

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 3, 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: 3786, 3834, 3835, 3915, 3916 and 4043
Project Number: 419082

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 volatile organic compounds (VOC) emission reduction credits (ERCs) in certificates 3786, 3834, 3835, 3915, 3916 and 4043.

The Texas Commission on Environmental Quality (TCEQ) has determined that as of July 3, 2024, there have been no regulatory changes that decrease the certified amount of ERCs available in certificates 3786, 3834, 3835, 3915, 3916 and 4043. 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 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.

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:	419082	Project Manager:	Emily Furlong
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 3786, 3834, 3835, 3915, 3916, and 4043.

ERC Creditability

Certificate Number 3786, 0.1 tpy VOC

GB Biosciences LLC generated 0.1 tpy of volatile organic compound (VOC) ERCs from the permanent shutdown of an IPN incinerator at the GB Biosciences Greens Bayou Plant in Project Number 415469. The incinerator unit consisted of multiple facilities, including a re-oxidizer (PP-DC101), that produced VOC emissions. The credits are set to expire December 18, 2024.

There have been no prior creditability reviews completed for the certificate.

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 415469 and the submission of this creditability review project. Therefore, Certificate Number 3786 still retains the certified amount of 0.1 tpy and the full amount is available.

Table 1: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
PP-DC101/ GBP016	NSR Permit Number 4893A	Permit was voided 1/21/2021. No changes have been made since the permit was voided.	1/21/2021
	30 TAC Chapter 101 Subchapter F Division 2	The site was subject to reporting emissions events and has permitted MSS activities under §101.211. The rule has not been amended since the credits were generated.	7/30/2015
	30 TAC Chapter 116 Subchapter E	The site was subject to federal hazardous air pollutant programs and the re-oxidizer was connected to the IPN incinerator that has VOC/HAP control efficiency greater than 95% under §116.400. The rule has not been amended since the credits were generated.	2/1/2006

Certificate Number 3834, 0.2 tpy NO_x

GB Biosciences LLC generated 0.2 tpy of nitrogen oxides (NO_x) ERCs from the permanent shutdown of an emergency generator (PC-GE401) and two natural gas furnaces (BA-201S and BA201N) at the GB Biosciences Greens Bayou Plant in Project Number 415513. The credits are set to expire December 18, 2024

There have been no prior creditability reviews completed for this certificate.

Table 2 below lists the regulations that were evaluated in this project. There have been no new regulatory provisions that would have affected the facilities since Project Number 415513 and the submission of this creditability review project. Therefore, Certificate Number 3834 still retains the certified amount of 0.2 tpy and the full amount is available.

Table 2: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All	NSR Permit Number 4893A	Permit was voided 1/21/2021. No changes have been made since the permit was voided.	1/21/2021
BA-201S/ GBP005 BA-201N /GBP013	30 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 via trade project 416159, as required by the program.	6/25/2015
BA-201S/ GBP005 BA-201N /GBP013	30 TAC Chapter 117 Subchapter B Division 3 §117.340(p)(2)(A)	The site met continuous demonstration of compliance while in operation by adhering to testing and retesting notification requirements. The amendments to the rules did not change the retesting requirements set forth in §117.340(p)(2)(A).	5/16/2024
BA-201S/ GBP005 BA-201N/ GBP013	30 TAC Chapter 117 Subchapter G Division 1 §117.8000	The facility met the stack test requirements as defined in §117.8000. There have been no amendments to the requirements since the credits were generated.	3/26/2020
PC-GE401/ GBP007	30 TAC Chapter 117 Subchapter B Division 3 §117.310	The facility was exempt from the emission specifications for attainment demonstration per §117.303. There have been no amendments to the exemption requirements since the credits were generated.	5/16/2024
PC-GE401/ GBP007	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.	6/25/2015

Certificate Number 3835, 1.9 tpy VOC

GB Bioscience LLC generated 1.9 tpy of VOC ERCs from the permanent shutdown of seven facilities at the GB Biosciences Greens Bayou Plant in Project Number 415513. The seven facilities include equipment leak fugitives (P-P01), a vent (PP-F5FB206), natural gas furnaces (BA-201S and BA201N), a vertical fixed roof tank (PP-FA204B), a flaker (PP-PA201), and a heavy ends baghouse control device (PP-JD202). The credits are set to expire December 18, 2024.

