAME: JEREMY ALBERTY TITLE: DIRECTOR OF OPERATIONS
ROLE: AAR
STREET: 2625 Bay Area Boulevard ste 200
CITY/STATE,ZIP: Houston, TX , 77058-
PHONE: 281-291-3401 -
EMAIL: J-ALBERTY@LBCTT.COM

NAME: GARY COTIE TITLE:
ROLE: TECHNICAL
STREET:
CITY/STATE,ZIP:
PHONE: 832-691-8796 -
EMAIL: G-COTIE@LBCTT.COM

TRANSACTION DATA

TRANSACTION TYPE:CAP_RPT POLLUTANT : NOX
EFFECTIVE YEAR: 2023 TON: 1.6

Allowance Type	Total
ACTUAL	13.5

TRANSACTION TYPE:CAP_VINT POLLUTANT : NOX
EFFECTIVE YEAR: 2023 TON: 0

TRACKING ACTIVITES

PROJECT SUBMITTED :	03/25/2024	PROJECT RECEIVED BY PM :	03/25/2024	AUDIT REPORT :	03/31/2024
TR - DEFICIENCY CYCLE :	04/18/2024	04/19/2024	TEAM LEAD REVIEW :	06/24/2024	SECTION MANAGER REVIEW : 06/28/2024

Confirm Records to Send to TCEQ

Portfolio Number:P1572
Data current as of:03/25/2024

Portfolio Information

Portfolio Number: P1572
Portfolio Name: LBC HOUSTON - BAYPORT - RN101041598
Program: MECT
Project Number: 418801
Pollutant Code: NOX
Control Period: 2023

FIN:BLR-3	**Fin Name:BOILER-1363**				**EPN:BLR-3**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
20045.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.157000	LB/MMBTU	1.57
FIN:BLR-4	**Fin Name:BOILER-1364**				**EPN:BLR-4**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
13456.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.072000	LB/MMBTU	0.48
FIN:BLR-5	**Fin Name:600 HP BOILER-6962**				**EPN:BLR-5**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
43182.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.030000	LB/MMBTU	0.65
FIN:MISC	**Fin Name:VAPOR OXIDIZER**				**EPN:VO-1**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
151041.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.050000	LB/MMBTU	3.78
FIN:VC-1	**Fin Name:VAPOR COMBUSTOR 1-12052**				**EPN:**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
115886.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.013000	LB/MMBTU	0.75
FIN:VC-2	**Fin Name:VAPOR COMBUSTER 2-12053**				**EPN:**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
115886.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.014000	LB/MMBTU	0.81
FIN:VC-3	**Fin Name:VAPOR COMBUSTOR 3-12053-13188**				**EPN:**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
115886.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.019000	LB/MMBTU	1.10
FIN:VC-4	**Fin Name:VAPOR COMBUSTOR-13796**				**EPN:**	**CEMS/PEMS:No**
LOA	**LOA Citation**	**LOA Units**	**EF Citation**	**EF**	**EF Units**	**Tons Reported**
174101.000000	117.340(a)(1)(B)	MMBTU	117.340(o)	0.034000	LB/MMBTU	2.96

Total Tons **12.1**

Contact Information

Primary Contact Name: JEREMY ALBERTY
Address: 2625 Bay Area Boulevard ste 200 Houston, TX 77058
Phone: 281-291-3401
Email: J-ALBERTY@LBCTT.COM
Technical Contact Name: GARY COTIE
Phone: 832-691-8796
Email: G-COTIE@LBCTT.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 John D Powe.
Signature Hash: 1CE47D7A76D7DF1843D65F57E9390ED7F857306F930559E9B27BCF14A504EC80

The following is additional information contained in your Copy of Record:
Submission IP address: 149.20.201.60
Submission date and time: 03/25/2024
Submission STEERS Version: 6.73
Submission Confirmation Number: 16751
Submission Data Hash Code: E6DBD2D14A6BD2D1FF25999CE7446B6A51FA943D1582B85285FB7160E4C1FDB3

04/19/24

LBC Houston RN101041598 2023 MECT Report Submittal COR

Final Audit Report 2024-04-19

Created:	2024-04-18
By:	John Powe (jdpowe@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAaHD_zSxwTzMtxme80akK_ValKu_MWaeK

"LBC Houston RN101041598 2023 MECT Report Submittal COR" History

Document created by John Powe (jdpowe@gmail.com)
2024-04-18 - 7:37:33 PM GMT- IP address: 149.20.200.239

