

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: 3865, 3866, 3867, 3868, 3869, and 3870  
Project Number: 419074

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<sub>x</sub>) and volatile organic compounds (VOC) emission reduction credits (ERCs) in certificates 3865, 3866, 3867, 3868, 3869, and 3870.

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 amounts of ERCs available in certificates 3865, 3866, 3867, 3868, 3869, and 3870. Changes to the representations made in the original ERC application or future regulatory actions could affect the amounts of credits available for use in the certificates.

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](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 Joseph Musa at [joseph.musa@tceq.texas.gov](mailto:joseph.musa@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

## Emission Reduction Credit (ERC) Creditability Technical Review

Project Number:	419074	Project Manager:	Joseph Musa
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:	N/A

### Project Overview

Element Markets Emissions, LLC, submitted a Creditability Review of Emissions Credits application on May 1, 2024 for the review of ERC Certificates 3865, 3866, 3867, 3868, 3869, and 3870.

### ERC Creditability

#### Certificate 3865, 0.2 tpy NO<sub>x</sub>

The ERCs in the certificate were certified by GB Biosciences LLC in ERC Generation Project Number 415587 from the permanent shutdown of a diesel-fired engine, FIN UC-FJ2134, at the GB Biosciences Greens Bayou Plant.

No previous ERC re-reviews have been completed on the credits.

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 415587 and the submission of this creditability review project. Therefore, Certificate Number 3865 still retains the certified amount of 0.2 tpy and the full amount is available.

**Table 1: Regulatory Review**

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UC-FJ2134/GBU062	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
UC-FJ2134/GBU062	Title V Federal Operating Permit Numbers 2264, 2265, 2266, and 2267	Permits remain voided.	3/1/2021 2265: 3/12/2021
UC-FJ2134/GBU062	30 TAC Chapter 117, Subchapter B, Division 3 §117.310	The engine met the exemption requirements under §117.303(a)(10); therefore, it was not subject to the emission specifications for attainment demonstration under §117.310.	5/16/2024
UC-FJ2134/GBU062	30 TAC Chapter 101, Subchapter H, Division 3 §101.351	The engine was not applicable to the MECT Program, as it was not subject to the emission specifications for attainment demonstration under 30 TAC §117.310.	6/25/2015

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UC-FJ2134/GBU062	40 CFR Part 60 Subpart Dc §60.40c	Not subject to this regulation because the generator was not a steam generating unit.	2/16/2012
UC-FJ2134/GBU062	40 CFR Part 60 Subpart IIII §60.4200(a)(3)	Not subject to this regulation because the unit was built before 7/11/2005 and was not modified or reconstructed.	6/29/2021
UC-FJ2134/GBU062	40 CFR Part 63 Subpart A §63.1	Applicable to relevant sections of the General Provisions as it was subject to Part 63, Subpart ZZZZ; however, subpart does not have emission requirements.	11/19/2020

### Certificate 3866, 2.4 tpy VOC

The ERCs in the certificate were certified by GB Biosciences LLC in ERC Generation Project Number 415587 from the permanent shutdown of the following facilities at the GB Biosciences Greens Bayou Plant: two process heaters, rated, respectively, at 19.6 and 8.8 MMBtu/hr (FINs EC-H3285 and F3-H315); two expansion vessels (FINs BO-PRI and F2-D1018); four process vents (FINs F3-T1205, F3-T2915, TO-F3D105A, and TP-F3D105); a 6,000-gallon pressure tank (FIN F3-T3530); and two fugitive emission sources (FINs P-B01 and P-T01).

No previous ERC re-reviews have been completed on the credits.

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 415587 and the submission of this creditability review project. Therefore, Certificate Number 3866 still retains the certified amount of 2.4 tpy and the full amount is available.

**Table 2: 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
EC-H3285/GBE001 F3-H315/GBB015	30 TAC Chapter 101 Subchapter H Division 3 §101.351	The heaters were subject to the MECT program and complied with the requirements.	6/25/2015
EC-H3285/GBE001 F3-H315/GBB015	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the Chlorothalonil (CTL) Unit that was subject to Part 60, but the heaters were not applicable to the New Source Performance Standards	11/17/2023

