04/23/1999 | NSR Permits IMS Project Record | 09:59:21

Project#: 65299 PrePerm: / / Group: CORE Permit #: M
Received: 03/31/1999 Reg6NOV: / / TechEngr: DON1 ProjType: VDRC
Fee Date: / / Date BO: / / (Don Duke)
Fee Amt.: $0 Bd-Ord#: - - NewJobs:

AIR DERC_100216035-65299_
CE_19990430_Certification_D1015

Issued To: E.I. DUPONT DE NEMOURS & COMPANY

<Primary Contact Information>

Email:
Name: Mr. Richard H. Haar Title: Senior Engineer
Building: Phone: ( ) -
Street: ~~P.O. Box 3269~~ Fax: ( ) -
City, State, Zip: Beaumont, Texas, 77704-

<Project Information>

Unit: DuPont Beaumont Works SIC: ____ Region: 10
Account: JE-0033-C Capacity: SCC: _____ County: JEFFERSON
UnitType: CapUnits: Lat: __:__:__ City: Beaumont
Location: Long: ___:__:__ CtyCo: JEFFERSON
Detail:

CORE Recd: 03/31/1999 ESOC: / / Deficient: / / RFC-SR: / /
CORE Engr: SMH1/ARL1 ASOC: / / Tech.Comp: / / RFC-DSC: / /
AdminComp: / / ESOO: / / Comp.Ltr.: / / Renewal:NO FIND
TransEngr: / / ASOO: / /

PN Required: ???
Date PN: / /
Date Pub: / /
PN/Sign/Cert: / /

<Public Meeting - Hearing>

	Meeting	Hearing
Requested:	/ /	/ /
Disposed:	/ /	/ /
Disp Code:		

<TONs/Yr Reduction>

NOX:	0.0
CO:	0.0
VOC:	0.0
PM:	0.0
SO2:	0.0

Status:

<Project Activity History>

No	Date	Code	Date	Code	TelCons	Mis Date	Mis Code
1	/ /		/ /		/ /	/ /	
2	/ /		/ /		/ /	/ /	
3	/ /		/ /		/ /	/ /	
4	/ /		/ /		/ /	/ /	
5	/ /		/ /		/ /	/ /	
6	/ /		/ /		/ /	/ /	
7	/ /		/ /		/ /	/ /	
8	/ /		/ /		/ /	/ /	
9	/ /		/ /		/ /	/ /	
10	/ /		/ /		/ /	/ /	

<Codes: E=Engineer, C=Company, O=Other, ?=Partial, *=Complete>

NSPS Code:	N.A. County: YES	Non-PSD-Major: ???	<Local Programs>
NESHAP Code:	N.A.Net.Req: ???	PSD Net. Req: ???	County: U
MACT Code: ???	N.A.Rev.Req: ???	PSD Rev. Req: ???	City: ???

<Project Disposal>

Chief Sign: 4/30/99 BH
Date Issued: / / Code: C

Processing Days as of 04/23/1999

Eng: 23 Comp: 0 Other: 0

Warn: NONE

04/23/1999 — NSR Permits IMS Project Record — 09:59:21

Project#: 65299 PrePerm: / / Group: CORE Permit #: M
Received: 03/31/1999 Reg6NOV: / / TechEngr: DON1 ProjType: VDRC
Fee Date: / / Date BO: / / (Don Duke) STDX1:
Fee Amt.: $0 Bd-Ord#: - - NewJobs: 0 182(f): NO
PSD-TX #: <NONE>
Issued To: E.I. DUPONT DE NEMOURS & COMPANY ProjLink: <NONE>

<Primary Contact Information>
Email:
Name: Mr. Richard H. Haar Title: Senior Engineer
Building: Phone: ( ) -
Street: ~~P.O. Box 3269~~ Fax: ( ) -
City, State, Zip: Beaumont, Texas, 77704-

<Project Information>
Unit: DuPont Beaumont Works SIC: ____ Region: 10
Account: JE-0033-C Capacity: SCC: _____ County: JEFFERSON
UnitType: CapUnits: Lat: __:__:__ City: Beaumont
Location: Long: ___:__:__ CtyCo: JEFFERSON
Detail:

CORE Recd: 03/31/1999 ESOC: / / Deficient: / / RFC-SR: / /
CORE Engr: SMH1/ARL1 ASOC: / / Tech.Comp: / / RFC-DSC: / /
AdminComp: / / ESOO: / / Comp.Ltr.: / / Renewal:NO FIND
TransEngr: / / ASOO: / /

