

06/03/2016 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 411158 STATUS: P DISP CODE: C
RECEIVED: 05/23/2016 PROJTYPE: BUSE ISSUED DT:
SUP-DISP DATE: 6/3/16

STAFF ASSIGNED TO PROJECT:

MERCADO, PE, MARIE

PROJECT NOTES:

PROJECT NOTE: AFTON CHEMICAL CORPORATION (CN604980136)_P3776 HAD BE UPDATED TO ETHYL CORPORATION (CN600127740) BECAUSE INTENT PROJECT #409553 WAS COMPLETED UNDER THE ETHYL CORPORATION.

INTENT PROJECT # 409553

USE PERIOD 03/16/2015 - 03/15/2015.

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: ETHYL CORPORATION

CUSTOMER REGISTRY ID: CN600127740

PORTFOLIO DATA

NUMBER: P1807 NAME: ETHYL CORP - LUBE AND FUEL ADDITIVES - RN101613230

SITE DATA

ACCOUNT: HG6831P

REG ENTITY ID: RN101613230

SITE NAME: AFTON LUBE AND FUEL ADDITIVES PLANT

COUNTY: HARRIS

NEAREST CITY: PASADENA

LOCATION: APPROX 1.5 MI N OF SH 225 & PRESTON ST

CONTACT DATA

NAME: MARK A VELA

TITLE: SENIOR HSES SPECIALIST

STREET: PO BOX 3008 CITY/STATE, ZIP: PASADENA, TX , 77501-3008

PHONE: 713-740-8374 ext 0

Email: mark.vela@aftonchemical.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2016-06-01 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 0.30

DOLLARS: 0

ALLOWANCE0

CERTIFICATE NO.: D3251 COUNTY : HARRIS

TRACKING ACTIVITESPROJECT SUBMITTED : 05/20/2016 PM RECEIVED DATE : 05/26/2016 PROJECT COMPLETED : 6/15/16

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

Project No.:	411158	Customer Reference No.:	CN600127740/ CN604980136
Project Type:	BUSE	Regulated Entity No.:	RN101613230
Company:	Ethyl Corporation/ Afton Chemical Corporation	Facility Name:	Ethyl Corporation – Lube and Fuel Additives Plant/ Afton - Lube and Fuel Additives Plant
City:	Pasadena	County:	Harris
Project Reviewer:	Ms. Marie Mercado, P.E.	Portfolio Number:	P1807/P3766

PROJECT OVERVIEW

Afton Chemical Corporation, previously Ethyl Corporation, submitted a Notice of Use Discrete Emission Credits application, received on May 23, 2016 and revised by the company on June 1, 2016 , for the use period of March 16, 2015 through March 15, 2016 for use of nitrogen oxides (NO_x) Discrete Emission Reduction Credits (DERC) to comply with the emission specifications for attainment demonstration (ESAD) referenced in 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A) for a gas-fired heater, Facility Identification Number X-C-1. The company reported the use of 0.3 ton (including the 10% environmental contribution of 0.1 ton) of NO_x DERCs to cover excess emissions from the heater. The use project is being completed under Afton Lube and Fuel Additives, portfolio number P1807, because the intent to use project was completed in this portfolio.

Intent to Use Project..... 409553
 Intent Amount 0.3 ton (D-3092)
 Use Amount 0.3 ton (use certificate D-3251)
 Pollutant..... NO_x
 Regulation..... §117.2010(c)(1)(A)
 Use period/Use Date..... 03/16/2015 – 03/15/2016

DISCRETE EMISSION CREDIT USE

Heater X-C-1, rated at 20 million British thermal units (MMBtu) per hour, is subject to the ESAD listed in §117.2010(c)(1)(A). The ESAD is 0.036 pounds per MMBtu (lb/MMBtu), while the actual emission rate of the heater is 0.044 lb/MMBtu. The emission rate of the heater is based on a stack test performed on August 20, 2008. The stack test summary is available on file with project number 405045 (DERC certificate D-2634). Because this emission rate is higher than the ESAD value, Ethyl used DERCs to cover the difference.