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
		and, therefore, would not be applicable to the general provisions.	
EC-H3285/GBE001 F3-H315/GBB015	40 CFR Part 63 Subpart A §63.1	Applicable to relevant sections of the General Provisions as the units were subject to subpart DDDDD. To comply with this section, the company would have been required to stack test the heaters in accordance with §63.7505(c); otherwise no emission limitations or specifications are specified.	11/19/2020
EC-H3285/GBE001 F3-H315/GBB015	40 CFR Part 63 Subpart FFFF §63.2435(a)	The heaters were not affected facilities per §63.2435(a).	8/12/2020
EC-H3285/GBE001 F3-H315/GBB015	40 CFR Part 63 Subpart MMM §63.1360(a)	The heaters were not affected facilities per §63.1360(a).	3/27/2014
BO-PRI/GBB008 F2-D1018/GBT010	30 TAC Chapter 115 Subchapter B Division 2 §115.127(a)(2)(A)	Exempt from the control requirements of §115.121(a)(1) because the vent gas stream from each unit had a combined weight of VOC less than 100 pounds in any continuous 24-hour period.	5/16/2024
BO-PRI/GBB008 F2-D1018/GBT010	30 TAC Chapter 115 Subchapter B Division 4 §115.140	Not subject to the regulation because the vessels were not part of the wastewater system.	5/16/2002
BO-PRI/GBB008 F2-D1018/GBT010	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but the vessels were not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
BO-PRI/GBB008 F2-D1018/GBT010	40 CFR Part 63 Subpart A §63.1	The standard only applies to sources of HAPs. Both facilities contained no applicable HAPs and, therefore, were not subject to the regulation.	11/19/2020
BO-PRI/GBB008 F2-D1018/GBT010	40 CFR Part 63 Subpart FFFF §63.2435(a)	The heaters were not affected facilities per §63.2435(a).	8/12/2020
BO-PRI/GBB008 F2-D1018/GBT010	40 CFR Part 63 Subpart MMM §63.1360	Not subject to the regulation because emissions from both units did not include HAPs.	3/27/2014
F3-T1205/GBB002 F3-T2915/GBB002	30 TAC Chapter 115 Subchapter B	Exempt from the control requirements of §115.121(a)(1) because the vent gas stream of each unit had a combined weight of VOC	5/16/2024

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
TO-F3D105A/GBT002 TP-F3D105/GBT002	Division 2 §115.127(a)(2)(A)	less than 100 pounds in any continuous 24-hour period.	
F3-T1205/GBB002 F3-T2915/GBB002 TO-F3D105A/GBT002 TP-F3D105/GBT002	30 TAC Chapter 115 Subchapter B Division 4 §115.140	Not subject to the regulation because the vessels were not part of the wastewater system.	5/16/2002
F3-T1205/GBB002 F3-T2915/GBB002 TO-F3D105A/GBT002 TP-F3D105/GBT002	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but the process vents were not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
F3-T1205/GBB002 F3-T2915/GBB002 TO-F3D105A/GBT002 TP-F3D105/GBT002	40 CFR Part 63 Subpart A §63.1	Applicable to relevant sections of the General Provisions as the vents were subject to pesticide active ingredient (PAI) MACT MMM. To comply with this regulation, emissions from the vents were routed to scrubbers.	11/19/2020
F3-T1205/GBB002 F3-T2915/GBB002 TO-F3D105A/GBT002 TP-F3D105/GBT002	40 CFR Part 63 Subpart FFFF §63.2435(a)	Emissions from the vents were routed to scrubbers, which met the requirements of this regulation.	8/12/2020
F3-T1205/GBB002 F3-T2915/GBB002 TO-F3D105A/GBT002 TP-F3D105/GBT002	40 CFR Part 63 Subpart MMM §63.1360	Emissions from the vents were routed to scrubbers, which met the requirements of this regulation.	3/27/2014
F3-T3530/GBB002	30 TAC Chapter 115 Subchapter B Division 2 §115.127(a)(2)(A)	Exempt from the control requirements of §115.121(a)(1) because the vent gas stream had a combined weight of VOC less than 100 pounds in any continuous 24-hour period.	5/16/2024
F3-T3530/GBB002	30 TAC Chapter 115 Subchapter B Division 4 §115.140	Not subject to the regulation because the tank was not part of the wastewater system.	5/16/2002
F3-T3530/GBB002	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but the tank was not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
F3-T3530/GBB002	40 CFR Part 63 Subpart A §63.1	As stated in the Title V Permit: "This facility is a storage tank that does not store organic liquid HAPS, therefore is not considered a storage vessel in Subpart MMM, and thus not subject to Subpart MMM."	11/19/2020
F3-T3530/GBB002	40 CFR Part 63 Subpart FFFF §63.2435(a)	According to the company, the tank was not subject to the regulation. Emissions from the tank were routed to a scrubber.	8/12/2020
F3-T3530/GBB002	40 CFR Part 63 Subpart MMM §63.1360	Not subject to the regulation because the tank did not store organic liquid HAPS.	3/27/2014
P-B01/FGBB01 P-T01/FGBT01	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but both facilities were not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
P-B01/FGBB01 P-T01/FGBT01	40 CFR Part 63 Subpart A §63.1	Applicable to relevant sections of the General Provisions as the facilities were subject to PAI MACT MMM. To comply with this regulation, EPA Method 21 was used for monitoring piping fugitives in accordance with applicable LDAR. For facility P-T01, the components were in heavy liquid service only, and emissions were monitored using the AVO Inspection Program	11/19/2020
P-B01/FGBB01 P-T01/FGBT01	40 CFR Part 63 Subpart FFFF §63.2435(a)	According to the company, both facilities were not subject to the regulation. EPA Method 21 was used for monitoring piping fugitives for facility P-B01 in accordance with the applicable LDAR program. For facility P-T01, the components were in heavy liquid service only, and emissions were monitored using the AVO Inspection Program.	8/12/2020
P-B01/FGBB01 P-T01/FGBT01	40 CFR Part 63 Subpart MMM §63.1360	Complied with the standards for equipment leaks, as specified under §63.1363 of the regulation.	3/27/2014