PN Required: ???
Date PN: / /
Date Pub: / /
PN/Sign/Cert: / /

<Public Meeting - Hearing>

Requested:	/ /	/ /
Disposed:	/ /	/ /
Disp Code:		

<TONs/Yr Reduction>

NOX:	0.0
CO:	0.0
VOC:	0.0
PM:	0.0
SO2:	0.0

Status:

<Project Activity History>

No	Date	Code	Date	Code	TelCons	Mis Date	Mis Code
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2	/ /		/ /		/ /	/ /	
3	/ /		/ /		/ /	/ /	
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5	/ /		/ /		/ /	/ /	
6	/ /		/ /		/ /	/ /	
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9	/ /		/ /		/ /	/ /	
10	/ /		/ /		/ /	/ /	

<Codes: E=Engineer, C=Company, O=Other, ?=Partial, *=Complete>

NSPS Code:	N.A. County: YES	Non-PSD-Major: ???	<Local Programs>
NESHAP Code:	N.A.Net.Req: ???	PSD Net. Req: ???	County: U
MACT Code: ???	N.A.Rev.Req: ???	PSD Rev. Req: ???	City: ???

<Project Disposal>
Chief Sign: / / _____
Date Issued: / / Code:

Processing Days as of 04/23/1999
Eng: 23 Comp: 0 Other: 0

Warn: NONE

..\ZIMS\RPTS\MIKIED1.FRX Mark Bennett, 239-1029 15SEP1998 Page: 1

Project#: 65299 Group: CORE Permit #: M STDX1/SP:
Received: 03/31/1999 TechEngr: DON1 ProjType: VDRC PSD-TX #: <NONE>
IssuedTo: E.I. DUPONT DE NEMOURS & COMPANY ProjLink: <NONE>
Unit: DuPont Beaumont Works Account: JE-0033-C

Emission Rates: No Emission Rates found for this project.

<No Valid Relations Exist>.

REC#	ENGR	PERMIT#	TYPE	COMPANY	UNIT	RECEIVED	DISPOSED	CODE	ER
						/ /	/ /		

BOR-100

DUPONT

ESTABLISHED 1802

E. I. DU PONT DE NEMOURS & COMPANY

INCORPORATED

BEAUMONT WORKS

P. O. BOX 3269, BEAUMONT, TEXAS 77704

RAIL ADDRESS, DOWLING, TEXAS

409 / 722-3451

March 30, 1999

Ms. Susana Hildebrand
Core Section, New Source Review Permits
Office of Air Quality
Texas Natural Resource Conservation Commission
P.O. Box 13087, MC-162
Austin, TX 78711-3087

18296d

DuPont Beaumont Works
Beaumont, Jefferson County, TX
Account I.D. No. JE-0033-C

Re: Application for 1998 Discrete Emission Reduction Credits (DERC's)

Dear Ms. Hildebrand:

In response to 30 TAC 101.29, DuPont Beaumont Works is submitting documentation for Discrete Emission Reduction Credits (DERC's) generated in calendar year 1998.

Enclosed is documentation requesting **332** tons of NOx DERC's and **183.27** tons of creditable NOx emissions. We would want the NOx reductions beyond NOx RACT to result in creditable NOx emissions to be used in netting.

We have been accumulating NOx ERC's and DERC's since we made NOx reductions in our Ammonia Reformer (AMM-STK26) in October, 1994, in anticipation of upcoming NOx RACT requirements. Our initial submittal for NOx DERC's from October, 1994 through December 1997, was submitted in June 1998. This submittal is to claim the continuing generation of NOx DERC's in 1998.

If you have any questions, please call me at (409) 727-9128, or Dennis Isaacs at (409) 727-9528.

Sincerely,

Richard H Haar

Richard H. Haar
Senior Engineer

RHH/rh
Attachment

Table of Contents

INTRODUCTION

Creation of Discrete Emission Reduction Credits for the DuPont Beaumont Works, Beaumont, TX

DuPont Beaumont Works, Beaumont, TX requests to be credited with Discrete Emission Reduction Credits (DERCs) which were created when a nitrogen rich stream from the Ammonia Reformer (EPN: AMM-STK26) was diverted to a flare (EPN: AMM-CBF266).

