Brooke T. Paup, *Chairwoman* Bobby Janecka, *Commissioner* Catarina R. Gonzales, *Commissioner* Kelly Keel, *Executive Director* 



# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 17, 2025

TONY KUREK SENIOR FACILITIES MANAGER LINDE INC. 100 STRANG ROAD LAPORTE, TEXAS 77571 Via email

Subject: MECT Annual Compliance Report Linde Inc. Linde La Porte Customer Number: CN600130645 Regulated Entity Number: RN102146446 EBT Portfolio Number: P4030 Project Number: 419648

Dear Tony Kurek:

The Texas Commission on Environmental Quality (TCEQ) has processed the 2024 MECT Annual Compliance Report submitted on March 7, 2025, for compliance with 30 Texas Administrative Code (TAC) §101.359. This processing does not constitute an approval of the emissions quantification methods or results submitted in the site's Annual Compliance Report. A summary of the site's compliance account (portfolio) for the control period is attached.

The person that certified your annual report, Oscar Avila Contreras, is not registered as an Authorized Account Representative (AAR) for this portfolio. An AAR is required to certify (sign) all EBT applications submitted for this portfolio. **Failure to properly certify your EBT applications may cause delays in the review process.** Please review and update your company's AAR contact information through the State of Texas Environmental Electronic Reporting System (<u>STEERS</u>) to ensure that it is accurate. Please complete this review prior to submission of future EBT applications.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

Tony Kurek Page 2 March 17, 2025

Additional information regarding this project and the site's portfolio is available online at <u>https://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt\_dpa.start</u>. If you have questions concerning this project or the EBT program, please contact Natalie Namba at <u>Natalie.Namba@tceq.texas.gov</u>, or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Samuel Short, Deputy Director Air Permits Division Office of Air

cc: Douglas Shearer, Director of Operations, South Region, Linde Inc. Director, Harris County, Pollution Control Services, Pasadena

#### Table 1. Compliance Account Summary.

2024 Control Period	Amount (tons)
Certified Allocation	1.0
Previous Year Deficit with 10% Penalty	0.0
Total Current Allowances Traded In	3.0
Total Current Allowances Traded Out	0.0
Vintage Allowances from Previous Year	1.2
Vintage Allowances Traded In	0.0
Vintage Allowances Traded Out	0.0
Total Reported Emissions	2.7
Quantification Penalty	0.0
Current Allowances Used for Compliance	2.7
Vintage Allowances Used for Compliance	0.0
Deficit	0.0
Vintage Allowances Expired	1.2
Current Allowances Remaining	1.3

# 2024 MECT Annual Compliance Report Technical Review

Project Number:	419648	Project Manager:	Natalie Namba
Customer Reference No.:	CN600130645	Company Name:	Linde Inc.
Regulated Entity Reference No.:	RN102146446	Site Name:	Linde La Porte
Portfolio Number:	P4030	County:	Harris

### **Review Summary**

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

## **General Review**

Review	Yes/No	Explanation
Was the report submitted on or before March 31?	Yes	Date Submitted: 3/7/2025
Was the report certified (submitted) by the portfolio's registered Primary or Alternate Authorized Account Representative (AAR)?	No	Certified by: Oscar Avila Contreras
Are the company and site information consistent with Central Registry?	Yes	
Were any new EPNs reported or did any existing EPNs undergo a change in status (e.g., shutdown, removed, etc.)?	No	
Did the site's account for this control period have sufficient allowances to cover the emissions and any penalties assessed?	Yes	

## **Basic Emissions Review**

Review	Yes/No	Explanation
Were the Level of Activity (LOA) citations, Emission Factor (EF) citations, and Source Type consistent with the previous year's report?	Yes	
Were the LOA and EF units reported for each FIN compatible with each other?	Yes	
Were emissions from one or more FINs reported as using alternate data under §101.354(b)? If yes, was a 10% Quantification Penalty assessed?	No	