### Certificate 3867, 0.6 tpy VOC

The ERCs in the certificate were certified by GB Biosciences LLC in ERC Generation Project Number 415587 from the permanent shutdown of a dryer and a fugitive emission source, FINs F6-S0122 and P-M01, at the GB Biosciences Greens Bayou Plant,

No previous ERC re-reviews have been completed on the credits.

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 415587 and the submission of this creditability review project. Therefore, Certificate Number 3867 still retains the certified amount of 0.6 tpy and the full amount is available.

**Table 3: Regulatory Review**

<b>FIN/EPN</b>	<b>Citations and Regulations</b>	<b>Verified</b>	<b>Last Revision Date</b>
F6-S0122/GBM027 P-M01/FGBM01	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
F6-S0122/GBM027 P-M01/FGBM01	Title V Federal Operating Permit Numbers 2264, 2265, 2266, and 2267	Permits remain voided.	3/1/2021 2265: 3/12/2021
F6-S0122/GBM027	30 TAC Chapter 115 Subchapter B Division 2 §115.127(a)(2)(A)	Exempt from the control requirements of §115.121(a)(1) because the vent gas stream had a combined weight of VOC less than 100 pounds in any continuous 24-hour period.	5/16/2024
F6-S0122/GBM027	30 TAC Chapter 117 Subchapter B Division 3 §117.303(a)(5)	Exempt from the MECT Program through the exemption in TAC §117.303(a)(5).	6/14/2007
F6-S0122/GBM027	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but the dryer was not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
F6-S0122/GBM027	40 CFR Part 63 Subpart A §63.1	The generator company indicated that this facility was subject to the sections of the General Provisions as it was subject to MON MACT FFFF. However, upon this creditability review, it does not appear that this dryer is an affected source, per §63.2435. There have no changes to this regulation that would impact the creditability of the ERCs generated from this facility.	11/19/2020
F6-S0122/GBM027	40 CFR Part 63 Subpart MMM §63.1360	The generator company indicated that this facility was subject to the relevant sections of the General Provisions as it was subject to PAI MACT MMM. This regulation does not establish a standard for VOC.	3/27/2014
F6-S0122/GBM027	40 CFR Part 63 Subpart FFFF §63.2435	This facility was not subject to this requirement. As stated in the Title V Permit: "Emission Standard = The vent stream is Group 2 (not designated as Group 1 and	8/12/2020

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
		determined to not be Group 1). Recovery Device = The TRE index is maintained without a recovery device."	
P-M01/FGBM01	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but the facility was not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
P-M01/FGBM01	40 CFR Part 63 Subpart FFFF §63.2435(a)	According to the company, the facility was not subject to the regulation. The facility consisted of only non-monitored components in heavy liquid service.	8/12/2020
P-M01/FGBM01	40 CFR Part 63 Subpart MMM §63.1360	Complied with the applicable requirements of the regulation. The components associated with this facility were in heavy liquid service only. Documentation in the generator project indicates that the AVO LDAR Program was implemented at the site.	3/27/2014

#### **Certificate 3868, 0.1 tpy VOC**

The ERCs in the certificate were certified by GB Biosciences LLC in ERC Generation Project Number 415587 from the permanent shutdown of a boiler, rated at 40 MMBtu/hr, FIN U2-H101, at the GB Biosciences Greens Bayou Plant,

No previous ERC re-reviews have been completed on the credits.