Document emailed to Jeremy Alberty (j-alberty@lbctt.com) for signature
2024-04-18 - 7:37:39 PM GMT

Email viewed by Jeremy Alberty (j-alberty@lbctt.com)
2024-04-19 - 7:02:19 PM GMT- IP address: 104.47.0.254

Document e-signed by Jeremy Alberty (j-alberty@lbctt.com)
Signature Date: 2024-04-19 - 7:03:34 PM GMT - Time Source: server- IP address: 149.20.201.157

Agreement completed.
2024-04-19 - 7:03:34 PM GMT

Adobe Acrobat Sign

LBC HOUSTON BAYPORT TERMINAL
Annual Combustion Source Emissions
Time Period: **December 2023 - January 2023**

SOURCE DATA:

EPN	Description of Unit	Fuel Used	Higher Heating Value (Btu/scf)	Rated Horsepower (hp)	Annual Operating Hours (hrs/yr)	Annual Fuel Consumption (MMscf/yr)	Mass of VOC to Vapor Control Device (lbs/yr)	Mass of VOC to Vapor Control Device (tpy)	Waste Stream Heating Value (Btu/lb)	Waste Stream Heat Release (MMBtu/mo)	Natural Gas Heat Release (MMBtu/mo)	Total Heat Released (MMBtu/mo)	Destruction Efficiency
VO-1	Vapor Oxidizer	Natural Gas	1,000	-	8,760	147.16	259,084.44	129.54	15,000	3,886.27	147,155.00	151,041.27	99.9%
VC-4	Vapor Combustor	Natural Gas	1,000	-	8,760	166.71	399,645.47	199.82	18,500	7,393.44	166,707.19	174,100.63	99.9%
BLR-3	Cleaver Brooks Boiler	Natural Gas	1,000	600	8,760	20.04	-	-	-	-	-	-	-
BLR-4	Reliance 3WB350 Boiler	Natural Gas	1,000	350	8,760	13.46	-	-	-	-	-	-	-
BLR-5	Cleaver Brooks Boiler	Natural Gas	1,000	600	8,760	43.18	-	-	-	-	-	-	-

EMISSION FACTORS:

		Natural Gas					Waste Gas				
EPN	Description of Unit	NOx [1] (lb/MMscf)	CO [1] (lb/MMscf)	VOC [2] (lb/MMscf)	PM [2] (lb/MMscf)	SO_2 [2] (lb/MMscf)	NOx [1] (lb/MMscf)	CO [1] (lb/MMscf)	VOC [2] (lb/MMscf)	PM [2] (lb/MMscf)	SO_2 [2] (lb/MMscf)
VO-1	Vapor Oxidizer	50.0	160.0	5.5	7.6	0.6	0.05	0.16	-	0.0076	0.0000
VC-4	Vapor Combustor	100.0	84.0	5.5	7.6	0.6	0.15	0.20	-	0.0076	0.0000
BLR-3	Cleaver Brooks Boiler	157.0	3.0	5.5	7.6	0.6	-	-	-	-	-
BLR-4	Reliance 3WB350 Boiler	72.0	0.4	5.5	7.6	0.6	-	-	-	-	-
BLR-5	Cleaver Brooks Boiler	30.0	30.0	5.5	7.6	0.6	-	-	-	-	-

[1] Based on Stack Testing

[2] Based on AP-42 Table 1.4-2 "Emission Factors for Criteria Pollutants and Greenhouse Gasses from Natural Gas Combustion" (7/98)

ANNUAL EMISSIONS:

		NOx		CO		VOC		PM		SO_2	
EPN	Description of Unit	(lb/hr) [5]	(tpy) [6]	(lb/hr) [5]	(tpy) [6]	(lb/hr) [5]	(tpy) [6]	(lb/hr) [5]	(tpy) [6]	(lb/hr) [5]	(tpy) [6]
VO-1	Vapor Oxidizer	0.8621	3.7760	2.7587	12.0833	0.1220	0.5342	0.1310	0.5740	0.0101	0.0441
VC-4	Vapor Combustor	0.6757	2.9597	1.6222	7.1052	0.1503	0.6583	0.1510	0.6616	0.0114	0.0500
BLR-3	Cleaver Brooks Boiler	0.3593	1.5735	0.0069	0.0301	0.0126	0.0551	0.0174	0.0762	0.0014	0.0060
BLR-4	Reliance 3WB350 Boiler	0.1106	0.4844	0.0006	0.0027	0.0084	0.0370	0.0117	0.0511	0.0009	0.0040
BLR-5	Cleaver Brooks Boiler	0.1479	0.6477	0.1479	0.6477	0.0271	0.1188	0.0375	0.1641	0.0030	0.0130