There have been no prior creditability reviews completed for this certificate.

Table 3 below lists the regulations that were evaluated in this project. There have been no new regulatory provisions that would have affected the facilities since Project Number 415513 and the submission of this creditability review project. Therefore, Certificate Number 3835 still retains the certified amount of 1.9 tpy and the full amount is available.

Table 3: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All	NSR Permit Number 4893A	Permit was voided 1/21/2021. No changes have been made since the permit was voided.	1/21/2021
P- PO1/FGBP01	40 CFR Part 60 Subpart VV §60.481	The facility did not meet the definition of an SOCMI facility in §60.481. The definition has not been amended since the credits were generated.	11/16/2007
	40 CFR Part 63 Subpart H §63.169	The valves, pumps, and flanges met the standards in §63.169. The standards have not been amended since the credits were generated.	12/14/2000
P- PO1/FGBP01 PP-F5FB206/ GBP004 PP-FA204B/ GBP024 PP-PA201/ GBP024 PP-JD202/ GBP01	40 CFR Part 63 Subpart MMM §63.1363	The facilities met the definition of an affected source and followed the requirements in §63.1363, which points to 40 CFR Part 63, Subchapter H. The rule has not been amended since the credits were generated.	3/27/2014
	30 TAC Chapter 115 Subchapter D Division 3 §115.357	The facilities are not subject to the rule as the facilities are associated with a wastewater treatment plant and not an oil and gas site.	5/16/2024
	30 TAC Chapter 101 Subchapter H Division 6 §101.392	The site is exempt from the HECT Program under §101.392. The exemption requirements have not been amended since the credits were generated.	6/25/2015
PP-F5FB206/ GBP004 PP-FA204B/ GBP024 PP-PA201/ GBP024 PP-JD202/ GBP031	30 TAC Chapter 115 Subchapter B Division 2 §115.127	A vent gas stream having a combined weight of VOC less than 100 lbs (45.4kg) in any continuous 24-hour period is exempt under §115.127. Amendments made to the rule did not affect the exemption status of the facilities.	5/16/2024
BA-201S/ GBP005 BA-201N/ GBP013	40 CFR Part 63 Subpart DDDDD §63.7500	The facilities met the emission requirements under §63.7500(a)(1), Table 3.2. The requirements are applicable to new or existing boilers or process heaters with heat input capacity of less than 10 million Btu per hour, in a unit designed to burn gas 1 must conduct a tune-up of the boiler or process heater biannually, as specified in §63.7540. The biannual tune up requirements specified in §63.7540 have not been amended since the credits were generated.	10/6/2022
	30 TAC Chapter 101 Subchapter H Division 3 §101.351 §101.359	The site was subject to the MECT Program under §101.351 and met the reporting requirements under §101.359. The rules and requirements have not been amended since the credits were generated.	6/25/2015

Certificate 3915, 0.1 tpy VOC

GB Biosciences LLC generated 0.1 tpy of VOC ERCs from the permanent shutdown of the maintenance paint shop (UF-PS) at the GB Biosciences Greens Bayou Plant in Project Number 416289. The credits are set to expire June 15, 2025.

There have been no prior creditability reviews completed for this certificate.

Table 4 below lists the regulations that were evaluated in this project. There have been no new regulatory provisions that would have affected the facilities since Project Number 416289 and the submission of this creditability review project. Therefore, Certificate Number 3915 still retains the certified amount of 0.1 tpy and the full amount is available.

Table 4: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UF-PS/ GBU041	FOP 2267	Permit was voided 03/1/2021. No changes have been made since the permit was voided.	3/1/2021
	NSR Permit Number 329A	Emissions limits on painting operations. Permit was voided 1/21/2021. No changes have been made since the permit was voided.	1/21/2021
	30 TAC Chapter 115 Subchapter E Division 2 §115.420(a)	The painting operations at the site were not subject to this division. Touch up/repair coating and texture finishing do not fall into the categories listed in §115.420(a). Touch-up and repair coating has been defined under §115.420(c)(CCCC). Although the facility has been defined, there are no new requirements under the division the facility would be subject to.	5/16/2024
	30 TAC Chapter 115 Subchapter E Division 5 §115.451(f)(1)	Painting operations were exempt under §115.451(f)(1). The amendments made to the rule did not change the exemption status of the facility.	5/16/2024
	40 CFR Part 63 Subpart MMM §63.3881(c)(2)	Painting operations for facility maintenance are exempt under §63.3881(c)(2). The exemption requirements have not been amended since the credits were generated.	12/22/2006

