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AIR CAIR - OLS

40154

0000-0000-0085-5723

AIR / Clean Air Interstate Rule (CAIR)

AIR CAIR

BARNEY M. DAVIS, LP

GP

Applications

Public

6/6/2014 12:00AM

Applications

NOTICE OF OCUMENT QUALITY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

THE QUALITY OF THE FOLLOWING ORIGINAL PAPER DOCUMENT(S) WAS SUCH THAT ALL OR PORTIONS OF THE SCANNED IMAGE

MAY BE DIFFICULT TO READ OR ILLEGIBLE.

Some reasons for poor quality:

There are multiple densities per page, different types of ink, faded document, and some documents are different colors. Many of the photographs, charts, graphs, maps are of poor quality.



Texas Commission on Environmental Quality Clean Air Interstate Rule (CAIR) Application for Nitrogen Oxides (NO_X) Allowance Allocation Received

Form CNA-1 (Page 1) AIR CAIR_ Company:

I. Company Information	BARNEY M. DAVIS, LP					
Company Name: Barney M. Da	ivis, LP	circle one: NUP or GP or SP _APL 20 _ 4 - 0 _ 4 APPLICATIONS				
Mailing Address: 2901 Via Fort	29 pages					
City: Austin	State: TX	Zip Code: 78746				
TCEQ Customer Reference Nur	mber (CN): CN602656472					
II. Site Information						
Site Name: Barney M. Davis Po	ower Station					
Street Address: 4301 Waldron	Road					
Nearest City: Corpus Christi	Zip Code: 78418	County: Nueces				
TCEQ Regulated Entity Referer	nce Number (RN): RN100642040)				
TCEQ Air Account Number (if a	pplicable): NE-0024-E					
CAIR Compliance Account Number: 004939FACLTY						
	III. Technical Contact Information					
III. Technical Contact Infor	mation	PECEIVED				
III. Technical Contact Infor	Control of the Contro	RECEIVED				
	Name: Cecilia Garcia-Rios	DEC 18 2024				
(Mr. ☐ Ms. ☒ Dr. ☐) Contact	Name: Cecilia Garcia-Rios Manager	DEC 18 2024				
(Mr. ☐ Ms. ☑ Dr. ☐) Contact Title: Regional Environmental	Name: Cecilia Garcia-Rios Manager					
(Mr. ☐ Ms. ☑ Dr. ☐) Contact Title: Regional Environmental Mailing Address: 7300 CPL Roa	Name: Cecilia Garcia-Rios Manager ad	DEC 18 2024 TCEQ CENTRAL FILE ROOM				
(Mr. ☐ Ms. ☑ Dr. ☐) Contact Title: Regional Environmental I Mailing Address: 7300 CPL Roa City: Laredo Phone: (956) 763-3510	Name: Cecilia Garcia-Rios Manager ad State: Texas	DEC 18 2024 TCEQ CENTRAL FILE ROOM Zip Code: 78041 E-Mail: cgarciarios@topazpowergroup.com				
(Mr. ☐ Ms. ☑ Dr. ☐) Contact Title: Regional Environmental I Mailing Address: 7300 CPL Roa City: Laredo Phone: (956) 763-3510	Name: Cecilia Garcia-Rios Manager ad State: Texas Fax: (956) 717-5152 sentative or Alternate Contac	DEC 18 2024 TCEQ CENTRAL FILE ROOM Zip Code: 78041 E-Mail: cgarciarios@topazpowergroup.com				
(Mr. ☐ Ms. ☑ Dr. ☐) Contact Title: Regional Environmental I Mailing Address: 7300 CPL Roa City: Laredo Phone: (956) 763-3510 IV. CAIR-Designated Repres	Name: Cecilia Garcia-Rios Manager ad State: Texas Fax: (956) 717-5152 sentative or Alternate Contac	DEC 18 2024 TCEQ CENTRAL FILE ROOM Zip Code: 78041 E-Mail: cgarciarios@topazpowergroup.com				
(Mr. ☐ Ms. ☒ Dr. ☐) Contact Title: Regional Environmental I Mailing Address: 7300 CPL Roa City: Laredo Phone: (956) 763-3510 IV. CAIR-Designated Repres (Mr. ☒ Ms. ☐ Dr. ☐) Contact	Name: Cecilia Garcia-Rios Manager ad State: Texas Fax: (956) 717-5152 sentative or Alternate Contact Name: Mark A. Shepherd	DEC 18 2024 TCEQ CENTRAL FILE ROOM Zip Code: 78041 E-Mail: cgarciarios@topazpowergroup.com				
(Mr. ☐ Ms. ☒ Dr. ☐) Contact Title: Regional Environmental I Mailing Address: 7300 CPL Roa City: Laredo Phone: (956) 763-3510 IV. CAIR-Designated Repres (Mr. ☒ Ms. ☐ Dr. ☐) Contact Title: Vice President EHS	Name: Cecilia Garcia-Rios Manager ad State: Texas Fax: (956) 717-5152 sentative or Alternate Contact Name: Mark A. Shepherd	DEC 18 2024 TCEQ CENTRAL FILE ROOM Zip Code: 78041 E-Mail: cgarciarios@topazpowergroup.com				



Texas Commission on Environmental Quality Clean Air Interstate Rule (CAIR) Application for Nitrogen Oxides (NO_X) Allowance Allocation Form CNA-1 (Page 2)

V. Baseline Heat Input Information for Applicable CAIR NO_x Units **Federal Total Heat Energy Gross Electrical Unit Applicability** Firing Type **Online Year** Year **Unit ID** (in MMBtu) Output (in MWh) 30 TAC §101.506(b)(2)(C) Unit 3 Gas fired 2009 2009 30 TAC §101.506(b)(2)(C) Unit 3 2009 7,642,927/ Gas fired 2010 983,827 Unit 3 30 TAC §101.506(b)(2)(C) 2009 2011 8,264,567 Gas fired 1,064,646 30 TAC §101.506(b)(2)(C) Unit 3 Gas fired 2009 2012 9,764,185 1,253,136 30 TAC §101.506(b)(2)(C) Unit 3 2009 8,517,124 Gas fired 2013 1,106,929 30 TAC §101.506(b)(2)(C) Unit 4 Gas fired 2009 2009 0 / 0 30 TAC §101.506(b)(2)(C) Unit 4 Gas fired 2009 6,876,385 2010 899,556 Unit 4 30 TAC §101.506(b)(2)(C) Gas fired 2009 2011 8,092,698 1,081,929 Unit 4 30 TAC §101.506(b)(2)(C) Gas fired 2009 2012 9,203,058 1,220,943 30 TAC §101.506(b)(2)(C) Unit 4 Gas fired 2009 2013 8,441,165 1,125,841 Via email

Texas Commission on Environmental Quality Clean Air Interstate Rule (CAIR) [CEQApplication for Nitrogen Oxides (NO_X) Allowance Allocation Form CNA-1 (Page 3)

VI. Certification by Authorized CAIR-Designated Representative

Per 40 CFR §96.110(e), each submission under the CAIR NO_X Annual Trading Program shall be submitted, signed, and certified by the CAIR-designated representative for each CAIR NO_X source on behalf of which the submission is made. Please read and sign in ink the following certification statement.

"I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

Signature

Dato

6/3/2014

Note: Original signature in ink is required.

Mail application to:

Emission Banking and Trading Program (MC-206)
Air Quality Division
Texas Commission on Environmental Quality (TCEQ)
P.O. Box 13087
Austin, TX 78711-3087



From: (361) 939-5010 Marcia West Topaz Power Holdings, LLC 4301 Waldron Road

Corpus Christi, TX 78418

Origin ID: CRPA

Fedex.