[5] Emission Rate (lb/hr) = (Emission Factor lb/MMscf) * (Annual Fuel Use, MMscf/yr)

[6] Emission Rate (ton/yr) = (Emission Factor lb/MMscf) * (Annual Fuel Use, MMscf/yr) * (1 ton/2000 lb)

[7] Emission Rate (lb/hr) = (Emission Factor g/hp-hr) * (1 lb/453.6 g) * (Rated HP)

[8] Emission Rate (lb/hr) = (Emission Factor lb/hp-hr) * (Rated HP)

[9] Emission Rate (ton/yr) = (Emission Rate, lb/hr) * (Annual Hours of Operation, hr/yr) * (1 ton/2000 lb)

LBC HOUSTON SEABROOK TERMINAL

Annual Vapor Combustor Emissions

Time Period: **DECEMBER 2023 - JANUARY 2023**

SOURCE DATA:

EPN	Description of Unit	Destruction Efficiency	Natural Gas HHV (Btu/scf)	No. of Pilots	Natural Gas Flow per Pilot (scf/hr)	Pilot Natural Gas Usage (MMscf/yr)	Natural Gas Assist Gas Flow (MMscf/yr)	Natural Gas Heat Release (MMBtu/yr)
VC-1	Vapor Combustor 1	99.9%	1,000	4	100	3.50	46.97	50,474.33
VC-2	Vapor Combustor 2	99.9%	1,000	4	100	3.50	46.97	50,474.33
VC-3	Vapor Combustor 3	99.9%	1,000	4	100	3.50	46.97	50,474.33
					VC-CAP Total:	**10.512**	**140.91**	**151,423.00**

WASTE STREAM DATA:

Source	Waste Stream Heating Value (Btu/lb)	Max H_2S Concentration (ppmv)	Annual H_2S Flowrate (lb/yr)	Annual VOC Flowrate (lb/yr)	Waste Stream Heat Release (MMBtu/yr)
Ship Loading	20,000	3,000	27,357	9,119,125.93	182,382.52
Barge Loading	20,000	3,000	2,078.09	692,695.22	13,853.90
IFR Landing	20,000	3,000	0	0.00	0.00
Tank Degassing	20,000	3,000	0	0.00	0.00
		Total:	**29,435.46**	**9,811,821.15**	**196,236.42**

EMISSION FACTORS:

Pollutant	VC-1 (lb/MMBtu)	VC-2 (lb/MMBtu)	VC-3 (lb/MMBtu)
NO_X	0.013	0.014	0.019
CO	0.036	0.030	0.031
VOC	0.0055	0.0055	0.0055
PM	0.0076	0.0076	0.0076
SO_2	0.0006	0.0006	0.0006

[1] Based on Stack Testing

[2] Based on AP-42 Table 1.4-2 "Emission Factors for Criteria Pollutants and Greenhouse Gasses from Natural Gas Combustion" (7/98)

ANNUAL EMISSIONS SUMMARY:

FIN	EPN	NOx [3] (tpy)	CO [3] (tpy)	VOC [4] (tpy)	PM [4] (tpy)	SO_2 [5] (tpy)
VC-1	VC-1	0.7533	2.0860	1.7741	0.0133	2.6214
VC-2	VC-2	0.8112	1.7383	1.7741	0.0133	2.6214
VC-3	VC-3	1.1009	1.7962	1.7741	0.0133	2.6214
	TOTAL:	**2.6654**	**5.6205**	**5.3223**	**0.0399**	**7.8642**

[3] Emissions From Combustion + Pilot:

Emission Rate (tpy) = (Pilot EF, lb/MMscf) * (Pilot Gas Usage, MMscf/yr) + (Total Heat Release, MMBtu/yr) * (Combustion EF, lb/MMBtu) / 2000 (lbs/ton) / 3 VCUs

[4] Emission Rate (tpy) = (Pilot EF, lb/MMscf) * (Pilot Gas Usage, MMscf/yr) * (1 ton/2000 lb)

[6] Emissions From Pilot + Conversion of H2S to SO2 from H2S Combustion:

Emission Rate (tpy) = (Pilot EF, lb/MMscf) * (Pilot Gas Usage, MMscf/yr) + (Annual H2S Flowrate, tpy) * (MW H2S /MW SO2) / 3 VCUs

MRW technologies, inc.