In October, 1994 Du Pont diverted a nitrogen rich stream from the Ammonia Reformer (EPN: AMM-STK26) to a flare (FIN: AMM-CBF266), resulting in a reduction of NOx emissions from the Ammonia Reformer. To quantify the reduction in NOx emissions, stack tests were conducted at the reformer, before and after the change (diversion of stream). These tests indicated that the NOx emissions from the Ammonia Reformer before the change were 0.27 lb/MMBTU and after the change were 0.10 lbs/MMBTU. Thus the baseline emission rate for the ammonia reformer is 0.27 lbs/MMBTU and the actual emission rate for the reformer would be 0.10 lbs/MMBTU

Title 30 of Texas Administrative Code, §117.205 sets the limit for NOx emissions from a high heat release process heater operating within a temperature range of 1800 -2150°F at 0.15 lbs/MMBTU. This limit will come into effect in 1999. DuPont would like to use 0.147 lbs NOx /MMBTU as a conservative strategic emission rate. As the test in 1994 demonstrated, this rate is much greater than the actual emission rate (0.10 lbs/MMBTU). DuPont would also like to retain the emissions credits created due to the difference in the strategic emission rate used for the calculation of DERCs (0.147 lbs/MMBTU) and the actual emission rate (0.10 lbs/MMBTU) as a Creditable Emission Reduction that can be used at a later date.

The nitrogen rich stream diverted from the reformer goes to the Refrigeration Flare (EPN: AMM-CBF266). The manufacturer of this flare (John Zinc) specifies that the flare produces 0.12 lbs of NOx/ 100 lbs of NH_3 burned. The NOx emissions from the flare due to the stream are documented in the emission inventory of 1998. Emissions from this flare due to the diverted stream have been taken into account as DERCs cannot be created using reductions that would otherwise counter an increase at the same site.

After taking the emissions from the flare into account, Discrete Emission Reduction Credits have been calculated yearly as the difference in emissions due to a change in emission rate from the baseline emission rate to the strategic emission rate for the period January, 1998, through December, 1998.

The application along with necessary documentation and calculations is enclosed. If you need additional information please call me at 409-727-9128.

APPLICATION FORMS

TNRCC

Form D-1 (Page 1)
Notice of Generation
of Discrete Emission Reduction Credits
(Title 30 Texas Administrative Code § 101.29)

A notice of generation nd generator certification must be sumitted to the Texas Natural Resource Conservation Commission (TNRCC) DERC Registry in accordance with the following requirements if the reduction is to be creditable and marketable:

I. COMPANY IDENTIFYING INFORMATION		
A. Company Name: E. I. duPont de Nemours & Company		
B. Owner or Operator of Generator Source: E. I. duPont de Nemours & Company		
C. Plant/Site Name: DuPont Beaumont Works		
D. Street Address: State Highway 347		
E. Nearest City: Beaumont	F. Zip Code: 77704	
G. County: Jefferson	H. Primary SIC: 2869	
I. TNRCC Account No.: JE-0033-C		
J. Telephone: 409-727-9128	K. Fax: 409-727-9412	
L. Mailing Address: P.O. Box 3269		
City: Beaumont	State: Texas	Zip Code: 77704

II. TECHNICAL CONTACT IDENTIFYING INFORMATION		
A. Technical Contact Name: (_X_Mr. __Mrs. __Ms. __Dr.) Richard H. Haar		
B. Technical Contact Title: Senior Engineer		
C. Telephone: 409-727-9128	D. Fax: 409-727-9412	
E. Mailing Address: P. O. Box 3269		
F. City: Beaumont	State: Texas	Zip Code: 77704

III. CONTACT FOR SALE OF CERTIFICATE		
A. Contact Name: (_X_Mr. __Mrs. __Ms. __Dr.) W. Dennis Isaacs		
B. Sale Contact Title: Senior Specialist		
C. Telephone: 409-727-9528	D. Fax: 409=727-9412	
E. Mailing Address: P. O. Box 3269		
F. City: Beaumont	State:Texas	Zip Code: 77704

IV. Generation Period

__X__ 12 months
____ Other _____ Days/months

V. Generation Activity

☐ **Shutdown** ☐ **Additional Control X Other: Diversion of nitrogen containing stream from the ammonia reformer (AMM-STK26) to the refrigeration flare (AMM-CBF266).**

TNRCC

Form D-1 (Page 2)
Notice of Generation
of Discrete Emission Reduction Credits
(Title 30 Texas Administrative Code § 101.29)

VI. EMISSIONS RATE DATA

Attach documentation which demonstrates the basis for each value represented in the following table.