DISCRETE EMISSION CREDIT USE CALCULATION METHOD

Heater X-C-1 used 34,398 thousand standard cubic feet (Mscf) of natural gas. The average natural gas heating value was 1,020 British thermal units per standard cubic feet.

DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW

Page 2

Project Number: 411158

According to 30 TAC §101.376(e)(2)(A),

Discrete Emission Credit = $ALA \times (AER - RER)$

Where:

ALA = Actual Level of Activity

AER = Actual Emission Rate per unit activity

RER = Regulatory Emission Rate per unit activity

DECs used = $(35,086 \text{ MMBtu} \times (0.044 \text{ lb/MMBtu} - 0.036 \text{ lb/MMBtu})) \div 2,000 \text{ lb/ton}$

DECs used = 0.140 ton; Rounded up to the nearest tenth of a ton = 0.2 ton

10% environmental contribution = 0.02 ton; Rounded up to the nearest tenth of a ton = 0.1 ton

Total DERs used = 0.2 ton + 0.1 ton = 0.3 ton

CONCLUSION

Ethyl has a sufficient amount of DERs to be in compliance with §117.2010(c)(1)(A) during the use period of March 16, 2015 through March 15, 2016 at Afton Lube and Fuel Additives Plant. DERC certificate D-3092 (use certificate D-3251) has been retired.

Cruz Maria Mercado 6/15/16
Project Manager Date

Joseph Murs 6/15/16
Peer Reviewer Date



Form DEC-3 (Page 1)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

411158

I. COMPANY IDENTIFYING INFORMATION			
A. Company Name: Ethyl Corporation			
Mailing Address: P.O. Box 472			
City: Pasadena	State: TX	Zip Code: 77501-0472	
Telephone: (713) 740-8300		Fax: (713) 740-8310	
B. TCEQ Customer Number (CN): CN600127740			
C. Site Name: Ethyl Corporation - Lube and Fuel Additives Plant			
Street Address (If no street address, give driving directions to site) 1000 N. South Street			
Nearest City: Pasadena		Zip Code: 77503-2516	County: Harris
D. TCEQ Regulated Entity Number (RN): RN101613230			
E. TCEQ Air Account Number: (if applicable) HG-6831-P			P1807
F. Primary SIC: 2869		Air Permit Number: 18161	
II. TECHNICAL CONTACT IDENTIFYING INFORMATION			
A. Technical Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : Mark A. Vela			
Technical Contact Title: Sr. HSES Specialist			
Mailing Address: P.O. Box 3008			
City: Pasadena	State: TX	Zip Code: 77501-3008	
Telephone: (713) 740-8374	Fax: (713) 740-8310	E-mail: mark.vela@aftonchemical.com	
III. COMPANY CONTACT IDENTIFYING INFORMATION			
A. Company Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : H. Steven Livesay			
Company Contact Title: Sr. HSES Manager			
Mailing Address: P.O. Box 3008			
City: Pasadena	State: TX	Zip Code: 77501-3008	
Telephone: (713) 740-8371	Fax: (713) 740-8310	E-mail: steve.livesay@aftonchemical.com	
IV. Mass Emission Cap and Trade Program (MECT)			
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? ☐ Yes ☒ No			
Year DERC Generated: _____ Year of use: _____ Ratio of DERC to Allowance: _____ to _____			
<i>Note: If DERC use is to comply with MECT then go to Section X</i>			
V. Use Period			
Use Start Date: 03/16/2015		Use End Date: 03/15/2016	