June 22, 2016

Aura Engineering, LLC

Attention: Ashley Castle-Carpenter

Subject: LBC Vapor Combustor Emissions Requirements (LBC PO# 118744, MRW Job# 111502)

Ashley:

As requested, MRW expects the destruction removal efficiency (DRE) to be 99.9% of non-methane hydrocarbons (NMHCs) for the two LBC vapor combustion systems.

We recommend the unit be operated at an estimated range of 1600˚F to 1800˚F with the final operating temperature to be determined from stack emissions test results. The unit will need to be preheated to that operating temperature prior to the introduction of the waste stream. This DRE is based on not exceeding the maximum flow rates and compositions as specified in Table 1 below. The maximum allowable heat release for each vapor combustor is not to exceed 143.3 MMBTU/hr.

The expected NOx and CO emissions are as follows

- The expected NOx emissions are 0.15 lb/MMBTU fired
- The expected CO emissions are 0.10 lb/MMBTU fired

Table 1: Design cases for each of the vapor combustors

	Maximum Heat Release Case	*Maximum Flow Case*
Maximum Flow (scfm)	1,795	2,821
Maximum Heat Content (BTU/scf)	1,330	300
Total Heat Release (MMBTU/hr)	143.3	50.8
VOC Flow Rate	927	0
VOC Heating Value (BTU/scf)	2,576	-
Approximate VOC Molecular Weight	50.4	-
Approximate Vapor Molecular Weight	39.67	25.51
Air Flow Rate in Vapor (scfm)	869	1,975
Enriching Gas Flow (scfm)	0	847
Enriching Gas Heating Value (BTU/scf)	1,000	1,000
Temperature (˚F)	130	76

If you have any questions please feel free to contact us.

Best Regards,

Michael Steele

C O M B U S T I O N S Y S T E M S

2301 West 171st Street S., Glenpool, OK 74033 • tel: 918.827.6030 • fax: 918.827.6034 • email: mrw@mrw-tech.com

Notice of Deficiency Number 2

These questions are based on the review of the application. Note that additional information may be requested to complete this project, based on responses provided to this notice.

1. **TCEQ Request June 10, 2024:** The annual nitrogen oxide (NO_x) emissions for each facility reported through the State of Texas Environmental Electronic Reporting System (STEERS) and the provided in the supporting documentation attached in STEERS are not consistent. Please review the attached copy of record (COR) and supporting documentation, explain the discrepancy, and ensure that the documentation provided below support the values that represent the annual NO_x emissions for the 2023 control period.

   Company Response June 13, 2024: After reviewing and comparing both the COR and Supporting Documentation originally provided, it appears both match and are consistent. Below is a comparison:

"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	NO_x Emissions per COR (tons)	NO_x Emissions per Supporting Documentation (tons)
BLR-3	Cleaver Brooks Boiler	1.57	1.5735
BLR-4	Reliance 3WB350 Boiler	0.48	0.4844
BLR-5	Cleaver Brooks Boiler	0.65	0.6477
MISC	Vapor Oxidizer	3.78	3.7760
VC-1	Vapor Combustor 1	0.75	0.7533
VC-2	Vapor Combustor 2	0.81	0.8112
VC-3	Vapor Combustor 3	1.1	1.1009
VC-4	Vapor Combustor	2.96	2.9597

2. **TCEQ Request June 10, 2024:** Please provide the annual fuel usage (million standard cubic feet, MMscf) for each facility.

   Company Response June 13, 2024: Please find the annual fuel usage in the table below. Note, VOC vapors are not tracked in MMscf, rather the AP42 Chapter 5.2 loading loss equation is utilized to output vapor mass in lbs. The vapor mass (lbs) is converted to MMbtu for combustion mass emission calculation purposes.