Certificate 3916, 1.0 tpy VOC

GB Biosciences LLC generated 1.0 ton of VOC ERCs from the permanent shutdown of the water treatment system (WTS) at the GB Biosciences Greens Bayou Plant in Project Number 416289. The WTS consisted of 8 facilities: WP-R612, WP-S1133, WP-T0611, WP-T6013, WP-T1003, WP-T1020, WT-S603, and WT-T1130. The credits are set to expire December 25, 2025.

There have been no prior creditability reviews completed for this certificate.

Table 5 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 416289 and the submission of this creditability review project. Therefore, Certificate Number 3916 still retains the certified amount of 1.0 tpy and the full amount is available.

Table 5: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All Facilities	NSR Permit Number 19694	VOC emission limits on water treatment system. Permit was voided 1/21/2021. No changes have been made since the permit was voided.	1/21/2021
All Facilities	FOP 2267	Permit was voided 3/1/2021. No changes have been made since the permit was voided.	3/1/2021
WP-R612/ GBW006	40 CFR Part 60 Subpart Kb §60.110b(a)	Tank capacity 7,600 gal (less than 75 m ³), so not an affected facility under this subpart per §60.110b(a). The rule has not been amended since the credits were generated.	1/19/2021
	30 TAC Chapter 115 Subchapter B Division 1 §115.111(a)(1)	Exempt from these requirements with exception of recordkeeping per §115.111(a)(1), because true vapor pressure less than 1.5 psia. Amendments made to the rule did not change the exemption status of the facility.	5/16/2024
WP-S1133/ GBW078	30 TAC Chapter 115 Subchapter B Division 3 §115.132(a)(1)	VOC water separators must have each compartment totally enclosed with all opening sealed. Gauging and sampling devices shall be vapor-tight except during use. The facility was subject to and met the applicable requirements. The amendments made to the rule did not affect the satisfaction of the requirement.	5/16/2024
WP-R612/ GBW006 WP-T0611/ GBW007 WP-T0613/ GBW0013 WP-T1003/ GBW069 WT-S603/ GBW008	30 TAC Chapter 115 Subchapter B Division 4 §115.142 §115.147(2)	Per §115.147(2), wastewater streams with a total annual VOC loading that is less than or equal to 10 Mg is exempt from the requirements of §115.142. The VOC loading for the affected facilities were lower than the 10 Mg limit and were, therefore, exempt from the division's control requirements. Amendments made to both rules did not affect the exemption status of the facilities.	5/16/2024

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
WP-T1020/ GBW073	30 TAC Chapter 115 Subchapter B Division 4 §115.142(3)	According to FOP 2267, in the Beaumont/Port Arthur area, and after December 31, 2002, in the Houston/Galveston area, each properly operated biotreatment unit shall meet the specified requirements of §115.142(3)(A)-(B). GB Bioscience demonstrated that they were in compliance with the requirements in both parts (A) and (B) during the most recent permit renewal (2020) and at the time of credit generation. Amendments made to the rule since the credits were generated had no affect on the facility's compliance with the rule's requirements.	5/16/2024
WT-T1130/ GBW069	30 TAC Chapter 115 Subchapter B Division 1 §115.111(a)(1)	Exempt from these requirements per §115.111(a)(1), because true vapor pressure less than 1.5 psia. Amendments made to the rule did not change the exemption status of the facility.	5/16/2024
	40 CFR Part 60 Subpart Kb §60.112b	§60.112b standard for VOC does not set emission limits. The rule has not been amended since the credits were generated.	10/8/1997

Certificate 4043, 18.4 tpy NO_x

GB Biosciences LLC generated 72.9 tpy of NO_x ERCs from the permanent shutdown of an IPN unit at the GB Biosciences Greens Bayou Plant in Project Number 415469. The IPN unit contained six facilities including a burner (F5-D201), a prefrac/condenser (PA-208), a re-oxidizer (PP-DC101), and three vertical fixed roof tanks (PT-FB201A, PT-FB-201B, and PT-FB301A). Following the credit generation, a portion of Certificate Number 3785 was traded in Project Number 417292. From the original certificate, 26.1 tpy were retained by the generator as Certificate Number 3981. A portion of Certificate Number 3981 was then traded in Project Number 417410. The remaining 18.4 tpy were retained as Certificate Number 4043. There have been no other trades since. The credits are set to expire December 18, 2024.