#### 03/17/2025 ------ EBTP IMS- PROJECT RECORD ------

PROJECT#: 419648	STATUS: C	DISP CODE:
RECEIVED: 03/07/2025	PROJTYPE: BRPT	ISSUED DT:
		SUP-DISP DATE: 03/17/2025

#### STAFF ASSIGNED TO PROJECT:

NAMBA, NATALIE

#### PROJECT NOTES: .<u>Attachments</u> from Steers .<u>Copy Of Record</u> from Steers .2024 BASIC MECT REPORT .TARGET DATE: 5/6/2025

#### PROJECT TRANSACTIONS

COMPANY DATA COMPANY NAME: LINDE INC CUSTOMER REGISTRY ID: CN600130645

#### PORTFOLIO DATA

NUMBER: P4030 NAME: LINDE INC - PRAXAIR - RN102146446

#### SITE DATA

ACCOUNT: HG0982M REG ENTITY ID: RN102146446 SITE NAME: LINDE LA PORTE COUNTY: HARRIS LOCATION: 100 STRANG RD, LA PORTE, TX

NEAREST CITY: LA PORTE

TITLE: DIRECTOR OF OPERATIONS, SOUTH REGION

TITLE: SENIOR FACILITIES MANAGER

#### CONTACT DATA

NAME: TONY KUREK ROLE: AAR STREET: 100 Strang Road CITY/STATE,ZIP: Laporte, TX , 77571-PHONE: 281-478-7802 -EMAIL: TONY.KUREK@LINDE.COM

NAME: DOUGLAS SHEARER ROLE: AAAR STREET: CITY/STATE,ZIP: PHONE: 925-548-9107 -EMAIL: DOUGLAS.SHEARER@LINDE.COM

#### TRANSACTION DATA

TRANSACTION TYPE:CAP\_RPT EFFECTIVE YEAR: 2024 POLLUTANT : NOX TON: 0.7

# Allowance TypeTotalACTUAL2.7

TRANSACTION TYPE:CAP\_VINT EFFECTIVE YEAR: 2024

POLLUTANT : NOX TON: 1.30

#### TRACKING ACTIVITES

PROJECT RECEIVED BY PM :	03/07/2025 PROJECT SUBMITTED :	03/07/2025 TEAM LEAD REVIEW :	03/11/2025
SECTION MANAGER REVIEW :	03/11/2025 BASIC REPORT :	03/31/2025	

Portfolio Detail ——	
Portfolio Number:	P4030
Portfolio Name:	LINDE INC - PRAXAIR - RN102146446
Company Name:	LINDE INC

# Actual Allowances for Pollutant NOX—

Balance/Year	2022	2023	2024	2025	2026	2027	2028
Penalty from last year	0	0	0	0	0	0	0
Certified Allocation	1	1	1	1	1	1	1
Allowances for Offsets	-0	-0	-0	-0	-0	-0	-0
Future Trade In	0	0	0	0	0	0	0
Future Trade Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	3	3	3	3	3	3	3
Stream Traded Out	-0	-0	-0	-0	-0	-0	-0
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-2.7	-2.8	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	-2.7	-2.8	-0	-0	-0	-0	-0
Vintage From Previous Year	1.4	1.3	1.2	0	0	0	0
Vintage Traded In	0	0	0	0	0	0	0
Vintage Traded Out	-0	-0	-0	-0	-0	-0	-0
Vintage Used for Compliance	-0	-0	-0	-0	-0	-0	-0
DERC Intent	0	0	0	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
CURRENT ALLOWANCE BALANCE	1.3	1.2	4	4	4	4	4
VINTAGE ALLOWANCE BALANCE	1.4	1.3	1.2	0	0	0	0

# Flexible Allowances for Pollutant NOX\_\_\_\_\_

Balance	2022	2023	2024	2025	2026	2027	2028
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0
Associated Annual Emissions	-0	-0	-0	-0	-0	-0	-0
BALANCE	0	0	0	0	0	0	0