"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Usage (MMscf)	Mass of VOC to Vapor Control Device (lbs)
BLR-3	Cleaver Brooks Boiler	20.0449	-
BLR-4	Reliance 3WB350 Boiler	13.4555	-
BLR-5	Cleaver Brooks Boiler	43.1824	-
MISC	Vapor Oxidizer	147.1600	259,084.44
VC-1	Vapor Combustor 1	50.4743	3,270,607.05

"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Usage (MMscf)	Mass of VOC to Vapor Control Device (lbs)
VC-2	Vapor Combustor 2	50.4743	3,270,607.05
VC-3	Vapor Combustor 3	50.4743	3,270,607.05
VC-4	Vapor Combustor	166.7072	399,645.47

3. **TCEQ Request June 10, 2024:** Please provide the basis for the gross heating value of each fuel type. (e.g., fuel test data, supplier data, AP-42, etc.)

"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Heating Value (Btu/scf)*	Waste Gas Fuel Heating Value (Btu/lb)*
BLR-3	Cleaver Brooks Boiler	1,000	-
BLR-4	Reliance 3WB350 Boiler	1,000	-
BLR-5	Cleaver Brooks Boiler	1,000	-
MISC	Vapor Oxidizer	1,000	15,000
VC-1	Vapor Combustor 1	1,000	20,000
VC-2	Vapor Combustor 2	1,000	20,000
VC-3	Vapor Combustor 3	1,000	20,000
VC-4	Vapor Combustor	1,000	18,500

**Based on permit application calculations*

4. **TCEQ Request June 10, 2024:** Please provide a full electronic copy of the stack test for vapor combustor, facility identification number (FIN) VC-3.

   Company Response June 13, 2024: Please find the "VC-3 Stack Test 2021.PDF" document attached.

   If the facility was retested or tested for the first time during the 2023 control period, The new stack test emission factor (EF) can only be used to calculate emissions from the date of the test forward. Please provide the following information:

   Company Response June 13, 2024: VC-3 was not retested or tested in 2023.

   a. the EF for the period of time before the stack test date and documentation to support the emission factor; N/A

   b. the fuel usage values (MMscf) for the period of time before and after the stack test date listed separately; N/A

   c. the level of activity (million British thermal units, MMBtu) for the period before and after the stack test date listed separately; and N/A

   d. the weighted EF for vapor combustor, facility identification number (FIN) VC-4, and the calculations used. Refer to the MECT Calculation Tool in Excel found on the Emissions Banking and Trading (EBT) Mass Emissions Cap and Trade (MECT) webpage. If this tool is used, please provide the Excel file. N/A

5. **TCEQ Request June 10, 2024:** Please provide the maximum rated capacity of the vapor combustors, FINs VC-3 and VC-4.

   Company Response June 13, 2024:

   VC-3: 20,000 BBL/hr per stack test documentation

   VC-4: 20,000 BBL/hr per stack test documentation

6. **TCEQ Request June 10, 2024:** The stack test for vapor combustor, FIN VC-4, was not conducted until May 11, 2023. The new stack test value can only be used to calculate emissions from the date of the test forward. Please provide the following information:

   a. the EF for the period of time before the stack test date and documentation to support the emission factor;

      Company Response June 13, 2024: Please find the "VC-4 Permitted NOx EF Basis.PDF" attached.

   b. the fuel usage values (MMscf) for the period of time before and after the stack test date listed separately;

      Company Response June 13, 2024: Please find the monthly breakdown of fuel usage below:

January - May 2023

Month	"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Usage (MMscf)	Mass of VOC to Vapor Control Device (lbs)
January	VC-4	Vapor Combustor	5.4626	3,370.14
February			7.6324	403.36
March			5.8312	11,761.11
April			11.2612	11,919.37
May			17.5071	49,964.82

June - December 2023

Month	"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Usage (MMscf)	Mass of VOC to Vapor Control Device (lbs)
June	VC-4	Vapor Combustor	7.8046	74,390.23
July			14.2996	52,103.02
August			15.8957	52,650.17
September			16.3173	47,117.09
October			18.5806	36,658.83
November			17.9895	28,517.03
December			28.1255	30,790.31

c. the level of activity (million British thermal units, MMBtu) for the period before and after the stack test date listed separately; and

January - May 2023

Month	"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Usage (MMscf)	Natural Gas Fuel Heat Release (Mmbtu)	Mass of VOC to Vapor Control Device (lbs)	Waste Gas Heat Release (Mmbtu)	Total Heat Release (Mmbtu)
January	VC-4	Vapor Combustor	5.4626	5462.5632	3,370.14	62.35	5,524.91
February			7.6324	7632.3818	403.36	7.46	7,639.84
March			5.8312	5831.2223	11,761.11	217.58	6,048.80
April			11.2612	11261.1994	11,919.37	220.51	11,481.71
May			17.5071	17507.1408	49,964.82	924.35	18,431.49