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 415587 and the submission of this creditability review project. Therefore, Certificate Number 3868 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
U2-H101/GBT004	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
U2-H101/GBT004	Title V Federal Operating Permit Numbers 2264, 2265, 2266, and 2267	Permits remain voided.	3/1/2021 2265: 3/12/2021
U2-H101/GBT004	40 CFR Part 60 Subpart A §60.1	Subject to subpart Dc and, therefore, applicable to the general provisions. This subpart does not establish emission	11/17/2023



FIN/EPN	Citations and Regulations	Verified	Last Revision Date
		standards for VOC. There have been no changes to this regulation that would impact the credits generated from this facility.	
U2-H101/GBT004	40 CFR Part 60 Subpart Dc §60.40c	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW). Facility is listed as U2-H0132 in the Title V Permit. Subpart does not establish standard for VOC.	2/16/2012
U2-H101/GBT004	40 CFR Part 63 Subpart FFFF §63.2435(a)	This facility was not a PAI unit; therefore it was not applicable to this regulation.	8/12/2020
U2-H101/GBT004	40 CFR Part 63 Subpart MMM §63.1360	The regulation does not apply to combustion equipment.	3/27/2014

### Certificate 3869, 0.8 tpy VOC

The ERCs in the certificate were certified by GB Biosciences LLC in ERC Generation Project Number 415587 from the permanent shutdown of a plant lab hood, FIN UO-LAB, at the GB Biosciences Greens Bayou Plant, No previous ERC re-reviews have been completed on the credits.

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 415587 and the submission of this creditability review project. Therefore, Certificate Number 3869 still retains the certified amount of 0.8 tpy and the full amount is available.

**Table 5: Regulatory Review**

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UO-LAB/GBU042	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
UO-LAB/GBU042	Title V Federal Operating Permit Numbers 2264, 2265, 2266, and 2267	Permits remain voided.	3/1/2021 2265: 3/12/2021
UO-LAB/GBU042	30 TAC Chapter 115 Subchapter B Division 2 §115.121(a)	The standard applies to vent streams. Vents from the lab are not defined as covered process as described in §115.121(a).	5/16/2024
UO-LAB/GBU042	30 TAC Chapter 115 Subchapter B Division 4 §115.140	No subject to the regulation as it was not a part of the waste-water system.	5/16/2002

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UO-LAB/GBU042	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source contains an affected facility. There was a source in the CTL Unit that was subject to Part 60, but the facility was not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
UO-LAB/GBU042	40 CFR Part 63 Subpart A §63.1	The standard only applies to sources of HAPs. Sources at the CTL Unit were subject, but the facility did not since it contained no applicable HAPs.	11/19/2020
UO-LAB/GBU042	40 CFR Part 63 Subpart FFFF §63.2435(b)	According to the company, the facility was not subject to the regulation. The lab was not an affected source per §63.2435(b).	8/12/2020
UO-LAB/GBU042	40 CFR Part 63 Subpart MMM §63.1360	Not subject to the regulation as it was not a pesticide active ingredient production operation.	3/27/2014

### Certificate 3870, 0.1 tpy VOC

The ERCs in the certificate were certified by GB Biosciences LLC in ERC Generation Project Number 415587 from the permanent shutdown of a vertical, fixed-roof gasoline tank, rated at 1,000 gallons, FIN UT-V9T003, at the GB Biosciences Greens Bayou Plant,

No previous ERC re-reviews have been completed on the credits.

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 415587 and the submission of this creditability review project. Therefore, Certificate Number 3870 still retains the certified amount of 0.1 tpy and the full amount is available.

**Table 6: Regulatory Review**

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UT-V9T003/GBU049	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
UT-V9T003/GBU049	Title V Federal Operating Permit Numbers 2264, 2265, 2266, and 2267	Permits remain voided.	3/1/2021 2265: 3/12/2021
UT-V9T003/GBU049	30 TAC Chapter 115 Subchapter B Division 1 §115.111(a)(8)	Potentially applicable to the regulation but was exempted per §115.111(a)(8) with a storage capacity less than or equal to 1,000 gallons.	5/16/2024