There have been no prior creditability reviews completed for this certificate or any of its parent certificates.

Table 6 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 415469 and the submission of this creditability review project. Therefore, Certificate Number 4043 still retains the certified amount of 18.4 tpy and the full amount is available.

Table 6: Regulatory Review

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
All facilities	NSR Permit Number 4893A	Permit was voided 1/21/2021. No changes have been made since the permit was voided.	1/21/2021

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
FS-D201/ GBP016	30 TAC Chapter 101 Subchapter H Division 3 §101.351	The MECT Program is not applicable to the burner under §101.351 because the maximum design heat capacity of the Burner has always been less than 40 MMBtu/hr since 1983. There have been no amendments to the rules since the credits were generated.	6/25/2015
	30 TAC Chapter 117 Subchapter B Division 3 §117.310	The burner was exempt from the emission specifications for attainment demonstration per §117.303 because the actual operating heat input of the burner has always been less than 40 MMBtu/hr since 1983.	5/16/2024
	30 TAC Chapter 101 Subchapter F Division 2 §101.211	The site is subject to reporting emission events and has permitted MSS activities under §101.211. There have been no amendments to the rules since the credits were generated.	7/30/2015
	30 TAC Chapter 116 Subchapter E §116.400	The site is subject to federal hazardous air pollutant programs and the IPN incinerator has a VOC/HAP control efficiency greater than 95% under §116.400. There have been no amendments to the rules since the credits were generated.	2/1/2006
	30 TAC Chapter 101 Subchapter F Division 2 §101.211	The site is subject to reporting emission events and has permitted MSS activities under §101.211. There have been no amendments to the rules since the credits were generated.	7/30/2015
	30 TAC Chapter 116 Subchapter E §116.400	The site is subject to federal hazardous air pollutant programs and the prefac/condenser was connected to the IPN incinerator that has a VOC/HAP control efficiency greater than 95% under §116.400. There have been no amendments to the rules since the credits were generated.	2/1/2006
PA-208/GBP016	30 TAC Chapter 101 Subchapter F Division 2 §101.211	The site was subject to reporting emission events and has permitted MSS activities under §101.211. There have been no amendments to the rules since the credits were generated.	7/30/2015
	30 TAC Chapter 116 Subchapter E §116.400	The site was subject to federal hazardous air pollutant programs and the re-oxidizer was connected to the IPN incinerator that has a VOC/HAP control efficiency greater than 95% under §116.400. There have been no amendments to the rules since the credits were generated.	2/1/2006

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
PP-DC101/ GBP016	40 CFR Part 63 Subpart MMM §63.1362	The North (PT-FB201B) and South (PT-FB201A) Distillation Feed Tanks and Ammonium Carbonate Tank (PT-FB301A) were connected to the IPN incinerator that has a VOC/HAP control efficiency greater than 95% under §63.1362. There have been no amendments to the rules since the credits were generated.	3/27/2014
	30 TAC Chapter 101 Subchapter F Division 2 §101.211	The site was subject to reporting emission events and has permitted MSS activities under §101.211. There have been no amendments to the rules since the credits were generated.	7/30/2015
PT-FB201A/ GBP016 PT-FB201B/ GBP016 PT-FB301A/ GBP016	30 TAC Chapter 116 Subchapter E §116.400	The site is subject to federal hazardous air pollutant programs and the feed tank was connected to the IPN incinerator that has a VOC/HAP control efficiency greater than 95% under §116.400. There have been no amendments to the rules since the credits were generated.	2/1/2006

Conclusion

As of the submission date of this project, the ERCs on Certificate Numbers 3786, 3834, 3835, 3915, 3916, and 4043 have not devalued.