E-MAILED
6/11/2016



Form DEC-3 (Page 1)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

Replaced
Page
Received
6/1/16

MAY 23 2016

Air Quality Division

I. COMPANY IDENTIFYING INFORMATION 4/1/158		
A. Company Name: Afton Chemical Corporation		
Mailing Address: P.O. Box 3008		
City: Pasadena	State: TX	Zip Code: 77501-3008
Telephone: (713) 740-8300		Fax: (713) 740-8310
B. TCEQ Customer Number (CN): CN604980136		
C. Site Name: Afton Chemical Corporation - Lube and Fuel Additives Plant per ee		
Street Address (If no street address, give driving directions to site) 1000 N. South Street 6/1/2016		
Nearest City: Pasadena	Zip Code: 77503-2516	County: Harris
D. TCEQ Regulated Entity Number (RN): RN101613230 P3766		
E. TCEQ Air Account Number: (if applicable) HG-6831-P		
F. Primary SIC: 2869	Air Permit Number: 18161	
II. TECHNICAL CONTACT IDENTIFYING INFORMATION		
A. Technical Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : Mark A. Vela		
Technical Contact Title: Sr. HSES Specialist		
Mailing Address: P.O. Box 3008		
City: Pasadena	State: TX	Zip Code: 77501-3008
Telephone: (713) 740-8374	Fax: (713) 740-8310	E-mail: mark.vela@aftonchemical.com
III. COMPANY CONTACT IDENTIFYING INFORMATION		
A. Company Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : H. Steven Livesay		
Company Contact Title: Sr. HSES Manager		
Mailing Address: P.O. Box 3008		
City: Pasadena	State: TX	Zip Code: 77501-3008
Telephone: (713) 740-8371	Fax: (713) 740-8310	E-mail: steve.livesay@aftonchemical.com
IV. Mass Emission Cap and Trade Program (MECT)		
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? ☐ Yes ☒ No		
Year DERC Generated: _____ Year of use: _____ Ratio of DERC to Allowance: _____ to _____		
Note: If DERC use is to comply with MECT then go to Section X		
V. Use Period		
Use Start Date: 03/16/2015		Use End Date: 03/15/2016



Form DEC-3 (Page 2)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

VI. State and Federal Requirements

Applicable State and Federal requirements that the DERCs will be used for compliance:

30 TAC 117.2010(c)(1)(A); 30 TAC 117.9800(a)(6); 30 TAC 117.9200(2)(D)

VII. Most Stringent Emission Rate

Describe basis for most stringent allowable emission rate:

☐ Permit : _____ ☐ RACT : _____ ☒ Other: §117.2010(c)(1)(A)

Notes:

VIII. PROTOCOL

Protocol used to calculate DERC:

Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form

Continue to Section VII (next page)



Form DEC-3 (Page 3)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

IX. Tons of DERCs Used									
Emission Point No.	FIN	Air Contaminant	Calculation of DERCs						
			Actual Emissions Rate (units)	Actual Emissions Rate (units)	Actual Total Emissions (tons)	Regulated Activity (units)	Regulated Emissions Rate (units)	Regulated Total Emissions (tons)	DERCs Used (tons)
X-C-1	X-C-1	NO _x	35,086 (MMBtu)	0.044 (lb/MMBtu)	0.772 (tons)	35,086 (MMBtu)	0.036 (lb/MMBtu)	0.632 (tons)	0.140 (tons)
								Total:	0.140 (tons)



Form DEC-3 (Page 4)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

X. TOTAL DERCS REQUIRED FOR USE (round up to the nearest tenth of a ton)

Tons of DERCS required (from Sect. VI.)	CO: _____	NO _x : <u>0.2</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : <u>0.1</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS Used	CO: _____	NO _x : <u>0.3</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

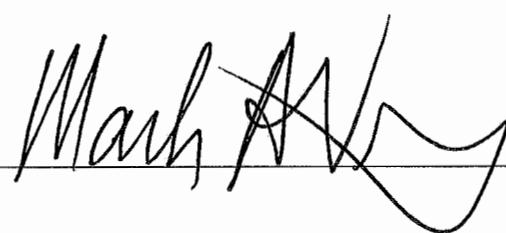
XI. DERC INFORMATION

Name of the DERC Generator: Caltex (formerly Donohoe Industries)
DERC Generator Regulated Entity Number: RN100209428
Certificate number of the DERCS acquired or to be acquired: D-2725 (original); (current certificate: D-3228)
Note: The certificate number is assigned by the TCEQ Intent Cert D-3092

XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

(project 409553)

I, Mark A. Vela, hereby certify, to the best of my knowledge and belief, that this application is correct and the use strategy claimed on this notice has met the requirements of all applicable state and federal rules and regulations. I further state that to the best of my knowledge and belief the information in this certification is not in any way in violation of 30 TAC, Subchapter H, Division 4, §101.370-101.379 or any applicable air quality rule or regulation of the Texas Commission on Environmental Quality and that intentionally or knowingly making or causing to be made false material statements or representations in this certification is a CRIMINAL OFFENSE subject to criminal penalties. I hereby also waive the Federal statute of limitations defense in regards to the generation and use of discrete emission credits.

Signature:  Date: May 20, 2016

Title: Sr. HSES Specialist

Afton Chemical Corp - Lube & Fuel Additives Plant

05/20/2016

CN604980136

RN101613230

TCEQ Account Number:

HG-6831-P

Equip ID: E-1614 Syltherm Heater

EPN: X-C-1

DERC Usage (for DEC-3 preparation)

Use period: 03/16/2015 to 03/15/2016

Basis: NG Consumption For Period

	Natural Gas Usage (MSCF)*	MMBtu**	NOx Emission Factor (lb/MMBtu)	Tons
E-1614	34,398	35,086	0.044	0.772 ✓
Target			0.036	0.632
Delta***				0.140 ✓
DERCs req'd.				0.200 ✓
Env. Contribution				0.100

(minimum)

* based on meter data

** 1020 Btu/scf

*** must be covered by NOx DERCs

05/20/2016

Afton Chemical Corp - Lube & Fuel Additives Plant

CN604980136

RN101613230

TCEQ Account Number: HG-6831-P

E-1614 Syltherm Heater

EPN: X-C-1

Use period: 03/16/2015 to 03/15/2016

Natural Gas Meter Totals

	<u>MSCF</u>
2015 Mar (16-30)	0.0
Apr	4,093.4
May	2,835.5
Jun	3,578.9
Jul	2,673.3
Aug	4,662.6
Sep	1,673.7
Oct	1,358.1
Nov	3,086.7
Dec	4,330.3

2016 Jan	1,769.9
Feb	1,892.2
Mar (1-15)	2,443.3

34,397.8

9

my ✓

~ 35,086



TCEQ Core Data Form

TCEQ Use Only

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)	☒ Other Form DEC-3 Submittal	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 604980136		RN 101613230

SECTION II: Customer Information

4. General Customer Information	5. Effective Date for Customer Information Updates (mm/dd/yyyy)		10/01/2015				
☐ New Customer ☐ Update to Customer Information ☐ Change in Regulated Entity Ownership							
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)							
The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).							
6. Customer Legal Name (If an individual, print last name first: e.g.: Doe, John)			If new Customer, enter previous Customer below:				
Afton Chemical Corporation			Ethyl Corporation				
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)				
0003069806	14309250885	430925088	05-396-9234				
11. Type of Customer:	☒ Corporation	☐ Individual	Partnership: ☐ General ☐ Limited				
Government: ☐ City ☐ County ☐ Federal ☐ State ☐ Other	☐ Sole Proprietorship	☐ Other:					
12. Number of Employees		13. Independently Owned and Operated?					
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☒ 501 and higher		☐ Yes ☒ No					
14. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check one of the following:							
☒ Owner ☐ Operator ☐ Owner & Operator							
☐ Occupational Licensee ☐ Responsible Party ☐ Voluntary Cleanup Applicant ☐ Other:							
15. Mailing Address:	P.O. Box 3008						
	City	Pasadena	State	TX	ZIP	77501	ZIP + 4
16. Country Mailing Information (if outside USA)			17. E-Mail Address (if applicable)				
			erwin.rusli@aftonchemical.com				
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)			
(713) 740-8422				(713) 740-8310			

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)	
☐ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information	
The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
Afton - Lube and Fuel Additives Plant	

23. Street Address of the Regulated Entity: (No PO Boxes)	1000 N. South Street							
	City	Pasadena	State	TX	ZIP	77503	ZIP + 4	2516
24. County	Harris							

Enter Physical Location Description if no street address is provided.