J14101402070326

SHIP TO: (512) 239-1000

BILL SENDER

Air Quality Div. - Emission Banking TCEQ - (MC 206) 12100 Park 35 Circle P.O. Box 13087 AUSTIN, TX 78753

JUN 0 6 2014 TCEQ MAIL CENTER JR

Ship Date: 05JUN14 ActWgt: 1.0 LB CAD: 5233632/INET3490

Delivery Address Bar Code



Ref# Invoice# PO# Dept#

> FRI - 06 JUN AA STANDARD OVERNIGHT

TRK# 7702 0727 1747

A8 MMRA

78753 TX-US AUS



522G3/A26D/F220





From: Garcia-Rios, Cecilia <cgarciarios@topazpowergroup.com>

Sent: Tuesday, July 08, 2014 1:00 PM

To: Marie Mercado

Cc: 'mshepherd@tpmlp.com'; Garcia-Rios, Cecilia

Subject: RE: 2018 through 2022 CAIR allocations: Barney M. Davis Power Station, RN100642040

(Respond by COB on Wednesday, June 9, 2014)

Marie,

We concur with your understating. The facility generates steam only for the purpose of electricity and does not sell thermal energy. Below is a brief description of the site's combined cycle combustion turbines with HRSG.

Combined Cycle Combustion Turbines and Duct-Fired HRSGs (EPNs BMD3 and BMD4)

The Barney M. Davis Power Station utilizes two (2) natural gas fired combustion turbines and duct-fired heat recovery steam generators (HRSGs) to produce electricity. Ambient air is drawn through an air filtration intake structure through a chiller coil, then into the inlet compressor section of the combustion turbine. After compression, the air is mixed with natural gas and burned in the combustors, which exhausts the hot gases through rows of stationary vanes and rotating blades. These hot exhaust gases turn the turbine and drive a generator to produce electric power for distribution. The exhaust gases from each combustion turbine then pass through an HRSG where boiler feed water is converted into steam. Each HRSG is equipped with duct burners to provide additional heat input to the combustion gases used to generate steam. The steam is used to drive the existing steam turbine that produces a nominal 350 MW of electricity. Collectively, the combustion turbine generators, HRSGs and steam turbine generator form a combined cycle power facility. Combined cycle operation incorporates a two-on-one configuration, two combustion turbine/ductfired HRSG sets with one steam turbine, to provide for a nominal generating capacity of 700 MW with the operation of the duct burners. The combustion turbine and duct burners are fueled solely with natural gas. Typical operation consists of the combustion turbine and HRSG units operating at various loads with intermittent supplemental firing. The units operate up to 8,760 hours per year. The duct burners are fired to allow the facility to respond to fluctuations of electrical load demand while operating the turbine at 50% to 100% load. DLN burner technology in the combustion turbine, coupled with low-NOX duct burners including flue gas recirculation and Selective Catalytic Reduction (SCR) are used to minimize nitrogen oxide (NOX) emissions. The operation of the SCR involves the injection of ammonia into the exhaust gas stream ahead of a catalyst bed. In addition, an oxidation catalyst is installed to minimize emissions of carbon monoxide (CO) and volatile organic compounds (VOC) from the combustion of natural gas. NOx, CO and oxygen emissions from Units 3 and 4 are monitored by continuous emissions monitoring system (CEMS).

If you have any additional questions, do not hesitate to contact Mark Shepherd at (512) 314-8624 or myself at (956) 763-3510.

Thanks, Cecilia

Cecilia Garcia-Rios

Regional Environmental Manager

Topaz Power | Barney Davis Energy Center | Nueces Bay Energy Center | Laredo Energy Center

Mobile - 956.763.3510 | cgarciarios@topazpowergroup.com

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Tuesday, July 08, 2014 12:16 PM

To: Garcia-Rios, Cecilia **Cc:** 'mshepherd@tpmlp.com'

Subject: 2018 through 2022 CAIR allocations: Barney M. Davis Power Station, RN100642040 (Respond by COB on

Wednesday, June 9, 2014)

Per my discussion this afternoon with Mr. Shepherd, it was determined that your site's unit's applicability is 30 TAC 101.506(b)(3)(A), because you only generate steam for the purpose of electricity. The units at this site are combined cycle combustion turbines with HRSG. **Please concur via e-mail that my understanding is correct.** If this correct, no additional information is needed for this site.

Note that the only apparent difference between 30 TAC 101.506(b)(2)(A) and 30 TAC 101.506(b)(3)(A) is the applicable control periods.

Thanks, Marie

From:

Espinoza, Elda < ElEspinoza@brownsville-pub.com>

Sent:

Wednesday, June 18, 2014 4:45 PM

To:

Marie Mercado

Cc:

Gomez, Alberto; Capistran, Ramiro

Subject:

RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through

2022 General Pool Allocations

Marie,

We have reviewed and verified that EPA data is correct for Unit 9 and Unit 10 Silas Ray Power Plant ORISPL 3559. Please contact me if you need additional information.

Elda M. Espinoza Regulatory Compliance Specialist Brownsville PUB 956.983.6232 elespinoza@brownsville-pub.com

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Friday, May 23, 2014 12:53 PM

To: Gomez, Alberto; andy.ramirez@epelectric.com; anthony.ligato@calpine.com; becky.s.pietras@usa.dupont.com; ben.carmine@nrgenergy.com; bill.kelly@calpine.com; bill.tyus@gdfsuezna.com; cawthomr@airproducts.com; chris.simpson@calenergy.com; cmhobson-DR@southernco.com; craig.eckberg@nrgenergy.com; crh@portofplpc.com; bstout@beablackhawk.com; daniel.inemer@exeloncorp.com; darin.l.fields@p66.com; darren.a.swisher@exxonmobil.com; David.Low@xcelenergy.com; david.m.gorsich@exxonmobil.com; david.mcdonald@calpine.com; Dean.Metcalf@xcelenergy.com; dean.thrall@calpine.com; djrachels@eastman.com; dnitschke@pandashermantx.com; doug.fritsch@lcra.org; eddh@gtpower.com; edward.lesh@constellation.com; ESENAC@entergy.com; etoufar@pandatempletx.com; fabian.camacho@fpl.com; gary.kowalczyk@fpl.com; gclark@camstex.com; glenn.smylie@calenergy.com; gmiller@btutilities.com; greg.basinger@lonestargen.com; greg.johnson@airliquide.com; greg.mach@gdfsuezna.com; grtieken@cpsenergy.com; gscienski@lspower.com; gzheng@lpandl.com; james.d.deloney@conocophillips.com; jamie.sayle@optimenergy.com; janh@texasmpa.org; japackard@stec.org; jason.jin@aes.com; jason.miller@airliquide.com; jchendricks@aep.com; jeffery.callahan@calpine.com; jerome.svatek@lonestargen.com; jeutizi@smeci.net; jgrider@geus.org; jimmy.havins@lcra.org; jkanive@wayzpartners.com; jmeriwether@gpltexas.org; jmmcmanus@aep.com; john.hambrick@exeloncorp.com; John.Stuart@gdfsuezna.com; John.Tissue@exeloncorp.com; john-rbobby.laughlin@usa.dupont.com; jpippin@gsec.coop; jwalsh@wayzpartners.com; jwbrough@marathonpetroleum.com; kathleen.garrett@austinenergy.com; kbabb@texasmpa.org; kenny.draper@gdfsuezna.com; kent.dawson@lcra.org; kfletcher@ppmsllc.com; kfrench@lspower.com; kourpadt@airproducts.com; krstoker@cpsenergy.com; kurt.wiedenfeld@gdfsuezna.com; kwarren@geus.org; lcarlson@tenaska.com; majohnson@calpine.com; mark.adams@directenergy.com; mark.vest@lonestargen.com; MBurr@gpltexas.org; mglover@entergy.com; mhering@btutilities.com; mike.coffman@gdfsuezna.com; mike.knisley@gdfsuezna.com; mkadon@pandashermantx.com; mkezar@smeci.net; mlindsey@camstex.com; mmeyers@brazoselectric.com; monte.gottier@lcra.org; mshepherd@tpmlp.com; mwolske@ppmsllc.com; nduperron@topazpowergroup.com; neal.coffey@gdfsuezna.com; nrahn@cpv.com; patrickb@calpine.com; randall.snyder@nexteraenergy.com; ravi.joseph@austinenergy.com; RBakondy@camstex.com; Capistran, Ramiro; rfederw1@luminant.com; rlatham@calpine.com; robert.stevens@gdfsuezna.com; roberto.lira@directenergy.com;

rodney.kapavik@gdfsuezna.com; roger.chacon@epelectric.com; ronald.reynolds@gdfsuezna.com; rpopejoy@gsec.coop; rsanchez@odessapower.com; ryant@gtpower.com; sam.weaver@calpine.com; sbottelbergh@marathonpetroleum.com; scomenskyADR@southernco.com; scott.mcgillicuddy@calpine.com; scott.parker@calpine.com; shausman@pandatempletx.com; steve.horn@luminant.com; steven.bates@gdfsuezna.com; szant@brazoselectric.com; thevrin@camstex.com; thomas.callaghan@lonestargen.com; tjonas@tenaska.com; wayne.whitehead@nrgenergy.com; wgrnwldt@eastman.com; wwalker@calpine.com; khuyen.nguyen@nrgenergy.com; 'liz.kashi@nrgenergy.com'

Cc: Lindley Anderson; Brandon Greulich

Subject: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Importance: High

This message is being sent to all Texas Clean Air Interstate Rule (CAIR) designated representatives and alternates with email addresses listed with the United States Environmental Protection Agency's Air Markets Program:

This e-mail is specifically for sites with electric generating units (EGU) that are expecting to receive 2018 through 2022 CAIR general pool allocations. Review and respond by June 23, 2014.