07/03/2024 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 419082 STATUS: C DISP CODE: _____
RECEIVED: 05/01/2024 PROJTYPE: BERR ISSUED DT: _____
SUP-DISP DATE: 07/03/2024

STAFF ASSIGNED TO PROJECT:
FURLONG, EMILY

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: VOC
ALLOWANCE0
DELETED DATE:
TONS: 0.10
CERTIFICATE NO.: 3786
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: **0.20**

CERTIFICATE NO.: **3834** 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: **VOC**

ALLOWANCE**0**

DELETED DATE:

TONS: **1.90**

CERTIFICATE NO.: **3835** 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: VOC
ALLOWANCE0
DELETED DATE:
TONS: 0.10
CERTIFICATE NO.: 3915
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:
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	DELETED DATE:	EFFECTIVE YEAR:
DATE ENTERED: 2024-05-06 00:00:00.0	TONS: 1.00	DOLLARS: 0
CONTAMINATE: VOC	CERTIFICATE NO.:	3916 COUNTY : HARRIS
ALLOWANCE0		

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
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	DELETED DATE:	EFFECTIVE YEAR:
DATE ENTERED: 2024-05-06 00:00:00.0		

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

TONS: **18.40** DOLLARS: **0**
CERTIFICATE NO.: **4043** COUNTY : **HARRIS**

TRACKING ACTIVITES

PROJECT SUBMITTED :	05/01/2024	PROJECT RECEIVED BY	05/06/2024	SECTION MANAGER	
		PM :		REVIEW :	07/02/2024
TEAM LEAD REVIEW :	07/02/2024				

Portfolio Detail

Portfolio Number: P3910
Portfolio Name: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492
Company Name: GB BIOSCIENCES 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>7.8</u>	<u>7.8</u>	<u>7.8</u>	<u>7.8</u>	<u>7.8</u>	<u>7.8</u>	<u>7.8</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>-0.3</u>	<u>-0.3</u>	<u>-5.3</u>	<u>-5.3</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	-7.9	-4.3	-0.3	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	<u>-7.8</u>	<u>-4.3</u>	<u>-0.3</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage From Previous Year	<u>1.1</u>	<u>0</u>	<u>3.5</u>	<u>7.5</u>	<u>7.5</u>	<u>7.5</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>-0.1</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>3.5</u>	<u>7.5</u>	<u>7.5</u>	<u>7.5</u>	<u>2.5</u>	<u>2.5</u>
VINTAGE ALLOWANCE BALANCE	<u>1</u>	<u>0</u>	<u>3.5</u>	<u>7.5</u>	<u>7.5</u>	<u>7.5</u>	<u>0</u>

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>

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
3834	NOX	0.20	ERC_RET	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3859	NOX	0.20	ERC_GEN_POINT	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3859	NOX	0.20	ERC_RET	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3865	NOX	0.20	ERC_RET	12/30/3000	10/12/2020	10/12/2025	HARRIS	0
3860	NOX	0.10	ERC_RET	12/30/3000	01/16/2020	01/16/2025	HARRIS	0
3981	NOX	26.10	ERC_SELL	08/29/2022	12/18/2019	12/18/2024	HARRIS	3785
3862	NOX	0.10	ERC_GEN_POINT	12/30/3000	03/20/2020	03/20/2025	HARRIS	0
3863	NOX	0.10	ERC_GEN_POINT	12/30/3000	06/24/2020	06/24/2025	HARRIS	0
3785	NOX	72.90	ERC_GEN_POINT	05/18/2022	12/18/2019	12/18/2024	HARRIS	0
3785	NOX	72.90	ERC_SELL	05/18/2022	12/18/2019	12/18/2024	HARRIS	0
3861	NOX	0.10	ERC_RET	12/30/3000	03/04/2020	03/04/2025	HARRIS	0
3863	NOX	0.10	ERC_RET	12/30/3000	06/24/2020	06/24/2025	HARRIS	0
3864	NOX	0.10	ERC_GEN_POINT	12/30/3000	06/30/2020	06/30/2025	HARRIS	0
3981	NOX	26.10	ERC_RET	08/29/2022	12/18/2019	12/18/2024	HARRIS	3785
3860	NOX	0.10	ERC_GEN_POINT	12/30/3000	01/16/2020	01/16/2025	HARRIS	0
3862	NOX	0.10	ERC_RET	12/30/3000	03/20/2020	03/20/2025	HARRIS	0
3864	NOX	0.10	ERC_RET	12/30/3000	06/30/2020	06/30/2025	HARRIS	0
3834	NOX	0.20	ERC_GEN_POINT	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3861	NOX	0.10	ERC_GEN_POINT	12/30/3000	03/04/2020	03/04/2025	HARRIS	0
3865	NOX	0.20	ERC_GEN_POINT	12/30/3000	10/12/2020	10/12/2025	HARRIS	0
4043	NOX	18.40	ERC_RET	12/30/3000	12/18/2019	12/18/2024	HARRIS	3981