If SA ≥ BA, then: (BER*BA) - (SER*SA) = reduction

If SA < BA, then: (BER*BA) - (SER*BA) = reduction

Emission Point No.	FIN	Air Contaminant	Calculation of DERCs					
			Baseline Activity (units)	Baseline Emission Rate (units)	Strategy Activity (units)	Strategy Emission Rate (units)	Most stringent emission rate (units)	DERCs (T)
AMM-STK26	AMM/STK26	NOx	6,704,384	0.27	7,798,933	0.147	0.15	332
			MMBTU	Lb/MMBTU	MMBTU	lb/MMBTU	lb/MMBTU	

VII. Shutdown Emission Reduction Strategies

Has production shited from the shutdown facility to another facility in the same nonattainment area? ☐ Yes* X No
*If Yes, DERC can not be claimed.

VIII. VOC

List Specific Compounds reduced:

Emission Point No	FIN	Name of Air Contaminant	DERCs (T)

TNRCC

Form D-1 (Page 3)
Notice of Generation
of Discrete Emission Reduction Credits
(Title 30 Texas Administrative Code § 101.29)

VIII. Most Strigent Emission Rate

Describe basis for most stringent emission rate: ☐ Permit_____ X RACT_____ ☐Other:

Title 30 Texas Administrative Code Chapter 117.205 (Effective 1999)

IX. Protocol

Protocol used to calculate DERC: Calculated based on Emission Banking and Trading rules as cited in 30 TAC 101.29 and the June 5, 1998 Guidance Document. Emission rates are based on stack tests conducted in 1993 and 1994 under actual operating conditions.

VIII. CERTIFICATION BY RESPONSIBLE OFFICIAL

All representations in this registration of emissions, with regard to emissions, shall become conditions upon which the stationary source shall operate. It shall be unlawful for any person to vary from such representation unless the registration is first revised. This registration of emissions shall include documentation of the basis of emission rates and the certification below, in accordance with Title 30 Texas Administrative Code § 122.165 (relating to Certification of a Responsible Official), that the maximum emission rates listed on the registration reflect the reasonably anticipated maximums for operation of the stationary source.

I, Roy E. Wells ,hereby certify that the emission reductions claimed on this notice arereal, surplus, and
(Name printed or typed)

not based on an emission reduction strategy prohibited in 10 TAC §101.29 to the best of my knowledge and belief and that the information entered in this application is correct to the best of my knowledge and belief.

Signature: Roy E. Wells Signature Date: March 30, 1999

Title: Industrial Park Manager

CALCULATIONS

Monthly Heat Input to the Ammonia Reformer (AMM-STK26)

Month	'1992		'1993		'1994	
	Average hours	Ave. Usage MMBTU/hr	Average hours	Ave. Usage MMBTU/hr	Average hours	Ave. Usage MMBTU/hr
January			342.90	686.41	731.42	878.06
February			333.44	1,412.43	145.01	1,456.03
March			787.67	836.97	744.00	871.10
April			527.35	892.34	696.00	893.46
May			672.00	810.44	758.80	931.78
June			768.00	803.96	720.00	914.91
July			712.10	841.17	693.92	898.19
August			764.03	819.79	792.00	932.03
September			549.58	923.45	720.00	933.85
October	720	787.44	696.00	828.61		
November	744	761.37	756.41	843.49		
December	744	734.97	720.00	838.78		
Total Hours (hrs)	2,208.00		7,629.48		6,001.15	
Total Usage (MMBTU)		1,680,233.76		6,549,728.66		5,522,901.34
Average Usage (MMBTU/hr)		760.98		858.48		920.31

(Monthly Data After)

Monthly Heat Input to the Ammonia Reformer (AMM-STK26)

Month	'1998	
	Average hours	Ave. Usage MMBTU/hr
January	720.00	883.90
February	580.00	948.50
March	739.67	906.10
April	720.00	894.00
May	636.00	944.60
June	768.00	904.00
July	744.00	887.50
August	672.00	903.40
Septembe	774.17	944.50
October	720	937.7
November	624	901.5
December	864	887.9
Total Hour	**8,561.85**	
Total Usage (MMBTU		**7,798,933.30**
Average Usage (MMB		**910.89**

Annual Emissions Caused at the Flare by the diverted stream

1998 **0.60** tons

EPN: AMM-STK26
High heat release Process Heater
Maximum Heat Capacity = > 100 MMBTU/hr
Operational firebox temperature= 1870-2100 °F
Emission Specification according to §117.205(b)(2)(B)(iii) 0.15 lb NOx/MMBTU