June - December 2023

Month	"FIN" Name per COR	"Description of Unit" Name per Supporting Documentation	Natural Gas Fuel Usage (MMscf)	Natural Gas Fuel Heat Release (Mmbtu)	Mass of VOC to Vapor Control Device (lbs)	Waste Gas Heat Release (Mmbtu)	Total Heat Release (Mmbtu)
June	VC-4	Vapor Combustor	7.8046	7804.5926	74,390.23	1,376.22	9,180.81
July			14.2996	14299.5808	52,103.02	963.91	15,263.49
August			15.8957	15895.6862	52,650.17	974.03	16,869.71
September			16.3173	16317.3367	47,117.09	871.67	17,189.00
October			18.5806	18580.5501	36,658.83	678.19	19,258.74
November			17.9895	17989.4721	28,517.03	527.57	18,517.04
December			28.1255	28125.4669	30,790.31	569.62	28,695.09

d. the weighted EF for vapor combustor, facility identification number (FIN) VC-4, and the calculations used.

Company Response June 13, 2024: For the RY2023 MECT submittal, we applied the stack tested 0.034 lb/MMbtu NO_x EF to VC-4 for all 12 months. Please find the "VC-4 2023 Weighted NOx EF - MECT Calculation Tool.XLSX" document attached where the weighted NOx EF has been calculated.

From:	John Powe
To:	Marie Mercado
Subject:	RE: Action Required by 4/22/2024: Notice of Deficiency for GEO Specialty Chemicals" MECT Report
Date:	Friday, April 19, 2024 2:41:38 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png LBC Houston RN101041598 2023 MECT Report Submittal COR - signed J. Alberty.pdf

Good afternoon, Ms. Mercado – In addition to the stack test report files sent yesterday, please see the attached COR signed by Mr. Jermey Alberty.

I believe this should complete the items you requested.

Please let me know if anything else is needed.

Thank you,

John Powe
Regional Manager – Air Compliance, Freeport Safety

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E j-powe@lbctt.com
W www.lbctt.com

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From: John Powe
Sent: Thursday, April 18, 2024 3:12 PM
To: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: RE: Action Required by 4/22/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

Ms. Mercado – As referenced, attached are the remaining two sections of the stack test report for VC-4.

Please let me know if you need anything else besides the COR with Mr. Alberty's signature. I will forward that shortly.

Thank you,

John Powe
Regional Manager – Air Compliance, Freeport Safety

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From: John Powe
Sent: Thursday, April 18, 2024 3:10 PM
To: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: RE: Action Required by 4/22/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

Good afternoon, Ms. Mercado –

1. I will have the COR with Jeremy Alberty's signature to you shortly.
2. Please see the attached first two of four sections that make up the complete stack test report for VC-4. Since these are large files, I will send the remaining two sections in another email to follow this one.

Please let me know if you have any questions or need any additional information in the meantime.

Thank you,

John Powe
Regional Manager – Air Compliance, Freeport Safety

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From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Thursday, April 18, 2024 9:31 AM
To: Jeremy Alberty <j-alberty@lbctt.com>
Cc: Gary Cotie <g-cotie@lbctt.com>
Subject: Action Required by 4/22/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

Dear Jeremy Alberty:

This e-mail is in response to the Mass Emissions Cap and Trade (MECT) Report application submitted to the Texas Commission on Environmental Quality (TCEQ) on March 25, 2024 (Emissions Banking and Trading (EBT) Project Number 418801).

The following information is required to proceed with the review of your project:

1. **TCEQ Request April 18, 2024:** The person that certified your Mass Emissions Cap and Trade (MECT) Report, John D. Powe, is not registered as an Authorized Account Representative (AAR) for portfolio P1572. An AAR is required to certify (sign) all EBT applications submitted for each portfolio.
    a. Please have the AAR/alternate AAR (AAAR) sign the attached Copy of Record and return it via email.
    b. If necessary, update your company's AAR contact information through the State of Texas Environmental Electronic Reporting System (STEERS). See the Emission Banking and Trading (EBT) STEERS guidance for details on editing the AAR/AAAR.
2. **TCEQ Request April 18, 2024:** Please provide a full electronic copy of the stack test for vapor combustor, facility identification number (FIN) VC-4.