FIN/EPN	Citations and Regulations	Verified	Last Revision Date
UT-V9T003/GBU049	30 TAC Chapter 115 Subchapter B Division 2 §115.121	The standard applies to vent streams and the storage tank was not a vent.	5/16/2024
UT-V9T003/GBU049	30 TAC Chapter 115 Subchapter B Division 4 §115.140	Not subject to the regulation as it was not a part of the wastewater system.	5/16/2002
UT-V9T003/GBU049	40 CFR Part 60 Subpart A §60.1	General provisions apply when any stationary source containing an affected facility. There was a source in the CTL unit subject to Part 60, but the tank was not applicable to the New Source Performance Standards and, therefore, would not be applicable to the general provisions.	11/17/2023
UT-V9T003/GBU049	40 CFR Part 63 Subpart A §63.1	The standard only applies to sources of HAPs. Sources at the CTL Unit were subject, but the tank did not since it contained no applicable HAPs.	11/19/2020
UT-V9T003/GBU049	40 CFR Part 63 Subpart FFFF §63.2435(a)	This facility was a gasoline storage tank, not a manufacturing process unit as specified under §63.2435(b). Therefore, this facility was not subject to this regulation.	8/12/2020
UT-V9T003/GBU049	40 CFR Part 63 Subpart MMM §63.1360	Not subject to the regulation because the tank was not a pesticide active ingredient production operation.	3/27/2014

## Conclusion

As of the submission date of this project, the ERCs on certificates 3865, 3866, 3867, 3868, 3869, and 3870 have not devalued.

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

PROJECT#: 419074      STATUS: C      DISP CODE: \_\_\_\_\_  
RECEIVED: 05/01/2024      PROJTYPE: BERR      ISSUED DT: \_\_\_\_\_  
SUP-DISP DATE: 07/03/2024

STAFF ASSIGNED TO PROJECT:  
MUSA, JOSEPH

PROJECT NOTES:  
.IF POSSIBLE PLEASE PRIORITIZE THE REVIEW.  
[.Copy Of Record](#) from Steers  
.5-6-2024: TO FACILITATE PROCESSING, REQUESTOR AGREED TO SPLIT ERC CREDITABILITY REVIEW 419074 INTO 3 PROJECTS OF 6 CERTIFICATES EACH. THIS IS THE PARENT PROJECT. THE SUPPLEMENTAL PROJECTS FOR THE SPLIT WERE CREATED IN-HOUSE. SEE CREDITABILITY REVIEW PROJECTS 419082 AND 419083.

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.: 3865  
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: <b>2.40</b>	DOLLARS: <b>0</b>
CONTAMINATE: <b>VOC</b>	CERTIFICATE NO.: <b>3866</b>	COUNTY : <b>HARRIS</b>
ALLOWANCE <b>0</b>		

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#### 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	TONS: <b>0.60</b>	DOLLARS: <b>0</b>
CONTAMINATE: <b>VOC</b>		

ALLOWANCE0

CERTIFICATE NO.: 3867 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

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: VOC TONS: 0.10 DOLLARS: 0  
ALLOWANCE0 CERTIFICATE NO.: 3868 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

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: 0.80  
CERTIFICATE NO.: 3869

EFFECTIVE YEAR:  
DOLLARS: 0  
COUNTY : HARRIS

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#### 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: 0.10	DOLLARS: 0
CONTAMINATE: VOC	CERTIFICATE NO.: 3870 COUNTY : HARRIS	
ALLOWANCE0		

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**TRACKING ACTIVITES**

PROJECT SUBMITTED :	05/01/2024	PROJECT RECEIVED BY PM :	05/02/2024	TEAM LEAD REVIEW :	06/28/2024
SECTION MANAGER REVIEW :	07/02/2024				