Hourly Heat Input

Heat input to the Ammonia Reformer during the period Oct -Dec 92 (BER)	760.98 MMBTU/hr
Heat input to the Ammonia Reformer in the year 1993 (BER)	858.48 MMBTU/hr
Heat input to the Ammonia Reformer during the period Jan-Sept 94 (BER)	920.31 MMBTU/hr
Average Hourly Heat Input	846.59 MMBTU/hr

Number of Hours the Reformer was in Use

For the Period Oct - Dec 92	2,208.00 hours
For the Year 1993	7,629.48 hours
For the Period Jan - Dec 94	6,001.15 hours
Number of hours in an annualized two-year timeframe	7,919.32 hours
Baseline Activity (BA) =	**6,704,384 MMBTU**
Average rate of emissions of NOx before the change (ref. 1993 Stack test report) (	**0.27 lbs/MMBTU**
Average annualized NOx emissions over a two year frame	**905.09 tons**

905

(SA)

EPN: AMM-STK26
High heat release Process Heater
Maximum Heat Capacity = > 100 MMBTU/hr
Operational firebox temperature= 1870-2100 oF
Emission Specification according to §117.205(b)(2)(B)(iii) 0.15 lb NOx/MMBTU

Hourly Heat Input

Heat input to the Ammonia Reformer in the year 1998 (SER) 910.89 MMBTU/hr

Number of Hours the Reformer was in Use

For the Year 1998 8,561.85

Strategic Activity (SA)

for the year 1998 7,798,933 MMBTU

DERC's

EPN: AMM-STK26
High heat release Process Heater
Maximum Heat Capacity = > 100 MMBTU/hr
Operational firebox temperature= 1870-2100 oF
For process heaters with firebox temperature > or = 1800oF, 0.15 lbs/MMBTU
(According to §117.205)

The 1994 tests indicate that the average rate of emissions from the reformer after the change are well below the limit set by the NOx RACT.
Hence we could claim DERCs as the difference between baseline activity (0.27 lb/MMBTU) and the current strategically reduced activity (0.10 lb/MM BTU)
However to be on the conservative side, we will calculate DERCs obtained as the difference between the emissions before the change
and a level slightly below the maximum emissions allowable according to §117.205.
Thus the Strategic Activity (SA) for the reformer that will be used to calculate DERCs will be 0.147 lb/MMBTU
The difference between the current emission rate (0.10 lbs/MMBTU) and the strategic emission rate used to calculate DERCs (0.147 lbs/MMBTU)
will be retained by DuPont as Creditable Emissions that can be used later.

Average emissions prior to the change are (BER)(BA) = 905.09 tons/yr

Using the Strategic Activity (SA) = 0.147 lbs/MMBTU

Strategic Emissions for the year 1998 = (SER)(SA) = **573** tons

DERCs for each of these time periods will be (BER)(BA)-[(SER)(SA)+Emissions caused by the diverted streamat the flare]

		Rounding down
Year of 1998	332.09 tons	**332** tons

Credit Emissions

EPN: AMM-STK26
High heat release Process Heater
Maximum Heat Capacity = >100 MMBTU/hr
Operational firebox temperature= 1870-2100 °F
For process heaters with firebox temperature > or = 1800°F, 0.15 lbs/MMBTU

The difference between the current emission rate (0.10 lbs/MMBTU) and the strategic emission rate used to calculate DERCs (0.147 lbs/MMBTU) will be retained by DuPont as Creditable Emissions that can be used later and is calculated as follows

Strategic Activity Rate =	0.147	lbs/MMBTU
Actual Emission Rate (Ref 1994 Stack Test Report)	0.1	lbs/MMBTU
Creditable Emissions for the year 1998 =	**183.27**	tons

SUMMARY RESULTS OF 1993 AND 1994 STACK TESTS

METCO ENVIRONMENTAL
P.O. Box 598
Addison, TX 75001
(214) 931-7127

SOURCE EMISSIONS SURVEY OF E.I. DU PONT DE NEMOURS & COMPANY, INC. AMMONIA REFORMER EXHAUST DUCT AND EAST AND WEST AUXILIARY BOILERS EXHAUST DUCTS BEAUMONT, TEXAS