Please review, verify, and provide all information in the tables associated with your facilities. The tables are provided as follows in the pdf:

Page 1 through Page 4: 30 TAC §101.506(a)(2) - Baseline Heat Inputs for Units Commencing Operation Before 2001

· Verify data. If EPA data is wrong, please provide correct data and explain why it is incorrect. Note that we cannot allocate on heat input data higher than what was reported to EPA.

Page 5 through Page 6: Units Commencing Operation before 2001, but did not Operate in 2009 through 2013

· If the facility is listed on pages 5 and 6, they will not receive allocations.

Page 7 through Page 8: 30 TAC §101.506(b)(3)(A) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

· Verify data. If EPA data is wrong, please provide correct data and explain why it is incorrect. Note that we cannot allocate on gross electrical output data higher than what was reported to EPA.

Page 9: 30 TAC §101.506(b)(3)(C) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

· Verify data and provide missing data (example: steam data). If EPA data is incorrect, please provide correct data and explain why it is wrong. Note that we cannot allocate on data higher than what was reported to EPA.

Page 10:Units Commencing Operation in or after 2001 submitting a Form CNA-1 by May 1, 2014*

· We have only received the applications for facilities highlighted in yellow. If we have not received your application it is late. Please submit as soon as possible.

NOTE: 2013 data was preliminary according to EPA's Air Markets Program Data website for all facilities at the time that this data was pulled. Please provide complete data, as appropriate. This data will be verified with EPA's data.

If you have questions or comments, please contact me by phone at (512) 239-2054 or by e-mail at Marie.Mercado@tceq.texas.gov<mailto:Marie.Mercado@tceq.texas.gov>. Please include "CAIR, EPA Data Verification" in the e-mail subject line.

Thanks,

Marie Mercado, P.E. Engineer II

Texas Commission on Environmental Quality Emissions Trading and Banking Program, MC-206 Office of Air, Air Quality Division PO BOX 13087 Austin, Texas 78711-3087 512.239.2054 (Direct) 512.239.6188

Marie.Mercado@tceq.texas.gov<mailto:Marie.Mercado@tceq.texas.gov>

From:

Patrick Blanchard < Patrick.Blanchard@calpine.com >

Sent:

Friday, July 18, 2014 12:58 PM

To:

Marie Mercado

Subject:

Calpine CAIR Units Follow UP

Ms. Mercado,

Per our discussion earlier this week, Calpine has no changes to the reported data to EPA and confirms the thermal data as previously provided. As discussed, the thermal data does not include steam production used for power generation.

Please let me know if you need anything additional.

Patrick Blanchard
Calpine Corporation
717 Texas Avenue, suite 1000,
Houston, Texas 77002
| p | 713.830.8717 | e | patrickb@calpine.com

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From:

Patrick Blanchard < Patrick.Blanchard@calpine.com>

Sent:

Monday, July 14, 2014 5:00 PM

To:

Marie Mercado

Subject:

RE: CAIR, EPA Data Verification

Ms Mercado,

You are correct, the information listed at Gross Electric Output erroneously reflects heat input. Calpine will correct this error as well as verify the steam energy values and provide an updated submittal ASAP.

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Monday, July 14, 2014 9:11 AM

To: Patrick Blanchard

Subject: RE: CAIR, EPA Data Verification

Thank you for your response. With regard to the Gross Electrical Output provided in the spreadsheet, it appears that these values reflect Heat Input in MMBtu and not Gross electrical output in MWh. Please advise if this is correct.

Thanks, Marie

From: Patrick Blanchard [mailto:Patrick.Blanchard@calpine.com]

Sent: Tuesday, July 01, 2014 10:31 AM

To: Marie Mercado

Subject: RE: CAIR, EPA Data Verification

Ms. Mercado,

We have reviewed the data provided and found it consistent with the data reported to EPA for each of our sites and have no updates.

With regard to the requested to update 2009 though 2013 Steam Head Energy, please find attached a spreadsheet containing the the requested information for the affected Calpine Co-generation facilities. Steam Heat Energy in this spreadsheet reflects actual thermal energy exported to a third party site- (e.g. an adjacent refinery or petrochemical complex.

Please let me know if you have any questions regarding this information or if I can provide any additional data.

Regards,

Patrick Blanchard

From: Marie Mercado [Marie.Mercado@tceq.texas.gov]

Sent: Tuesday, June 24, 2014 12:30 PM

To: Patrick Blanchard

Subject: RE: CAIR, EPA Data Verification

An excel spreadsheet is acceptable. Also, please provide supporting documentation, such as conversion factors (including the source of the conversion factor), and any other documentation that will allow me to verify the data provided. (i.e. source of monitoring)

Thanks, Marie

From: Patrick Blanchard [mailto:Patrick.Blanchard@calpine.com]

Sent: Tuesday, June 24, 2014 7:06 AM

To: Marie Mercado

Subject: CAIR, EPA Data Verification

Ms. Mercado,

What format would you like to have the steam data (Page 9) Provided? Would an excel spreadsheet be acceptable?

I will provide the information for the Calpine facilities today (Baytown, Channel, Corpus and Deer Park)

Patrick Blanchard
Calpine Corporation
717 Texas Avenue, suite 1000, Texas 77002
| p | 713.830.8717 | e | patrickb@calpine.com

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Friday, May 23, 2014 12:53 PM

To:

Cc: Lindley Anderson; Brandon Greulich

Subject: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Importance: High

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Page 5 through Page 6: Units Commencing Operation before 2001, but did not Operate in 2009 through 2013

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"Page 9: 30 TAC §101.506(b)(3)(C) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

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Page 10:Units Commencing Operation in or after 2001 submitting a Form CNA-1 by May 1, 2014*

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Thanks,

Marie Mercado, P.E. Engineer II

Texas Commission on Environmental Quality
Emissions Trading and Banking Program, MC-206
Office of Air, Air Quality Division
PO BOX 13087
Austin, Texas 78711-3087
512.239.2054 (Direct)
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Marie.Mercado@tceq.texas.gov

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From:

Patrick Blanchard < Patrick.Blanchard@calpine.com>

Sent:

Tuesday, July 01, 2014 10:31 AM

To:

Marie Mercado

Subject:

RE: CAIR, EPA Data Verification

Attachments:

Calpine CAIR Steam Production emission 2009 through 2013.xlsx

Ms. Mercado,

We have reviewed the data provided and found it consistent with the data reported to EPA for each of our sites and have no updates.

With regard to the requested to update 2009 though 2013 Steam Head Energy, please find attached a spreadsheet containing the the requested information for the affected Calpine Co-generation facilities. Steam Heat Energy in this spreadsheet reflects actual thermal energy exported to a third party site- (e.g. an adjacent refinery or petrochemical complex.

Please let me know if you have any questions regarding this information or if I can provide any additional data.