25. Description to Physical Location:										
26. Nearest City					State			Nearest ZIP Code		
27. Latitude (N) In Decimal:					28. Longitude (W) In Decimal:					
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds					
29	44	06	95	10	10					
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)					
2869	4226		325199		325998					
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)										
Fuel and lube oil additives manufacturing										
34. Mailing Address:	P.O. Box 3008									
	City	Pasadena	State	TX	ZIP	77501	ZIP + 4	3008		
35. E-Mail Address:		steve.livesay@aftonchemical.com								
36. Telephone Number			37. Extension or Code			38. Fax Number (if applicable)				
(713) 740-8371						(713) 740-8310				

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

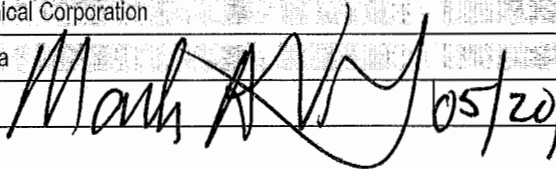
☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☒ Emissions Inventory Air	☒ Industrial Hazardous Waste
☐ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☒ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Waste Water	☐ Wastewater Agriculture	☐ Water Rights	☒ Other: EBT

SECTION IV: Preparer Information

40. Name:	Mark A. Vela		41. Title:	Sr. HSES Specialist	
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address		
(713) 740-8374		(713) 740-8310	mark.vela@aftonchemical.com		

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Afton Chemical Corporation	Job Title:	Sr. HSES Specialist	
Name (In Print):	Mark A. Vela	Phone:	(713) 740-8374	
Signature:			Date:	05/20/16



May 20, 2016

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article No. 7013 2630 0000 4589 6837

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

RE: TCEQ Form DEC-3 (Use Period: 03/16/2015 – 03/15/2016)
Afton Chemical Corporation - Lube and Fuel Additives Plant; Pasadena, Harris County
CN 604980136; RN101613230
Account Number: HG-6831-P
Portfolio: P3760

Dear EB&T Team:

Afton Chemical Corporation is submitting TCEQ Form DEC-3 (Notice of Use of Discrete Emission Credits) pursuant to 30 TAC 101.376(e)(3).

The attached Form DEC-3 represents the DERC use for the period of March 16, 2015 to March 15, 2016. The calculations used to determine the usage are also attached.

If you have any questions regarding this submittal, or need additional information, please contact me (713-740-8374; mark.vela@ethyl.com) or Dewaine Kay at (713-740-8317; dewaine.kay@ethyl.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Vela', with a stylized flourish at the end.

Mark A. Vela, P. E.
Senior HSES Specialist

Enclosures

Marie Mercado

From: Vela, Mark <Mark.Vela@AftonChemical.com>
Sent: Wednesday, June 01, 2016 9:57 AM
To: Marie Mercado
Cc: Livesay, Steve; Kay, Dewaine
Subject: RE: Request for revised application - DERC USE - Afton Lube and Fuel Additives Plant
Attachments: Ethyl-LubeAdd-TCEQ Form DEC3-2016-0601-Pg1 Rev.pdf

Ms. Mercado,

From your email, I understand that the 'DERC use' report is directly associated with the 'DERC intent' document. Therefore, since the 'intent' (03/16/2015-03/15/2016) was associated with the facility under Ethyl ownership, then the 'use' document must also reflect the Ethyl name. I have attached a revised Form DEC-3 (page 1) representing Ethyl.

I trust that submittal of this revised form via email is acceptable. Please let me know if I have misunderstood your guidance or if you need any additional information.