Please provide this information by Monday, April 22, 2024. Contact me if you have any questions.

Sincerely,

Marie Mercado, P.E.
Engineer V

Texas Commission on Environmental Quality
Emissions Trading and Banking Programs, MC-163
Office of Air, Air Permits Division, Permit Support Section
PO BOX 13087
Austin, Texas 78711-3087
512.239.2054
512.239.6188 (Fax)
Marie.Mercado@tceq.texas.gov

From: John Powe
To: Marie Mercado
Subject: RE: Action Required by 6/14/2024: Notice of Deficiency for GEO Specialty Chemicals" MECT Report
Date: Thursday, June 13, 2024 3:52:33 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
VC-3 Stack Test 2021.pdf
VC-4 2023 Weighted NOx EF - MECT Calculation Tool.xlsx
VC-4 Permitted NOx EF Basis.pdf
VC-4 Stack Test 2023.pdf
NOD 2_LBC Houston LP Response_20240613.docx

Good afternoon, Ms. Mercado – Please see the attached Word document with responses to each specific question/issue. In addition, please see the attached supporting documents that are referenced in responses.

Please let me know what other questions there are and what additional information we can provide.

Thank you,

John Powe
Regional Manager – Air Compliance, Freeport Safety

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From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Thursday, June 13, 2024 7:04 AM
To: John Powe <J-Powe@lbctt.com>
Subject: RE: Action Required by 6/14/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

Good Morning Mr. Powe,

I appreciate the update and look forward to receiving your responses by close of business

today.

Sincerely,

Marie Mercado, P.E.
Work Leader

Texas Commission on Environmental Quality
Emissions Trading and Banking Programs, MC-163
Office of Air, Air Permits Division, Permit Support Section
P.O. BOX 13087
Austin, Texas 78711-3087
512.239.2054
512.239.6188 (Fax)
Marie.Mercado@tceq.texas.gov

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

From: John Powe <J-Powe@lbctt.com>
Sent: Wednesday, June 12, 2024 3:54 PM
To: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: RE: Action Required by 6/14/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

Good afternoon, Ms. Mercado – Just wanted to let you know your request for additional information and the NOD were routed to me for response. I am working on those responses and will have them to you by close of business tomorrow.

Thank you,

John Powe
Regional Manager – Air Compliance, Freeport Safety

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From: Gary Cotie <g-cotie@lbctt.com>
Sent: Monday, June 10, 2024 12:16 PM
To: John Powe <J-Powe@lbctt.com>
Subject: FW: Action Required by 6/14/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

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From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Monday, June 10, 2024 10:24 AM
To: Jeremy Alberty <j-alberty@lbctt.com>
Cc: Gary Cotie <g-cotie@lbctt.com>
Subject: Action Required by 6/14/2024: Notice of Deficiency for GEO Specialty Chemicals' MECT Report

Dear Jeremy Alberty:

This e-mail is in response to the Mass Emissions Cap and Trade (MECT) Report application submitted to the Texas Commission on Environmental Quality (TCEQ) on March 25, 2024 (Emissions Banking and Trading (EBT) Project Number 418801).

The items in the attached Notice of Deficiency (NOD) document are required before we can process your project.

Please provide this information by Friday, June 14, 2024. Contact me if you have any questions.

Sincerely,

Marie Mercado, P.E.
Work Leader

Texas Commission on Environmental Quality
Emissions Trading and Banking Programs, MC-163
Office of Air, Air Permits Division, Permit Support Section
P.O. BOX 13087
Austin, Texas 78711-3087
512.239.2054
512.239.6188 (Fax)
Marie.Mercado@tceq.texas.gov

From:	Marie Mercado
To:	John Powe
Subject:	RE: Notification for LBC Houston Bayport Terminal"s MECT Report
Date:	Monday, June 24, 2024 10:00:00 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png

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Good Morning Mr. Powe:

Thank you for confirmation. No, you do not need to purchase additional NO_X allowances. There were sufficient allowances in the compliance account to cover the increase in emissions for vapor combustor, FIN VC-4.

Thank you,

Marie Mercado, P.E.
Emissions Trading and Banking Programs, MC-163
Office of Air, Air Permits Division, Permit Support Section
512.239.2054
Marie.Mercado@tceq.texas.gov

From: John Powe <J-Powe@lbctt.com>
Sent: Monday, June 24, 2024 9:57 AM
To: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: RE: Notification for LBC Houston Bayport Terminal's MECT Report

Good morning, Ms. Mercado – I was forwarded your message below. I understand the change and the reason for it. We'll have another new VCU come online this year and will use this calculation methodology for it.