Portfolio Detail

Portfolio Number: P3910
Portfolio Name: GB BIOSCIENCES GREENS BAYOU PLANT - RN100238492
Company Name: GB BIOSCIENCES LLC

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>

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
3835	VOC	1.90	ERC_RET	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3915	VOC	0.10	ERC_GEN_POINT	12/30/3000	06/15/2020	06/15/2025	HARRIS	0
3786	VOC	0.10	ERC_RET	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3866	VOC	2.40	ERC_RET	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3868	VOC	0.10	ERC_GEN_POINT	12/30/3000	03/20/2020	03/20/2025	HARRIS	0
3868	VOC	0.10	ERC_RET	12/30/3000	03/20/2020	03/20/2025	HARRIS	0
3916	VOC	1.00	ERC_RET	12/30/3000	12/25/2020	12/25/2025	HARRIS	0
3835	VOC	1.90	ERC_GEN_POINT	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3867	VOC	0.60	ERC_GEN_POINT	12/30/3000	03/04/2020	03/04/2025	HARRIS	0
3867	VOC	0.60	ERC_RET	12/30/3000	03/04/2020	03/04/2025	HARRIS	0
3916	VOC	1.00	ERC_GEN_POINT	12/30/3000	12/25/2020	12/25/2025	HARRIS	0
3870	VOC	0.10	ERC_GEN_POINT	12/30/3000	08/03/2020	08/03/2025	HARRIS	0
3786	VOC	0.10	ERC_GEN_POINT	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3869	VOC	0.80	ERC_RET	12/30/3000	07/14/2020	07/14/2025	HARRIS	0
3870	VOC	0.10	ERC_RET	12/30/3000	08/03/2020	08/03/2025	HARRIS	0
3869	VOC	0.80	ERC_GEN_POINT	12/30/3000	07/14/2020	07/14/2025	HARRIS	0
3866	VOC	2.40	ERC_GEN_POINT	12/30/3000	12/18/2019	12/18/2024	HARRIS	0
3915	VOC	0.10	ERC_RET	12/30/3000	06/15/2020	06/15/2025	HARRIS	0

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: B1B563B6B0156437130317D4C331E05898E14277332664D3376FFFB6404B3BD

From: [Emily Furlong](#)
To: RLACK@ELEMENTMARKETS.COM
Cc: SETTLEMENTSSUPPORT@ANEWCLIMATE.COM; Air_Permits@pcs.hctx.net; HHDBPCPCentralFiles@houstontx.gov
Subject: TCEQ EBT Documents - ERC Creditability Review - Element Markets Emissions LLC
Date: Wednesday, July 3, 2024 9:16:00 AM
Attachments: [419082 ERC Creditability Review Letter.pdf](#)

Please see the attached EBT document(s) for project number 419082. 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](#); [Emily Furlong](#)
Subject: RE: For Review and Approval by July 3, 2024: ERC Re-Review 419082
Date: Wednesday, July 3, 2024 7:03:16 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: Wednesday, July 3, 2024 6:55 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 July 3, 2024: ERC Re-Review 419082

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: EBTTL <EBTTL@tceq.texas.gov>
Sent: Tuesday, July 2, 2024 1:40 PM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: Emily Furlong <Emily.Furlong@tceq.texas.gov>; PSSMGR <PSSMGR@tceq.texas.gov>
Subject: For Review and Approval by July 3, 2024: ERC Re-Review 419082

Good Afternoon Rebecca,

Please see the attached documents for ERC Re-Review Project Number 419082. It does not appear that any of the ERCs have devalued.

The requestor, Element Markets, is selling the ERCs to Enterprise Products Operating LLC.

Enterprise requires the ERCs to comply with permit offset requirements. They recently notified me that they plan to submit the ERC Intent to Use within the next week and are anticipating the close of this re-review so that they can complete the trade. For this reason, I am requesting approval of this project by July 3.

I again apologize for the short turnaround. This is the second and last ERC re-review for Element Markets. Please let me know if you have any questions.

Thank you!

Melissa