# 

Balance/Year	2022	2023	2024	2025	2026	2027	2028
Previous Year Deficit	0	0	0	0	0	0	0
Allowances Remaining from Previous Year	0	0	0	0	0	0	0
Allocation	0	0	0	0	0	0	0
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	0	0	0	0	0	0	0
Stream Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	0	0	0	0	0	0	0

# **Banking Cap and Trade** Portfolio Balance for P4030

Actual Allowances for NO									
Balance/Year	2022	202	3 2024	4 202	5 20	26 2	2027	2028	
Current Balance	1.30	1.20	1.30	4.00	4.00	) 4.0	00	4.00	
Vintage Balances for NOX									
<b>Balance/Year</b>	202	2	2023	2024	2025	2026	2027	2028	
Current Balance	1.40		1.30	1.20	1.30	0	0	0	
Flex permits Allowances for	or NOX								
<b>D</b> - L / <b>N</b> /									
Balance/Year		2022	2023	2024	2025	2026	2027	2028	
Balance/ Year Current Balance		<b>2022</b> 0	<b>2023</b> 0	<b>2024</b> 0	<b>2025</b> 0	<b>2026</b> 0	<b>2027</b> 0	<b>2028</b> 0	
	m					0			
Current Balance		0	0	0	0 Xaction	0 1 <b>Type</b>			
Current Balance Pending Projects Proj_nu	jects	0	0	0	0 Xaction	0 1 Type			
Current Balance Pending Projects Proj_nu Pseudocally Closed Pro	jects	0	0	0	0 Xaction	0 1 Type			

#### Portfolio Number:P4030 Data current as of:03/07/2025

			olio Number: tfolio Name:	P4030 LINDE INC - P	RAXAIR - RN102146446				
			Program:	MECT					
		Proj	ect Number:	419648					
		Pol	lutant Code:	NOX					
		Co	ntrol Period:	2024					
FIN:HEATER1	Fin Name:PL	ANT 1 REGEN HEATER-13	388			EPN:EP-1	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
21490.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.060000	LB/MMBTU	0.64		
FIN:HEATER10	Fin Name:N2	DRIOX 3 VAPORIZER HE	ATER-1396			EPN:EP-10	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
2398.000000	117.2035(a)(1)	MMBTU	117.2035	(e)	0.054000	LB/MMBTU	0.06		
FIN:HEATER11	Fin Name:PL	ANT 3 REGEN HEATER-12	2631			EPN:	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
17497.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.032000	LB/MMBTU	0.28		
FIN:HEATER2	Fin Name:O2	DRIOX 1 VAPRIZOR HEA	TER-1389			EPN:EP-2	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
4164.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.238000	LB/MMBTU	0.50		
FIN:HEATER3	Fin Name:O2	DRIOX 2 VAPRIZOR HEA	TER-1390			EPN:EP-3	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
1934.000000	117.2035(a)(1)	MMBTU	117.2035	(e)	0.264000	LB/MMBTU	0.26		
FIN:HEATER4	Fin Name:O2	DRIOX 3 VAPRIZOR HEA	TER-1391			EPN:EP-4	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
4247.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.187000	LB/MMBTU	0.40		
FIN:HEATER5	Fin Name:O2	DRIOX 4 VAPRIZOR HEA	TER-1392			EPN:EP-5	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
1610.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.173000	LB/MMBTU	0.14		
FIN:HEATER7	Fin Name:PL	ANT 2 REGEN HEATER-77	70			EPN:EP-7	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
16679.000000	117.2035(a)(1)	MMBTU	117.2035	(e)	0.027000	LB/MMBTU	0.23		
FIN:HEATER8	Fin Name:N2	DRIOX 1 VAPRIZOR HEAT	FER-1394			EPN:EP-8	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
1438.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.054000	LB/MMBTU	0.04		
FIN:HEATER9	Fin Name:N2	DRIOX 2 VAPRIZOR HEA	FER-1395			EPN:EP-9	CEMS/	PEMS:No	
LOA	LOA Citation	LOA Units	EF Citati	on	EF	EF Units	Tons Reported		
2547.000000	117.2035(a)(1)	MMBTU	117.2035	i(e)	0.062000	LB/MMBTU	0.08		