Regards,

Patrick Blanchard

From: Marie Mercado [Marie.Mercado@tceq.texas.gov]

Sent: Tuesday, June 24, 2014 12:30 PM

To: Patrick Blanchard

Subject: RE: CAIR, EPA Data Verification

An excel spreadsheet is acceptable. Also, please provide supporting documentation, such as conversion factors (including the source of the conversion factor), and any other documentation that will allow me to verify the data provided. (i.e. source of monitoring)

Thanks, Marie

From: Patrick Blanchard [mailto:Patrick.Blanchard@calpine.com]

Sent: Tuesday, June 24, 2014 7:06 AM

To: Marie Mercado

Subject: CAIR, EPA Data Verification

Ms. Mercado,

What format would you like to have the steam data (Page 9) Provided? Would an excel spreadsheet be acceptable?

I will provide the information for the Calpine facilities today (Baytown, Channel, Corpus and Deer Park)

Patrick Blanchard
Calpine Corporation
717 Texas Avenue, suite

717 Texas Avenue, suite 1000, Texas 77002 | **p** | 713.830.8717 | **e** | <u>patrickb@calpine.com</u>

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Friday, May 23, 2014 12:53 PM

To:

Cc: Lindley Anderson; Brandon Greulich

Subject: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Importance: High

This message is being sent to all Texas Clean Air Interstate Rule (CAIR) designated representatives and alternates with email addresses listed with the United States Environmental Protection Agency's Air Markets Program:

This e-mail is specifically for sites with electric generating units (EGU) that are expecting to receive 2018 through 2022 CAIR general pool allocations. Review and respond by June 23, 2014.

Please review, verify, and provide all information in the tables associated with your facilities. The tables are provided as follows in the pdf:

Page 1 through Page 4: 30 TAC §101.506(a)(2) - Baseline Heat Inputs for Units Commencing Operation Before 2001

• Verify data. If EPA data is wrong, please provide correct data and explain why it is incorrect. Note that we cannot allocate on heat input data higher than what was reported to EPA.

Page 5 through Page 6: Units Commencing Operation before 2001, but did not Operate in 2009 through 2013

• If the facility is listed on pages 5 and 6, they will not receive allocations.

Page 7 through Page 8: 30 TAC §101.506(b)(3)(A) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

• Verify data. If EPA data is wrong, please provide correct data and explain why it is incorrect. Note that we cannot allocate on gross electrical output data higher than what was reported to EPA.

Page 9: 30 TAC §101.506(b)(3)(C) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

 Verify data and provide missing data (example: steam data). If EPA data is incorrect, please provide correct data and explain why it is wrong. Note that we cannot allocate on data higher than what was reported to EPA.

Page 10:Units Commencing Operation in or after 2001 submitting a Form CNA-1 by May 1, 2014*

• We have only received the applications for facilities highlighted in yellow. <u>If we have not received your application it is late. Please submit as soon as possible.</u>

NOTE: 2013 data was preliminary according to EPA's Air Markets Program Data website for all facilities at the time that this data was pulled. Please provide complete data, as appropriate. This data will be verified with EPA's data.

If you have questions or comments, please contact me by phone at (512) 239-2054 or by e-mail at Marie.Mercado@tceq.texas.gov. Please include "CAIR, EPA Data Verification" in the e-mail subject line.

Thanks,

Marie Mercado, P.E. Engineer II

Texas Commission on Environmental Quality

Emissions Trading and Banking Program, MC-206 Office of Air, Air Quality Division PO BOX 13087 Austin, Texas 78711-3087 512.239.2054 (Direct) 512.239.6188 Marie.Mercado@tceq.texas.gov

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Heat Inputs

				2009 Gross	2010 Gross	2011 Gross	2012 Gross	2013 Gross	2009 Steam	2010 Steam	2011 Steam	2012 Steam	2013 Steam
				Electrical	Electrical	Electrical	Electrical	Electrical	Heat Energy				
	Facility	ORIS	Unit	Ouput (MWh	(MMBtu)	(MMBtu)	(MMBtu)	(MMBtu)	(MMBtu)				
-	Baytown Energy Center	55,327	CTG-1	10,039,682	8,609,372	11,299,589	11,994,446	6,418,492	850,264	890,109	1,295,517	1,310,090	784,605
	Baytown Energy Center	55,327	CTG-2	9,203,036	11,023,570	10,153,080	10,580,377	8,203,212	711,530	1,092,288	1,132,504	1,223,604	881,209
	Baytown Energy Center	55,327	CTG-3	11,164,936	12,075,084	11,475,326	11,989,228	12,269,491	826,929	1,288,551	1,259,111	1,415,725/	1,225,159
1	Channel Energy Center	55,299	CTG1	12,940,516	9,985,960	12,217,309	10,074,599	10,128,110	4,218,076	4,402,096	4,656,737	4,406,892	4,320,536/
	Channel Energy Center	55,299	CTG2	10,664,578	8,659,550	10,714,357	9,907,317	10,522,584	3,476,214	3,817,376	4,083,873	4,333,718	4,488,814
1	Corpus Christi Energy Center	55,206	CU1	13,041,619	12,571,186	11,345,418	13,283,475	12,595,470	4,227,272	4,240,453	3,244,507	4,123,252	4,194,183
	Corpus Christi Energy Center	55,206	CU2	11,608,135	11,374,440	14,663,745	10,678,707	8,975,313	3,762,626	3,836,773	4,193,465	3,314,720	2,988,702
-D	Deer Park Energy Center	55,464	CTG1	16,052,272	14,832,305	14,485,402	14,334,264	14,537,647	6,578,374	6,454,272	6,196,065	5,842,657	6,756,498
	Deer Park Energy Center	55,464	CTG2	14,824,115	16,816,020	15,901,800	16,957,441	14,274,333	6,075,064	7,317,485	6,801,922	6,911,865	6,634,120
	Deer Park Energy Center	55,464	CTG3	16,278,825	15,001,345	16,427,959	15,963,466	15,210,558	6,671,218	6,527,829	7,026,984	6,506,721	7,069,239
	Deer Park Energy Center	55,464	CTG4	14,250,311	12,569,196	12,798,672	15,304,933	14,227,942	5,839,913	5,469,481	5,474,573	6,238,302	6,612,559

Notes:

ť . .

Gross Electrical Output were reviewed and the data above represent no changes from that reported to EPA under CAIR/Acid Rain Requirements. Gross electircal output as reported to EPA includes generation from an associated Steam Turbine generator -if any.

Steam Energy reflects actual thermal energy exported to a third party site- (e.g. an adjacent refinery or petrochemical complex. This value does not include any thermal energy consumed on site.

Calpine Facility/Unit	Oris Code	Unit ID
Baytown Energy Center	55327	CTG-1
Baytown Energy Center	55327	CTG-2
Baytown Energy Center	55327	CTG-3
Bosque County Power Plant	55172	GT-1
Bosque County Power Plant	55172	GT-2
Bosque County Power Plant	55172	
Brazos Valley Energy, LP	55357	
Brazos Valley Energy, LP	55357	CTG2
Calpine Hidalgo Energy Center	7762	HRSG1
Calpine Hidalgo Energy Center	7762	HRSG2
Channel Energy Center	55299	CTG1
Channel Energy Center	55299	
Clear Lake Cogeneration	10741	G102
Clear Lake Cogeneration	10741	G103
Clear Lake Cogeneration	10741	G104
Corpus Christi Energy Center	55206	CU1
Corpus Christi Energy Center	55206	CU2
Deer Park Energy Center	55464	CTG1
Deer Park Energy Center	55464	CTG2
Deer Park Energy Center	55464	CTG3
Deer Park Energy Center	55464	CTG4
Freestone Power Generation	55226	GT1
Freestone Power Generation	55226	GT2
Freestone Power Generation	55226	GT3
Freestone Power Generation	55226	GT4
Magic Valley Generating Station	55123	CTG-1
Magic Valley Generating Station	55123	CTG-2
Pasadena Power Plant	55047	CG-1
Pasadena Power Plant	55047	CG-2
Pasadena Power Plant	55047	CG-3
Texas City Cogeneration	52088	GT-A
Texas City Cogeneration	52088	GT-B
Texas City Cogeneration	52088	GT-C