**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	2018	2019	2020	2021	2022	2023	2024
Penalty from last year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Certified Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances for Offsets	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Future Trade In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Future Trade Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>1953.6</u>	<u>2001.6</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>-372.2</u>	<u>-2001.6</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>0</u>	<u>0</u>	<u>100</u>	<u>500</u>	<u>0</u>	<u>30</u>	<u>50</u>
Current Traded Out	<u>-9</u>	<u>-0</u>	<u>-64.6</u>	<u>-23.9</u>	<u>-0</u>	<u>-20.9</u>	<u>-12</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>1210.9</u>	<u>1603.4</u>	<u>0</u>	<u>35.4</u>	<u>476.1</u>	<u>0</u>	<u>9.1</u>
Vintage Traded In	<u>60</u>	<u>0</u>	<u>1100</u>	<u>1000</u>	<u>1500</u>	<u>1500</u>	<u>0</u>
Vintage Traded Out	<u>-1088.3</u>	<u>-1392.6</u>	<u>-784</u>	<u>-1029.6</u>	<u>-1814.3</u>	<u>-1276.8</u>	<u>-4.5</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	31	0	0	0	0	0	0
<b>CURRENT ALLOWANCE BALANCE</b>	<u>1603.4</u>	<u>0</u>	<u>35.4</u>	<u>476.1</u>	<u>0</u>	<u>9.1</u>	<u>38</u>
<b>VINTAGE ALLOWANCE BALANCE</b>	<u>182.6</u>	<u>210.8</u>	<u>316</u>	<u>5.8</u>	<u>161.8</u>	<u>223.2</u>	<u>4.6</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
<b>BALANCE</b>	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
<a href="#">3284</a>	NOX	0.30	ERC_SELL	08/27/2018	12/22/2015	12/22/2020	LIBERTY	2971
<a href="#">3293</a>	NOX	1.70	ERC_SELL	08/29/2018	10/10/2013	10/10/2018	HARRIS	3233
<a href="#">3880</a>	NOX	1.40	ERC_SELL	08/05/2021	11/01/2018	11/01/2023	HARRIS	3754
<a href="#">3884</a>	NOX	0.20	ERC_BUY	08/05/2021	08/11/2016	08/11/2022	MONTGOMERY	3789
<a href="#">3282</a>	NOX	0.10	ERC_BUY	08/24/2018	05/19/2015	05/19/2020	BRAZORIA	2977
<a href="#">3284</a>	NOX	0.30	ERC_BUY	08/27/2018	12/22/2015	12/22/2020	LIBERTY	2971
<a href="#">3286</a>	NOX	0.40	ERC_SELL	08/27/2018	12/10/2015	12/10/2020	BRAZORIA	2956
<a href="#">3877</a>	NOX	2.30	ERC_SELL	08/05/2021	01/01/2019	01/01/2024	HARRIS	3730
<a href="#">3886</a>	NOX	0.10	ERC_SELL	08/05/2021	10/01/2018	10/01/2023	LIBERTY	3782
<a href="#">3281</a>	NOX	4.90	ERC_SELL	07/19/2018	07/26/2013	07/26/2018	HARRIS	3245
<a href="#">3283</a>	NOX	0.40	ERC_BUY	08/24/2018	06/12/2015	06/12/2020	GALVESTON	3249
<a href="#">3886</a>	NOX	0.10	ERC_BUY	08/05/2021	10/01/2018	10/01/2023	LIBERTY	3782
<a href="#">3980</a>	NOX	46.80	ERC_SELL	06/13/2022	12/18/2019	12/18/2024	HARRIS	3785
<a href="#">3281</a>	NOX	4.90	ERC_BUY	07/19/2018	07/26/2013	07/26/2018	HARRIS	3245
<a href="#">3282</a>	NOX	0.10	ERC_SELL	08/24/2018	05/19/2015	05/19/2020	BRAZORIA	2977
<a href="#">3283</a>	NOX	0.40	ERC_SELL	08/24/2018	06/12/2015	06/12/2020	GALVESTON	3249
<a href="#">3285</a>	NOX	0.20	ERC_SELL	08/27/2018	01/08/2014	01/08/2020	LIBERTY	3192
<a href="#">3881</a>	NOX	8.60	ERC_BUY	08/05/2021	09/28/2018	09/28/2023	BRAZORIA	3545
<a href="#">3980</a>	NOX	46.80	ERC_BUY	06/13/2022	12/18/2019	12/18/2024	HARRIS	3785
<a href="#">4042</a>	NOX	7.70	ERC_SELL	09/02/2022	12/18/2019	12/18/2024	HARRIS	3981
<a href="#">3285</a>	NOX	0.20	ERC_BUY	08/27/2018	01/08/2014	01/08/2020	LIBERTY	3192
<a href="#">3881</a>	NOX	8.60	ERC_SELL	08/05/2021	09/28/2018	09/28/2023	BRAZORIA	3545
<a href="#">4042</a>	NOX	7.70	ERC_BUY	09/02/2022	12/18/2019	12/18/2024	HARRIS	3981
<a href="#">3286</a>	NOX	0.40	ERC_BUY	08/27/2018	12/10/2015	12/10/2020	BRAZORIA	2956
<a href="#">3293</a>	NOX	1.70	ERC_BUY	08/29/2018	10/10/2013	10/10/2018	HARRIS	3233
<a href="#">3877</a>	NOX	2.30	ERC_BUY	08/05/2021	01/01/2019	01/01/2024	HARRIS	3730
<a href="#">3880</a>	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