#### —Contact Information —

Primary Contact Name: Address: Phone: Email: Technical Contact Name: Phone: Email:

TONY KUREK
 100 Strang Road Laporte, TX 77571
 281-478-7802
 TONY.KUREK@LINDE.COM
 DOUGLAS SHEARER
 925-548-9107
 DOUGLAS.SHEARER@LINDE.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 Oscar Avila Contreras. Signature Hash: 043E18DC44FD3167892FF3F4E89612FEE6C4833E7C693F6E72131B4B3F07771E

The following is additional information contained in your Copy of Record: Submission IP address: 165.225.32.163 Submission date and time: 03/07/2025 Submission STEERS Version: 6.88 Submission Confirmation Number: 18291 Submission Data Hash Code: BCEC7ECC28A703B9DB2CE0BCF03CE2B163C74C21051539A9E9C1567E06147D52

#### Heater Emission Calculations Linde Inc. - La Porte, Texas Facility

2024																														
Emission	Combustion	Heat Input	L	an	F	eb	N	lar		Apr	N	lay		Jun		Jul	,	Aug		Sep		Oct		Nov		Dec	Total	Annual	TEST Emission	Total Annual NOx
Point	Devices	Capacity	Gas	Usage	Ga	s Usage	2024 Ga	as Usage	Factor	Emissions																				
ID No.		(MMBtu/hr)	(MMscf)	(MMBtu)	(MMBtu/yr)	MMSCF/yr	lb/mmbtu	(ton/yr)																						
Regeneratio	n Heaters																													
EP-1	Regen Heater 1	8.00	1.81	1,842.69	1.76	1,799.58	1.84	1,877.80	1.73	1,767.11	1.87	1,909.42	1.82	1,858.70	1.18	1,208.11	1.91	1,948.36	1.87	1,908.32	1.96	1,994.60	1.82	1,861.31	1.48	1,514.50	21,490	21.07	0.060	0.64
EP-7	HEATER 7770	8.00	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	1.36	1,389.88	16,679	16.35	0.027	0.23
EP-11	Regen Heater 3	7.30	1.49	1,518.78	1.32	1,345.38	1.46	1,489.20	1.41	1,435.14	1.44	1,466.76	1.38	1,405.56	1.41	1,442.28	1.42	1,445.34	1.40	1,423.92	1.46	1,491.24	1.44	1,465.74	1.54	1,567.74	17,497	17.15	0.032	0.28
Vaporizer H	eaters																											<u> </u>		
EP-2	Vapor Heater 1389	14.00	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	0.34	346.96	4,164	4.08	0.238	0.50
EP-3	Vapor Heater 1390	14.00	0.24	249.00	0.23	234.61	0.18	183.45	0.10	106.54	0.37	378.67	0.30	309.10	0.27	275.77	0.01	11.85	0.00	0.00	0.01	9.16	0.01	10.89	0.16	164.63	1,934	1.90	0.264	0.26
EP-4	Vapor Heater 1391	14.00	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	0.35	353.92	4,247	4.16	0.187	0.40
EP-5	Vapor Heater 1392	14.00	0.26	265.49	0.17	178.08	0.19	190.45	0.18	178.53	0.27	270.59	0.19	190.66	0.18	180.32	0.00	4.00	0.00	0.15	0.00	3.11	0.01	13.44	0.13	135.66	1,610	1.58	0.173	0.14
EP-8	Vapor Heater 1394	29.40	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	0.12	119.84	1,438	1.41	0.054	0.04
EP-9	Vapor Heater 1395	29.40	0.18	187.90	0.20	208.83	0.25	258.46	0.13	134.67	0.24	247.51	0.35	361.11	0.27	276.49	0.24	244.56	0.12	125.84	0.13	128.98	0.16	162.16	0.21	210.53	2,547	2.50	0.062	0.08
EP-10	Vapor Heater 1396	29.40	0.47	475.73	0.25	254.28	0.23	232.88	0.18	183.87	0.19	194.27	0.19	198.56	0.16	160.86	0.15	151.66	0.13	132.12	0.13	127.73	0.09	86.79	0.20	199.67	2,398	2.35	0.054	0.06
																													<u> </u>	<b> '</b>
	Combustion Totals =		6.62	6,750.18	6.11	6,231.35	6.32	6,442.84	5.90	6,016.46	6.55	6,677.82	6.41	6,534.30	5.64	5754.43	5.90	6,016	5.69	5,801	5.85	5,965	5.70	5,810.94	5.89	6,003.32	74,004.42	72.55	NG Total:	2.62