From: Sent: To: Cc:	Albrecht, Ann via RT <ampd-support@camdsupport.com> Wednesday, July 16, 2014 1:25 PM Marie Mercado Johnson.Travis@epa.gov; Branch.Paula@epa.gov; Vansickle.Karen@epa.gov</ampd-support@camdsupport.com>	
Subject:	[AMPD Support #40478] MMercado: Facilities Shutdown	
Marie,		
	at ORIS 3508 are still considered to be operating. However, none of them hav 010. The emissions reports since that time have all been non-operating files.	/e reported
If the units are really retired, the have to submit non-operating em	facility should submit Retired Unit Exemption forms to CAMD. Then they wounissions files every quarter.	uld not
Regards,		
Ann		
20	arie.Mercado@tceq.texas.gov wrote:	
> Ann,		
> After reading this e-mail closer,	I realized that I know this	
> procedure. However, I would		
14 II (000=00=401=14)	red). Would you mind checking into	
> Valley (003508FACLTY)? >		
> Thanks,		
> Marie		
>Original		
> Message	iltaramad	
<pre>> From: Albrecht, Ann via RT [mai > <u>support@camdsupport.com</u>]</pre>	nto.ampu-	
> Sent: Wednesday, July 16, 2014	12:34 PM	
> To: Marie Mercado		
> Cc: Johnson.Travis@epa.gov;		
> Branch.Paula@epa.gov; Vansi	ckle.Karen@epa.gov	
> Subject: [AMPD		
> Support #40478] MMercado:	Facilities Shutdown	
>		
> Marie,		
> Thomas	*	
> There	NADD for viewing shortdown	
> is no specific functionality in A		
facilities. However, generally sAttributes query and a facility	does not show up for a year, then	

```
the facility can be assumed to not be operating and/or not expected
  to report emission to CAMD for one of their administered programs.
>
> To do this, you would go to AMPD (http://ampd.epa.gov/ampd/)
> Queries tab Select All Programs, Facility Attributes Select a Time
  Frame Select a State, if desired
>
> If you have a question about a
  specific facility, I would be more than happy to look into it for
  you.
>
> Regards,
> Ann Albrecht
> AMPD Support
>
>
>
>
>
> On Wed Jul
> 16 13:08:37 2014, KVanSick wrote:
> > Please provide an answer to
> the question below.
>>
>> Thanks,
>>
> > Karen VanSickle
> > U.S.
> EPA
>> Clean Air Markets Division
>> (202) 343-9220
>>
> > From:
> Johnson, Travis
> > Sent: Wednesday, July 16, 2014 1:03 PM
> > To:
> Vansickle, Karen
> > Subject: FW: Facilities Shutdown
>>
> > Hi
> Karen,
>> Is there an easy way to determine if a facility is shut
> down via AMPD?
>> Travis
>>
>> From: Marie Mercado
> [mailto:Marie.Mercado@tceq.texas.gov]
>> Sent: Wednesday, July 16,
> 2014 11:52 AM
```

> > To: Johnson, Travis
> > Subject: Facilities

> Shutdown

>>

```
> > Hi Travis,
>>
> In general, how do I verify that
> a facility is shut down?
>>
> Thanks,
>> Marie
>
> This
> correspondence was sent from SRA International, Inc. which is a
> contractor to the U.S. Environmental Protection Agency.
```

This correspondence was sent from SRA International, Inc. which is a contractor to the U.S. Environmental Protection Agency.

From:

Johnson, Travis < Johnson. Travis@epa.gov>

Sent:

Wednesday, July 16, 2014 12:25 PM

To:

Marie Mercado

Subject:

RE: Facilities Shutdown (Correction...added one site)

Sweetwater (50615)

Unit GT01 - Operating

Unit GT02 - Operating

Unit GT03 - Operating

Although they have not reported emissions data to us since, at least 2011 (possibly before).

Tradinghouse (3506)

Unit 1 - Retired (3/7/2014)

Unit 2 - Retired (3/7/2014)

WB Tuttle (3613)

Units 1, 2, 3, and 4 - Retired

Lake Creek (3502)

Unit 1 - Operating

Unit 2 - Operating

Although they have not reported emissions data to us since, at least 2011 (possibly before).

So, it looks like Sweetwater and Lake Creek haven't operated recently, but haven't submitted official paperwork to retire the units. Also, I believe that you do have access to this information via the <u>CAMD Business System (CBS)</u>. If you are interested, contact Karen VanSickle to get access.

Travis

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Wednesday, July 16, 2014 1:09 PM

To: Johnson, Travis

Subject: RE: Facilities Shutdown (Correction...added one site)

Thanks, Travis. Would you mind confirming if the following sites are shut down?

Facility Name	Account
Sweetwater	050615FACLTY
Tradinghouse	003506FACLTY
WB Tuttle	003613FACLTY
Lake Creek	003502FACLTY

Thank you very much,

Marie

From: Johnson, Travis [mailto:Johnson.Travis@epa.gov]

Sent: Wednesday, July 16, 2014 12:02 PM

To: Marie Mercado

Subject: RE: Facilities Shutdown

Marie -

If it's a source that is under Part 75 reporting, there are a few different ways, the easiest (and most current information) would be for me to look it up on our system.

Travis

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Wednesday, July 16, 2014 11:52 AM

To: Johnson, Travis

Subject: Facilities Shutdown

Hi Travis,

In general, how do I verify that a facility is shut down?

Thanks, Marie

From:

Mona Johnson <mjohnson@camsesparc.com>

Sent:

Friday, June 20, 2014 5:22 PM

To:

Marie Mercado

Cc:

Matthew Lindsey; bfry

Subject:

CAIR, EPA Data Verification

Marie-

We have verified the data for Blackhawk Station (55064) and did not find any errors.

The heat input data that you have represented for Units 1 and 2 is consistent with what we reported to EPA.

Thank you, Mona

Mona Caesar Johnson, P..E. CAMS eSPARC, LLC

1110 NASA Parkway, Suite 212 Houston, TX 77058 Office: 281-333-3339 x201

Cell: 713-540-6821 mjohnson@camsesparc.com

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From:

Mona Johnson <mjohnson@camsesparc.com>

Sent:

Friday, June 20, 2014 5:32 PM

To:

Marie Mercado

Cc:

Matthew Lindsey; Rachal Havens

Subject:

CAIR, EPA Data Verification

Marie-

We have verified the data for the Sabine Cogeneration Facility (55104) and did not find any errors.

The heat input data that you have represented for Units SAB-1 and SAB-2 is consistent with what was reported to EPA.

Thank you, Mona

Mona Caesar Johnson, P.E. CAMS eSPARC, LLC

1110 NASA Parkway, Suite 212 Houston, TX 77058 Office: 281-333-3339 x201

Cell: 713-540-6821 mjohnson@camsesparc.com

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From:

Rodriguez, Angela D. <ADRodriguez@CPSEnergy.com>

Sent:

Tuesday, July 08, 2014 3:51 PM

To:

Marie Mercado Stoker, Kimberly R.

Cc: Subject:

RE: CAIR: Calaveras Lake Plant (J K Spruce), RN100217975 (Please respond by COB

Wednesday, July 9th)

Hello,

The CEMS (Continuous Emissions Monitoring Systems) that gather the data that goes to ECMPS and is reported quarterly to the EPA is tabulated differently than how we track mwhs on our summary sheets. I wouldn't say one is more accurate than the other, just different ways of calculating operating hours. In 2009, the CEMS were not operating yet, so they didn't gather any operating hours or report to EPA (it was not required yet), but we did keep track internally, so I provided the data for 2009. To be consistent, I reported mwhs based on our internal summaries. However, I don't want there to be a discrepancy with EPA, so for purposes of calculating CAIR allowances for Spruce 2, please use the EPA data instead of the mwhs that I provided.

Thank you,

Angela D Rodriguez

Manager, Environmental Planning, Compliance & Sustainability Air Permitting and Compliance Section CPS Energy|Mail Drop 100406|145 Navarro|San Antonio, Texas 78205 (210) 353-4585 | adrodriguez@cpsenergy.com

From: Marie Mercado [mailto:Marie.Mercado@tceg.texas.gov]

Sent: Tuesday, July 08, 2014 3:38 PM

To: Rodriguez, Angela D. **Cc:** Stoker, Kimberly R.