**Portfolio Detail**

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

**Actual Allowances for Pollutant VOC**

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

**Flexible Allowances for Pollutant VOC**

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

## Sb7 Allowances for Pollutant VOC

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

## DERC >

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
<a href="#">D3729</a>	VOC	42.90	DERC_BUY	12/30/3000	11/15/1992	11/14/1996	HARRIS	D3674

## ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
<a href="#">3232</a>	VOC	41.10	ERC_SELL	09/28/2018	10/01/2013	10/01/2018	KAUFMAN	2876
<a href="#">3857</a>	VOC	0.50	ERC_BUY	07/14/2021	01/18/2021	01/18/2026	HARRIS	3815
<a href="#">3882</a>	VOC	3.20	ERC_BUY	08/06/2021	12/23/2017	12/23/2022	WALLER	3665
<a href="#">3885</a>	VOC	3.70	ERC_SELL	08/05/2021	08/11/2016	08/11/2022	MONTGOMERY	3790
<a href="#">3889</a>	VOC	5.90	ERC_BUY	08/06/2021	02/26/2017	02/26/2022	HARRIS	3246
<a href="#">4022</a>	VOC	0.50	ERC_SELL	09/08/2022	04/01/2020	04/01/2025	FORT BEND	3788
<a href="#">3411</a>	VOC	1.30	ERC_BUY	05/20/2019	06/09/2014	06/09/2019	HARRIS	3068
<a href="#">3888</a>	VOC	0.40	ERC_SELL	08/05/2021	05/08/2018	05/08/2023	BRAZORIA	3852
<a href="#">4022</a>	VOC	0.50	ERC_BUY	09/08/2022	04/01/2020	04/01/2025	FORT BEND	3788
<a href="#">4023</a>	VOC	0.10	ERC_SELL	09/08/2022	01/18/2021	01/18/2026	FORT BEND	3893
<a href="#">4197</a>	VOC	2.90	ERC_SELL	06/21/2024	11/04/2020	11/04/2026	BRAZORIA	4107
<a href="#">3858</a>	VOC	1.80	ERC_BUY	07/14/2021	08/24/2016	08/24/2022	MONTGOMERY	3787
<a href="#">3882</a>	VOC	3.20	ERC_SELL	08/06/2021	12/23/2017	12/23/2022	WALLER	3665
<a href="#">3887</a>	VOC	1.60	ERC_BUY	08/05/2021	10/01/2018	10/01/2023	LIBERTY	3783
<a href="#">3890</a>	VOC	1.50	ERC_BUY	08/06/2021	02/22/2017	02/22/2022	HARRIS	3374
<a href="#">4026</a>	VOC	5.20	ERC_BUY	09/08/2022	11/17/2017	11/17/2022	HARRIS	3994
<a href="#">4026</a>	VOC	5.20	ERC_SELL	09/08/2022	11/17/2017	11/17/2022	HARRIS	3994
<a href="#">4197</a>	VOC	2.90	ERC_BUY	06/21/2024	11/04/2020	11/04/2026	BRAZORIA	4107
<a href="#">3232</a>	VOC	41.10	ERC_BUY	09/28/2018	10/01/2013	10/01/2018	KAUFMAN	2876
<a href="#">3857</a>	VOC	0.50	ERC_SELL	07/14/2021	01/18/2021	01/18/2026	HARRIS	3815
<a href="#">3878</a>	VOC	0.20	ERC_BUY	08/05/2021	11/01/2018	11/01/2023	HARRIS	3734
<a href="#">4076</a>	VOC	1.10	ERC_SELL	12/05/2022	04/01/2020	04/01/2025	FORT BEND	4024
<a href="#">4076</a>	VOC	1.10	ERC_BUY	12/05/2022	04/01/2020	04/01/2025	FORT BEND	4024
<a href="#">4077</a>	VOC	4.30	ERC_BUY	12/05/2022	10/10/2018	10/10/2023	CHAMBERS	3663