Sincerely,

Mark A. Vela, P.E.
Afton Chemical Corporation
mark.vela@aftonchemical.com
713-740-8374



From: Marie Mercado [mailto:Marie.Mercado@tceq.texas.gov]
Sent: Wednesday, June 01, 2016 9:09 AM
To: Vela, Mark
Cc: Livesay, Steve; Kay, Dewaine
Subject: Request for revised application - DERC USE - Afton Lube and Fuel Additives Plant
Importance: High

Good Morning Mr. Vela:

The intent project number 409553 is associated with this use project (use period: 03/16/2015 to 3/15/2016). This intent project is associated with P1807 associated with Ethyl Corporation (CN604980136). There is no intent project for the use project received on 05/23/2016. The only intent under Afton Chemical Corporation is intent project 410718 (use period 03/16/2016 to 03/15/2017). Please correct the first page of the application as appropriate (e.g., correct company name and customer number).

Thanks,

Marie Mercado, P.E.
Engineer IV

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

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 15, 2016

Mr. Mark A. Vela, P.E.
Senior HSES Specialist
Afton Chemical Corporation
PO Box 3008
Pasadena, Texas 77501-3008

Re: Use of Discrete Emission Reduction Credits
Afton Lube and Fuel Additives Plant
Pasadena, Harris County
Customer Reference Numbers: previously CN600127740 represents Ethyl Corporation;
currently CN604980136 represents Afton Chemical Corporation
Regulated Entity Reference Number: RN101613230
Portfolio Numbers: P1807; P3760

Dear Mr. Vela:

This letter is in response to a Notice of Use Discrete Emission Credits application received from Afton Chemical Corporation, previously known as Ethyl Corporation, on May 23, 2016, revised by e-mail on June 1, 2016, regarding the use of nitrogen oxides (NO_x) Discrete Emission Reduction Credits (DERC) for the purpose of compliance with 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A) for the period of March 16, 2015 through March 15, 2016.

We have reviewed your application and agree that the use of 0.3 ton of NO_x DERCs (including the 10% environmental contribution of 0.1 ton) meet the requirements of 30 TAC §101.376 for compliance with §117.2010(c)(1)(A). Certificate D-3092 has been retired for this purpose.

Thank you for your cooperation in this matter. If you have questions concerning this review or need further assistance regarding the banking program, please contact Ms. Marie Mercado, P.E., at (512) 239-2054 or write to the Texas Commission on Environmental Quality (TCEQ), Office of Air, Air Quality Division (MC-206), PO Box 13087, Austin, Texas 78711-3087.

Mr. Mark A. Vela, P.E.

Page 2

June 15, 2016

This action is taken under authority delegated by the executive director of the TCEQ.

Sincerely,

A handwritten signature in black ink that reads "David Brymer". The signature is fluid and cursive, with the first name "David" and last name "Brymer" clearly legible.

David Brymer, Director
Air Quality Division

DB/MM/jm

cc: Air Section Manager, Region 12 – Houston

Mr. Bob Allen, Director, Environmental Public Health Division, Harris County Public
Health and Environmental Services, Pasadena

Ms. Kathy Perez-Ashton, Chief Health Inspector, Health Department, City of Pasadena,
Pasadena

Mr. H. Steven Livesay, Senior HSES Manager, Afton Chemical Corporation, Pasadena

Project Number: 411158

Banking and Trading Route SlipEthyl Chemical
Corporation
Portfolio's #
P1807

AIR QUALITY DIVISION Emissions Banking and Trading Program										
Company Name: Ethyl Corporation_Afton Lube and Fuel Additives Plant_RN101613230 (P3760)										
Project Number: 411158 (Intent Project Number 409553)										
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Deric Patton, Work Lead EBTP		—								
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Author/Creator	MM 6/3/16	<table border="1"> <thead> <tr> <th>Copies Made</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>MM</td> <td>6/15</td> </tr> <tr> <th>E-Mailed</th> <th>Date</th> </tr> <tr> <td>MM</td> <td>6/15</td> </tr> </tbody> </table>	Copies Made	Date	MM	6/15	E-Mailed	Date	MM	6/15
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