Subject: CAIR: Calaveras Lake Plant (J K Spruce), RN100217975 (Please respond by COB Wednesday, July 9th)

Hi Ms. Rodriguez,

I am concerned about the following discrepancies:

Unit ID	Data	2009	2010	2011	2012	2013
	Reported					
2	Gross Electrical Output (MWh)	11,842	2,834,779	5,257,060	5,703,421	4,014,321
	EPA					
	Gross Load (MWh)	-	2,511,879	5,255,197	5,702,372	4,015,505

Please review these discrepancies and explain, if possible. Also, note that the I cannot grant allocations based on data higher than what was reported to EPA.

Please respond by close of business on Wednesday, July 9, 2014.

Thanks,

Marie Mercado, P.E. Engineer II

Texas Commission on Environmental Quality
Emissions Trading and Banking Program, MC-206
Office of Air, Air Quality Division
PO BOX 13087
Austin, Texas 78711-3087
512.239.2054 (Direct)
512.239.6188
Marie.Mercado@tceq.texas.gov

From:

Rodriguez, Angela D. <ADRodriguez@CPSEnergy.com>

Sent:

Wednesday, May 21, 2014 2:26 PM

To:

Marie Mercado

Subject:

RE: CAIR Form CNA-1 (Page 2) - REVISED

Marie,

As discussed over the phone, I was confused because the instruction sheet for the form CNA-1 and the rule citations did not match, but the citation 30 TAC 101.506 (b)(3)(A) is correct for our boiler. Spruce 2 is a coal fired boiler used to produce electricity, it does not meet (B) or (C), so we fall under (A). The unit does not make any other useful thermal energy for any purpose.

The citation below is correct for our unit:

(A) except as provided in subparagraph (B) or (C) of this paragraph, the converted control period heat input equals the control period gross electrical output of the generator or generators served by the unit multiplied by 7,900 Btu/kWh, if the unit is coal-fired for the year, or 6,675 Btu/kWh, if the unit is not coal-fired for the year, and divided by 1,000,000 Btu/MMBtu, provided that if a generator is served by two or more units, then the gross electrical output of the generator must be attributed to each unit in proportion to the unit's share of the total control period heat input of such units for the year;

Thanks,

Angela D Rodriguez

Manager, Environmental Planning, Compliance & Sustainability Air Permitting and Compliance Section CPS Energy|Mail Drop 100406|145 Navarro|San Antonio, Texas 78205 (210) 353-4585 | adrodriguez@cpsenergy.com

Check out the new *Environmental Awareness* employee training on i-Grid (ENV002) <u>Environmental CBT Course</u>

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Wednesday, May 21, 2014 11:49 AM

To: Rodriguez, Angela D.

Subject: RE: CAIR Form CNA-1 (Page 2) - REVISED

I am sorry but I have additional questions. Will you please describe the facility in the Form CNA-1? How did you determine that 30 TAC 101.506(b)(3)(A) was the appropriate unit applicability?

From: Rodriguez, Angela D. [mailto:ADRodriguez@CPSEnergy.com]

Sent: Wednesday, May 21, 2014 11:02 AM

To: Marie Mercado

Subject: RE: CAIR Form CNA-1 (Page 2)

Good morning,

I may have just made a copy and paste error, since I was filling out forms for all of our units, some that just needed allowances for next year and one for our Spruce 2 unit that needs allowances for the 2018 control period. Yes, please

change it to the appropriate citation for Spruce 2 to get allocations for 2018 to 2022. Sorry for my error, let me know if I need to send in a corrected form or if this email suffices.

Thanks,

Angela D Rodriguez

Manager, Environmental Planning, Compliance & Sustainability Air Permitting and Compliance Section CPS Energy|Mail Drop 100406|145 Navarro|San Antonio, Texas 78205 (210) 353-4585 | adrodriguez@cpsenergy.com

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Wednesday, May 21, 2014 10:56 AM

To: Rodriguez, Angela D.

Subject: CAIR Form CNA-1 (Page 2)

Good Morning Ms. Rodriguez,

I am doing a quick review of your recent Form CNA-1 submittal. You reference 30 TAC 101.506(b)(2)(A) as your unit applicability. However, 30 TAC 101.506(c)(3)(A) appears to be appropriate due to the control period associated with this submission for the 2018 control period. We will be allocating allocations from 2018 to 2022. Please advise.

Thanks,

Marie Mercado, P.E. Engineer II

Texas Commission on Environmental Quality
Emissions Trading and Banking Program, MC-206
Office of Air, Air Quality Division
PO BOX 13087
Austin, Texas 78711-3087
512.239.2054 (Direct)
512.239.6188
Marie.Mercado@tceq.texas.gov

AIR CAIR_GP_ AP_20140501_Applications

Marie Mercado

From:

Johnson, Travis < Johnson. Travis@epa.gov>

Sent:

Tuesday, July 15, 2014 2:22 PM

To:

Marie Mercado

Subject:

RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through

2022 General Pool Allocations

Hi Marie-

I'm sorry, I overlooked responding to this email. Yes, it is EPA's intent to update EPA's database and the information on our website with these heat inputs at the resolution of the "unrelated reporting error".

Hope that clarifies things - Travis

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Wednesday, July 09, 2014 12:23 PM

To: Johnson, Travis

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Hi Travis,

I am sorry for bothering you again, but will you please confirm that it is EPA's intent to update the EPA's database with the heat inputs provided below upon resolution of the "unrelated critical error?"

Thanks,

Marie Mercado, P.E.

Engineer II

Texas Commission on Environmental Quality Emissions Trading and Banking Program, MC-206 Office of Air, Air Quality Division PO BOX 13087 Austin, Texas 78711-3087 512.239.2054 (Direct) 512.239.6188 Marie.Mercado@tceq.texas.gov

From: Johnson, Travis [mailto:Johnson.Travis@epa.gov]

Sent: Thursday, June 26, 2014 2:37 PM

To: Marie Mercado

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Oh, sorry.

	Number of Op. Hours	Total Op. Time (hrs)	Load	Sum of Rpt. HI (mmBtu)
2013 QTR 1 Total	2143	2,140	141,709	2,018,462
2013 QTR 2 Total	2059	2,045	108,354	1,535,628
2013 QTR 3 Total	2200	2,195	125,833	1,811,672
2013 QTR 4 Total	1974	1,972	114,766	1,641,228
2013 Cumulative Total*	8376	8,352	490,662	7,006,989
2013 Ozone Season Total*	3651	3,637	205,155	2,938,675
2012 QTR 1 Total	1885	1,881	121,722	1,731,242
2012 QTR 2 Total	2157	2,156	134,913	2,001,802
2012 QTR 3 Total	1709	1,705	102,285	1,479,458
2012 QTR 4 Total	1559	1,557	93,909	1,327,656
2012 Cumulative Total*	7310	7,299	452,829	6,540,157
2012 Ozone Season Total*	3146	3,141	192,951	2,837,188
2011 QTR 1 Total	2160	2,160	138,320	2,067,466
2011 QTR 2 Total	2182	2,180	126,514	1,958,507
2011 QTR 3 Total	2167	2,166	124,729	1,884,535
2011 QTR 4 Total	1982	1,980	122,589	1,782,821
2011 Cumulative Total*	8491	8,486	512,152	7,693,329
2011 Ozone Season Total*	3631	3,630	206,821	3,171,078

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Thursday, June 26, 2014 1:59 PM

To: Johnson, Travis Cc: JOHNSON, Greg

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Thank you. Will you please provide the data for 2011 also?

From: Johnson, Travis [mailto:Johnson.Travis@epa.gov]

Sent: Wednesday, June 18, 2014 1:54 PM

To: Marie Mercado **Cc:** JOHNSON, Greg

Subject: FW: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Hi Marie,

I have checked annual heat inputs that Greg Johnson provided for Bayou Cogeneration Plant (see below), Unit CG801 and they are correct.

The data doesn't appear in the EPA database due to an unrelated critical 1 error which prohibits use from quality assuring the data. So there is a possibility that the data may change after resolution of the pending issue, but, generally speaking, I believe the heat inputs to be accurate.

Travis

From: JOHNSON, Greg [mailto:Greg.Johnson@airliquide.com]

Sent: Monday, June 09, 2014 2:19 PM **To:** JOHNSON, Greg; Johnson, Travis

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Is this more like what you are looking for, basically the summary pulled off the data base.