<a href="#">4025</a>	VOC	12.30	ERC_BUY	09/08/2022	12/21/2020	12/21/2025	LIBERTY	3759
<a href="#">3411</a>	VOC	1.30	ERC_SELL	05/20/2019	06/09/2014	06/09/2019	HARRIS	3068
<a href="#">3856</a>	VOC	3.80	ERC_BUY	07/14/2021	01/18/2021	01/18/2026	FORT BEND	3798
<a href="#">3856</a>	VOC	3.80	ERC_SELL	07/14/2021	01/18/2021	01/18/2026	FORT BEND	3798
<a href="#">3858</a>	VOC	1.80	ERC_SELL	07/14/2021	08/24/2016	08/24/2022	MONTGOMERY	3787
<a href="#">3879</a>	VOC	0.10	ERC_SELL	08/05/2021	01/01/2019	01/01/2024	HARRIS	3735
<a href="#">3885</a>	VOC	3.70	ERC_BUY	08/05/2021	08/11/2016	08/11/2022	MONTGOMERY	3790
<a href="#">3889</a>	VOC	5.90	ERC_SELL	08/06/2021	02/26/2017	02/26/2022	HARRIS	3246
<a href="#">3890</a>	VOC	1.50	ERC_SELL	08/06/2021	02/22/2017	02/22/2022	HARRIS	3374
<a href="#">3878</a>	VOC	0.20	ERC_SELL	08/05/2021	11/01/2018	11/01/2023	HARRIS	3734
<a href="#">3879</a>	VOC	0.10	ERC_BUY	08/05/2021	01/01/2019	01/01/2024	HARRIS	3735
<a href="#">3887</a>	VOC	1.60	ERC_SELL	08/05/2021	10/01/2018	10/01/2023	LIBERTY	3783
<a href="#">3888</a>	VOC	0.40	ERC_BUY	08/05/2021	05/08/2018	05/08/2023	BRAZORIA	3852
<a href="#">4025</a>	VOC	12.30	ERC_SELL	09/08/2022	12/21/2020	12/21/2025	LIBERTY	3759
<a href="#">4023</a>	VOC	0.10	ERC_BUY	09/08/2022	01/18/2021	01/18/2026	FORT BEND	3893
<a href="#">4077</a>	VOC	4.30	ERC_SELL	12/05/2022	10/10/2018	10/10/2023	CHAMBERS	3663

## 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:** [APDDIR](#)  
**To:** [Rebecca Partee](#); [APDDIR](#)  
**Cc:** [PSSMGR](#); [EBTTL](#); [Joseph Musa](#) 419074  
**Subject:** RE: For Review and Approval by July 3, 2024: ERC Re-Review 419704  
**Date:** Wednesday, July 3, 2024 7:02:01 AM

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Approved.

Samuel Short  
Air Permits Division  
Texas Commission on Environmental Quality  
512 239-5363  
[samuel.short@tceq.texas.gov](mailto:samuel.short@tceq.texas.gov)



How are we doing? Fill out our online customer satisfaction survey  
at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Rebecca Partee <[rebecca.partee@tceq.texas.gov](mailto:rebecca.partee@tceq.texas.gov)>  
**Sent:** Wednesday, July 3, 2024 6:40 AM  
**To:** APDDIR <[APDDIR@tceq.texas.gov](mailto:APDDIR@tceq.texas.gov)>  
**Cc:** PSSMGR <[PSSMGR@tceq.texas.gov](mailto:PSSMGR@tceq.texas.gov)>; EBTTL <[EBTTL@tceq.texas.gov](mailto:EBTTL@tceq.texas.gov)>; Joseph Musa  
<[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)> 419074  
**Subject:** FW: For Review and Approval by July 3, 2024: ERC Re-Review 419704

Good morning, Sam,

Please see the attached for your approval.

Thank you,  
Rebecca

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**From:** EBTTL <[EBTTL@tceq.texas.gov](mailto:EBTTL@tceq.texas.gov)>  
**Sent:** Tuesday, July 2, 2024 8:25 AM  
**To:** Rebecca Partee <[rebecca.partee@tceq.texas.gov](mailto:rebecca.partee@tceq.texas.gov)>  
**Cc:** Joseph Musa <[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)>; PSSMGR <[PSSMGR@tceq.texas.gov](mailto:PSSMGR@tceq.texas.gov)>  
**Subject:** For Review and Approval by July 3, 2024: ERC Re-Review 419704 419074

Good Morning Rebecca,

Please see the attached documents for ERC Re-Review Project Number 419704. 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 apologize for the short turnaround. Please know that we have one more re-review project for Element Markets that is in progress. I am working with the project manager to send it into review today. Please let me know if you have any questions.

Thank you!

Melissa

**From:** [Joseph Musa](#)  
**To:** [Randy Lack](#)  
**Cc:** [settlementsupport@anewclimate.com](mailto:settlementsupport@anewclimate.com)  
**Subject:** TCEQ EBT Document - ERC Creditability Review  
**Date:** Wednesday, July 3, 2024 8:50:00 AM  
**Attachments:** [419074 ERC Creditability Review Letter.pdf](#)

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Please see the attached EBT document for project number 419074. For additional information about this project, visit the [TCEQ EBT Database](#). If you have any questions, please see the contact information in the last paragraph of the attached letter.

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