From:	Natalie Namba
То:	TONY.KUREK@LINDE.COM
Cc:	Douglas Shearer; Air_Permits@pcs.hctx.net
Subject:	TCEQ EBT Documents - MECT Annual Report - Linde La Porte
Date:	Monday, March 17, 2025 8:28:00 AM
Attachments:	419648 MECT Annual Report Letter.pdf

Please see the attached EBT document(s) for Project Number **419626**. If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality

EBT Programs

#### ebt@tceq.texas.gov

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

From:	Natalie Namba
То:	"TONY.KUREK@LINDE.COM"
Cc:	"Douglas Shearer"; "Air_Permits@pcs.hctx.net"
Subject:	RE: TCEQ EBT Documents - MECT Annual Report - Linde La Porte
Date:	Monday, March 17, 2025 8:46:00 AM

Apologies. The Project Number referenced in my initial email is incorrect. The correct Project Number for Linde La Porte's MECT Annual Report is **419648**. I apologize for any confusion this may have caused.

From: Natalie Namba
Sent: Monday, March 17, 2025 8:29 AM
To: TONY.KUREK@LINDE.COM
Cc: Douglas Shearer <DOUGLAS.SHEARER@LINDE.COM>; Air\_Permits@pcs.hctx.net
Subject: TCEQ EBT Documents - MECT Annual Report - Linde La Porte

Please see the attached EBT document(s) for Project Number **419626 419648**. If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality

**EBT** Programs

ebt@tceq.texas.gov

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

From:	APDDIR
То:	Rebecca Partee; APDDIR
Cc:	PSSMGR; EBTTL; Natalie Namba
Subject:	RE: For Review and Approval by 3/17/2025: Basic MECT Report 419648
Date:	Friday, March 14, 2025 1:09:13 PM

Approved

Samuel Short Air Permits Division Texas Commission on Environmental Quality 512 239-5363 samuel.short@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at <u>www.tceq.texas.gov/customersurvey</u>

From: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Sent: Friday, March 14, 2025 9:37 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Natalie Namba
<Natalie.Namba@tceq.texas.gov>
Subject: FW: For Review and Approval by 3/17/2025: Basic MECT Report 419648

Sam,

Please see the attached for your approval.

Thank you, Rebecca

From: PSSMGR < <u>PSSMGR@tceq.texas.gov</u>>

Sent: Wednesday, March 12, 2025 1:34 PM

To: Rebecca Partee < rebecca.partee@tceq.texas.gov >

Cc: EBTTL < EBTTL@tceq.texas.gov>; Natalie Namba < Natalie.Namba@tceq.texas.gov>

Subject: FW: For Review and Approval by 3/17/2025: Basic MECT Report 419648

Please see the attached documents for Basic MECT Report 419648.