In the meantime, do we need to purchase additional NOx credits to cover the 1.66-ton difference? Is there anything else we need to do on our end, beside use this method going forward?

Thank you,

John Powe
Regional Manager – Air Compliance, Freeport Safety

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From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Friday, June 21, 2024 3:36 PM
To: Jeremy Alberty <j-alberty@lbctt.com>
Cc: Gary Cotie <g-cotie@lbctt.com>
Subject: Notification for LBC Houston Bayport Terminal's MECT Report

Dear Jeremy Alberty:

This message regards the Mass Emissions Cap and Trade (MECT) Annual Compliance Report (Project Number 418801) that was submitted on March 25, 2024, for compliance with the 2023 control period.

The weighted emission factor (EF) of 0.053035 pound per million British thermal units (lb/MMBtu) for vapor combustor, facility identification number (FIN) VC-4, was entered into the Emissions Banking and Trading (EBT) database. This weighted EF is based on the company responses provided on June 13, 2024. This revision to the EF increased the emissions for the vapor combustor from 2.96 to 4.62 tons.

If you have any questions, or would like to request a revision to your annual report, please contact me via email or email to our EBT mailbox at ebt@tceq.texas.gov.

Sincerely,

Marie Mercado, P.E.
Work Leader

Texas Commission on Environmental Quality
Emissions Trading and Banking Programs, MC-163
Office of Air, Air Permits Division, Permit Support Section
P.O. BOX 13087
Austin, Texas 78711-3087
512.239.2054
512.239.6188 (Fax)
Marie.Mercado@tceq.texas.gov

How is our customer service? Please complete our online Customer Satisfaction Survey at https://www.tceq.texas.gov/customersurvey.

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

Please consider the environment before printing this email. This email and any files

From:	Marie Mercado
To:	J-ALBERTY@LBCTT.COM
Cc:	G-COTIE@LBCTT.COM; Air_Permits@pcs.hctx.net
Subject:	TCEQ EBT Documents - MECT Report - LBC Houston Bayport Terminal
Date:	Tuesday, July 2, 2024 10:23:00 AM
Attachments:	418801 MECT Annual Report Letter.pdf

Attached: PDF letter

Please see the attached EBT document for project number 418801. 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: EBTTL
To: Marie Mercado
Subject: FW: For Review and Approval by 7/2/2024: Audit MECT Report 418801
Date: Friday, June 28, 2024 4:37:57 PM
Attachments: 418801 MECT Technical Review.docx
418801 MECT Annual Report Letter.docx
418801 Project File.pdf
VC-3 MECT Stack Test Report Review.docx
VC-4 MECT Stack Test Report Review.docx

Hi Marie,

I've sent this project up to Daniel, but please note that I corrected a few typos on your technical review. I did not mark them in track changes, as they were minor. Unless there are additional edits from management, please use the attached technical review for your final project.

Thank you,
Melissa

From: EBTTL
Sent: Friday, June 28, 2024 4:36 PM
To: PSSMGR <PSSMGR@tceq.texas.gov>
Cc: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: For Review and Approval by 7/2/2024: Audit MECT Report 418801

Hi Daniel,

Please see the attached documents for Audit MECT Report 418801. Let us know if you have any questions.

Thank you,
Melissa

From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Monday, June 24, 2024 8:40 AM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For Review and Approval by 6/27/2024: Audit MECT Report 418801

Hi Melissa,

Please see the attached documents for audit MECT Report 418801 for your review and approval. The stack test reports are available at H:\EBT\Temp Files\Temp_MM\Audit Reports\418801 MECT Audit - Due 6.21 - MM\418801 Initial.

Thanks,
Marie

From: APDDIR
To: Rebecca Partee; APDDIR
Cc: PSSMGR; EBTTL; Marie Mercado
Subject: RE: For Review and Approval by 7/2/2024: Audit MECT Report 418801
Date: Monday, July 1, 2024 9:35:02 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: Monday, July 1, 2024 9:14 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: FW: For Review and Approval by 7/2/2024: Audit MECT Report 418801

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Monday, July 1, 2024 7:53 AM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: FW: For Review and Approval by 7/2/2024: Audit MECT Report 418801

Please see the attached documents for Audit MECT Report 418801.