From: JOHNSON, Greg

Sent: Monday, June 09, 2014 1:10 PM

To: 'Johnson, Travis'

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Travis, below is the information that came out of the database. I will forward you the confirmation sheets for the last upload for the 2013 year. Let me know if that is what you are looking for.

2011	2012	2013
7,693,329	6,540,158	7,006,990

From: Johnson, Travis [mailto:Johnson.Travis@epa.gov]

Sent: Monday, June 09, 2014 11:29 AM

To: JOHNSON, Greg

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Hi Greg,

What heat input do you calculate for 2011-2013? Can you email me the quarterly emission xml files and I'll check the annual heat inputs?

Thanks, Travis

From:

Johnson, Travis < Johnson. Travis@epa.gov>

Sent:

Thursday, June 26, 2014 2:37 PM

To:

Marie Mercado

Subject:

RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through

2022 General Pool Allocations

Attachments:

Heat Input CEMS_Summary_Export 2011 - 2013 10298.xlsx

Oh, sorry.

	Number of Op. Hours	Total Op. Time (hrs)	Load	Sum of Rpt. HI (mmBtu)
2013 QTR 1 Total	2143	2,140	141,709	2,018,462
2013 QTR 2 Total	2059	2,045	108,354	1,535,628
2013 QTR 3 Total	2200	2,195	125,833	1,811,672
2013 QTR 4 Total	1974	1,972	114,766	1,641,228
2013 Cumulative Total*	8376	8,352	490,662	7,006,989
2013 Ozone Season Total*	3651	3,637	205,155	2,938,675
2012 QTR 1 Total	1885	1,881	121,722	1,731,242
2012 QTR 2 Total	2157	2,156	134,913	2,001,802
2012 QTR 3 Total	1709	1,705	102,285	1,479,458
2012 QTR 4 Total	1559	1,557	93,909	1,327,656
2012 Cumulative Total*	7310	7,299	452,829	6,540,157
2012 Ozone Season Total*	3146	3,141	192,951	2,837,188
2011 QTR 1 Total	2160	2,160	138,320	2,067,466
2011 QTR 2 Total	2182	2,180	126,514	1,958,507
2011 QTR 3 Total	2167	2,166	124,729	1,884,535
2011 QTR 4 Total	1982	1,980	122,589	1,782,821
2011 Cumulative Total*	8491	8,486	512,152	7,693,329
2011 Ozone Season Total*	3631	3,630	206,821	3,171,078

From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]

Sent: Thursday, June 26, 2014 1:59 PM

To: Johnson, Travis **Cc:** JOHNSON, Greg

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Thank you. Will you please provide the data for 2011 also?

From: Johnson, Travis [mailto:Johnson.Travis@epa.gov]

Sent: Wednesday, June 18, 2014 1:54 PM

To: Marie Mercado **Cc:** JOHNSON, Greg

Subject: FW: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool Allocations

Hi Marie,

I have checked annual heat inputs that Greg Johnson provided for Bayou Cogeneration Plant (see below), Unit CG801 and they are correct.

The data doesn't appear in the EPA database due to an unrelated critical 1 error which prohibits use from quality assuring the data. So there is a possibility that the data may change after resolution of the pending issue, but, generally speaking, I believe the heat inputs to be accurate.

Travis

From: JOHNSON, Greg [mailto:Greg.Johnson@airliquide.com]

Sent: Monday, June 09, 2014 2:19 PM **To:** JOHNSON, Greg; Johnson, Travis

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Is this more like what you are looking for, basically the summary pulled off the data base.

From: JOHNSON, Greg

Sent: Monday, June 09, 2014 1:10 PM

To: 'Johnson, Travis'

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Travis, below is the information that came out of the database. I will forward you the confirmation sheets for the last upload for the 2013 year. Let me know if that is what you are looking for.

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To: JOHNSON, Greg

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Hi Greg,

What heat input do you calculate for 2011-2013? Can you email me the quarterly emission xml files and I'll check the annual heat inputs?

Thanks,

Travis

	Number of Op. Hours	Total Op. Time (hrs)	Load	Sum of Rpt. HI (mmBtu)
2013 QTR 1 Total	2143	2,140	141,709	2,018,462
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2011 Ozone Season Total*	3631	3,630	206,821	3,171,078

.

From:

Johnson, Travis < Johnson, Travis@epa.gov>

Sent:

Wednesday, June 18, 2014 1:54 PM

To:

Marie Mercado JOHNSON, Greg

Cc: Subject:

FW: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018

through 2022 General Pool Allocations

Attachments:

GT1 2012 - 2013 Quarterly Summary.csv

Hi Marie,

I have checked annual heat inputs that Greg Johnson provided for Bayou Cogeneration Plant (see below), Unit CG801 and they are correct.

The data doesn't appear in the EPA database due to an unrelated critical 1 error which prohibits use from quality assuring the data. So there is a possibility that the data may change after resolution of the pending issue, but, generally speaking, I believe the heat inputs to be accurate.

Travis

From: JOHNSON, Greg [mailto:Greg.Johnson@airliquide.com]

Sent: Monday, June 09, 2014 2:19 PM **To:** JOHNSON, Greg; Johnson, Travis

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Is this more like what you are looking for, basically the summary pulled off the data base.

From: JOHNSON, Greg

Sent: Monday, June 09, 2014 1:10 PM

To: 'Johnson, Travis'

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

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Г	7,693,329	6,540,158	7,006,990

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Sent: Monday, June 09, 2014 11:29 AM

To: JOHNSON, Greq

Subject: RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Hi Greg,

What heat input do you calculate for 2011-2013? Can you email me the quarterly emission xml files and I'll check the annual heat inputs?

Thanks, Travis

Reporting		No. of Op.	Op. Time	Heat Input	NOx Mass
Period	Value	Hours	(hrs)	(mmBtu)	(tons)
2012 QTR 1	Quarterly Reported	1885	1880.73	1731242	27.2
	Quarterly Calculated	1885	1880.73	1731242	27.2
	Year To Date Reported	1885	1880.73	1731242	27.2
	Year to Date Calculated	1885	1880.73	1731242	27.2
	Ozone Season Reported				
	Ozone Season Calculated				
2012 QTR 2	Quarterly Reported	2157	2155.66	2001802	28.8
	Quarterly Calculated	2157	2155.66	2001802	28.8
	Year To Date Reported	4042	4036.39	3733044	56
	Year to Date Calculated	4042	4036.39	3733044	56
	Ozone Season Reported				
	Ozone Season Calculated				
2012 QTR 3	Quarterly Reported	1709	1705.49	1479458	19.9
	Quarterly Calculated	1709	1705.49	1479458	19.9
	Year To Date Reported	5751	5741.88	5212502	75.9
	Year to Date Calculated	5751	5741.88	5212502	75.9
	Ozone Season Reported				
	Ozone Season Calculated				
2012 QTR 4	Quarterly Reported	1559	1557.37	1327656	22.2
	Quarterly Calculated	1559	1557.37	1327656	22.2
	Year To Date Reported	7710	7299.25	6540158	98.1
	Year to Date Calculated	7310	7299.25	6540158	98.1
	Ozone Season Reported				
	Ozone Season Calculated				
2013 QTR 1	Quarterly Reported	2143	2140.31	2018462	41.4
	Quarterly Calculated	2143	2140.31	2018462	41.4
	Year To Date Reported	2143	2140.31	2018462	41.4
	Year to Date Calculated	2143	2140.31	2018462	41.4
	Ozone Season Reported				
	Ozone Season Calculated				
2013 QTR 2	Quarterly Reported	2059	2045.32	1535628	29.1
	Quarterly Calculated	2059	2045.32	1535628	29.1
	Year To Date Reported	4202	4185.63	3554090	70.5
	Year to Date Calculated	4202	4185.63	3554090	70.5
	Ozone Season Reported				
2012 077 2	Ozone Season Calculated				
2013 QTR 3	Quarterly Reported	2200	2194.73	1811672	32.6
	Quarterly Calculated	2200	2194.73	1811672	32.6
	Year To Date Reported	6402	6380.36	5365762	103.1
	Year to Date Calculated	6402	6380.36	5365762	103.1
	Ozone Season Reported				
2012 075 4	Ozone Season Calculated	1074	1071 01	1644000	25.6
2013 QTR 4	Quarterly Reported	1974	1971.84	1641228	35.6
	Quarterly Calculated	1974	1971.84	1641228	35.6

Year To Date Reported
Year to Date Calculated
Ozone Season Reported
Ozone Season Calculated

8376 8352.2 8376 8352.2 7006990 7006990 138.7 138.7

From:

JOHNSON, Greg < Greg.Johnson@airliquide.com>

Sent:

Friday, May 23, 2014 2:09 PM

To: Cc: Marie Mercado KALAPPA, Aswath

Subject:

RE: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through

2022 General Pool Allocations

Follow Up Flag:

Follow up

Flag Status:

Flagged

Marie, for Bayou Cogeneration Plant CG-801, there are no MMBtu values given for 2011 – 2013. The following table has the data for CG-801.

2011	2012	2013
7,693,329	6,540,158	7,006,990

Thanks

Greg Johnson HSE Specialist Air Liquide Bayport Complex 11777 Bay Area Blvd. Pasadena, TX 77507 281-474-8337 Spoke w/ Me. Johnson.

He will contact EPA-D To

See if values are acceptable

to EPA ? if they can include

in EPA website. He gets

cause message when he enters

From: Marie Mercado [mailto:Marie.Mercado@tceg.texas.gov]

Sent: Friday, May 23, 2014 12:53 PM

To: agomez@brownsville-pub.com; andy.ramirez@epelectric.com; anthony.ligato@calpine.com; becky.s.pietras@usa.dupont.com; ben.carmine@nrgenergy.com; bill.kelly@calpine.com; bill.tyus@gdfsuezna.com; cawthomr@airproducts.com; chris.simpson@calenergy.com; cmhobson-DR@southernco.com; craig.eckberg@nrgenergy.com; crh@portofplpc.com; bstout@beablackhawk.com; daniel.inemer@exeloncorp.com; darin.l.fields@p66.com; darren.a.swisher@exxonmobil.com; David.Low@xcelenergy.com; david.m.gorsich@exxonmobil.com; david.mcdonald@calpine.com; Dean.Metcalf@xcelenergy.com; dean.thrall@calpine.com; djrachels@eastman.com; dnitschke@pandashermantx.com; doug.fritsch@lcra.org; eddh@qtpower.com; edward.lesh@constellation.com; ESENAC@entergy.com; etoufar@pandatempletx.com; fabian.camacho@fpl.com; gary.kowalczyk@fpl.com; gclark@camstex.com; glenn.smylie@calenergy.com; gmiller@btutilities.com; greg.basinger@lonestargen.com; JOHNSON, Greg; greg.mach@qdfsuezna.com; grtieken@cpsenergy.com; gscienski@lspower.com; gzheng@lpandl.com; james.d.deloney@conocophillips.com; jamie.sayle@optimenergy.com; janh@texasmpa.org; japackard@stec.org; jason.jin@aes.com; MILLER, Jason; jchendricks@aep.com; jeffery.callahan@calpine.com; jerome.svatek@lonestargen.com; jeutizi@smeci.net; jgrider@geus.org; jimmy.havins@lcra.org; jkanive@wayzpartners.com; jmeriwether@gpltexas.org; immcmanus@aep.com; john.hambrick@exeloncorp.com; John.Stuart@adfsuezna.com; John.Tissue@exeloncorp.com; john-r-bobby.laughlin@usa.dupont.com; jpjppin@gsec.coop; jwalsh@wayzpartners.com; jwbrough@marathonpetroleum.com; kathleen.garrett@austinenergy.com; kbabb@texasmpa.org; kenny.draper@gdfsuezna.com; kent.dawson@lcra.org; kfletcher@ppmsllc.com; kfrench@lspower.com; kourpadt@airproducts.com; krstoker@cpsenergy.com; kurt.wiedenfeld@gdfsuezna.com; kwarren@geus.org; lcarlson@tenaska.com; majohnson@calpine.com; mark.adams@directenergy.com; mark.vest@lonestargen.com; MBurr@gpltexas.org; mglover@entergy.com; mhering@btutilities.com; mike.coffman@gdfsuezna.com; mike.knisley@gdfsuezna.com; mkadon@pandashermantx.com; mkezar@smeci.net; mlindsey@camstex.com;

mmeyers@brazoselectric.com; monte.gottier@lcra.org; mshepherd@tpmlp.com; mwolske@ppmsllc.com; nduperron@topazpowergroup.com; neal.coffey@gdfsuezna.com; nrahn@cpv.com; patrickb@calpine.com; randall.snyder@nexteraenergy.com; ravi.joseph@austinenergy.com; RBakondy@camstex.com; rcapistran@brownsville-pub.com; rfederw1@luminant.com; rlatham@calpine.com; robert.stevens@gdfsuezna.com; roberto.lira@directenergy.com; rodney.kapavik@gdfsuezna.com; roger.chacon@epelectric.com; ronald.reynolds@gdfsuezna.com; rpopejoy@gsec.coop; rsanchez@odessapower.com; ryant@gtpower.com; sam.weaver@calpine.com; sbottelbergh@marathonpetroleum.com; scomenskyADR@southernco.com; scott.mcgillicuddy@calpine.com; scott.parker@calpine.com; shausman@pandatempletx.com; steve.horn@luminant.com; steven.bates@gdfsuezna.com; szant@brazoselectric.com; thevrin@camstex.com; thomas.callaghan@lonestargen.com; tjonas@tenaska.com; wayne.whitehead@nrgenergy.com; wgrnwldt@eastman.com; wwalker@calpine.com; khuyen.nguyen@nrgenergy.com; 'liz.kashi@nrgenergy.com'

Cc: Lindley Anderson; Brandon Greulich

Subject: Review and Respond by June 23, 2014: CAIR, EPA Data Verification for 2018 through 2022 General Pool

Allocations

Importance: High

This message is being sent to all Texas Clean Air Interstate Rule (CAIR) designated representatives and alternates with email addresses listed with the United States Environmental Protection Agency's Air Markets Program:

This e-mail is specifically for sites with electric generating units (EGU) that are expecting to receive 2018 through 2022 CAIR general pool allocations. Review and respond by June 23, 2014.

Please review, verify, and provide all information in the tables associated with your facilities. The tables are provided as follows in the pdf:

Page 1 through Page 4: 30 TAC §101.506(a)(2) - Baseline Heat Inputs for Units Commencing Operation Before 2001

• Verify data. If EPA data is wrong, please provide correct data and explain why it is incorrect. Note that we cannot allocate on heat input data higher than what was reported to EPA.

Page 5 through Page 6: Units Commencing Operation before 2001, but did not Operate in 2009 through 2013

• If the facility is listed on pages 5 and 6, they will not receive allocations.

Page 7 through Page 8: 30 TAC §101.506(b)(3)(A) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

• Verify data. If EPA data is wrong, please provide correct data and explain why it is incorrect. Note that we cannot allocate on gross electrical output data higher than what was reported to EPA.

Page 9: 30 TAC §101.506(b)(3)(C) - Baseline Heat Inputs for Units Commencing Operation in or after 2001*

Verify data and provide missing data (example: steam data). If EPA data is incorrect, please provide
correct data and explain why it is wrong. Note that we cannot allocate on data higher than what was
reported to EPA.

Page 10:Units Commencing Operation in or after 2001 submitting a Form CNA-1 by May 1, 2014*

• We have only received the applications for facilities highlighted in yellow. If we have not received your application it is late. Please submit as soon as possible.

NOTE: 2013 data was preliminary according to EPA's Air Markets Program Data website for all facilities at the time that this data was pulled. Please provide complete data, as appropriate. This data will be verified with EPA's data.

If you have questions or comments, please contact me by phone at (512) 239-2054 or by e-mail at Marie.Mercado@tceq.texas.gov. Please include "CAIR, EPA Data Verification" in the e-mail subject line.

Thanks,

Marie Mercado, P.E.

Engineer II

Texas Commission on Environmental Quality
Emissions Trading and Banking Program, MC-206
Office of Air, Air Quality Division
PO BOX 13087
Austin, Texas 78711-3087
512.239.2054 (Direct)
512.239.6188
Marie.Mercado@tceq.texas.gov