NOVEMBER 1993

FILE NUMBER 93-308A

SUMMARY OF RESULTS

Ammonia Reformer Exhaust Duct

Condition	Run Number	Oxides of Nitrogen Emissions (ppm)	Oxides of Nitrogen Emissions (ppm*)	Oxides of Nitrogen Emissions (lbs/million Btu**)	Carbon Monoxide Emissions (ppm)	Carbon Monoxide Emissions (ppm*)	Carbon Monoxide Emissions (lbs/million Btu**)	Oxygen Concentration (%)
I	1	227	214	0.260	< 0.5	< 0.5	< 0.001	1.9
	2	237	228	0.277	< 0.5	< 0.5	< 0.001	2.3
	3	232	224	0.273	< 0.5	< 0.5	< 0.001	2.4
	Average	232	222	0.270	< 0.5	< 0.5	< 0.001	2.2
II	4	99	93	0.113	< 0.5	< 0.5	< 0.001	1.8
III	5	97	90	0.109	1.5	1.4	0.001	1.6

* Corrected to 3 percent Oxygen.

** Calculated using an F_d factor of 8,710 dscf/million Btu.

METCO ENVIRONMENTAL
P.O. Box 598
Addison, TX 75001
(214) 931-7127

SOURCE EMISSIONS SURVEY OF E.I. DU PONT DE NEMOURS & COMPANY, INC. AMMONIA REFORMER EXHAUST DUCT (EPN AMM-STK26) BEAUMONT, TEXAS

DECEMBER 1994

FILE NUMBER 94-292

SUMMARY OF RESULTS

Ammonia Reformer Exhaust Duct (EPN AMM-STK26)

Condition	Run Number	Oxides of Nitrogen Emissions (ppm)	Oxides of Nitrogen Emissions (lbs/hr)	Carbon Monoxide Emissions (ppm)	Carbon Monoxide Emissions (lbs/hr)
I	1	80.5	108.24	< 0.5	< 0.41

Ammonia Reformer Exaust Duct (EPN: AMM-STK26)

Result of Test Conducted in December 1994

Oxides of Nitrogen Emissions 80.5 ppm
108.24 lbs/hr

lbs/MMBTU = (ppm*CF*F_d factor*20.9 % O_2)/(20.9% O_2-%O_2 measured)

CF = Conversion factor for ppm to lbs/dscf = 1.19E-07

F_d = Oxygen based F factor = 8,710 dscf/MMBTU

So 80.5 ppm is = 0.10 lbs/MMBTU

tRL COPY / SMH

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

June 14, 1999

Mr. Rich Haar
Senior Engineer
E. I. Dupont De Nemours
& Company
P.O. Box 3269
Beaumont, Texas 77704

Re: Administrative Review
Discrete Emission Reduction Credits
Dupont Beaumont Works
Beaumont, Jefferson County
Account ID No. JE-0033-C

Dear Mr. Haar:

This is in response to your conversations with Ms. Susana Hildebrand and your FAX to her dated June 1, 1999. At your request we have reevaluated your registration request dated March 30, 1998 and have revised your DERC credits. The revised credits will be deposited in the Texas Natural Resource Conservation Commission Emissions Registry:

Nitrogen Oxides 1,105 tons

This review verifies that all information needed for credit review has been received. However, the DERCs' actual credit has not yet been verified. Upon submittal of a notice of intent to use, the credits will be assigned to a technical engineer who will review the reductions for creditability. At that time, the credits may be adjusted accordingly.

Thank you for your cooperation in this matter. We regret any inconvenience our error in interpreting your request might have caused. If you have questions concerning the review or this notice, please contact me at (512) 239-1314 or write to me at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 7811-3087.

Re: Discrete Emission Reduction Credits

If you need further assistance regarding the banking program or future transactions, please call Ms. Susana Hildebrand at (512) 239-1255 or write to her at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald A. Duke

Donald A. Duke, P.E.
Permit Engineer
Core Section
New Source Review Permits Division

DD/pl

cc: Mr. Marion Everhart, Air Program Manager, Beaumont

09/13/1999 | NSR Permits IMS Project Record | 15:13:45

Project#: 65908 PrePerm: / / Group: CORE Permit #: M
Received: 09/22/1998 Reg6NOV: / / TechEngr: DON1 ProjType: VDRC
Fee Date: / / Date BO: / / (Don Duke) STDX1:
Fee Amt.: $0 Bd-Ord#: - - NewJobs: 0 182(f): NO
PSD-TX #: <NONE>
Issued To: E.I. DUPONT DE NEMOURS & COMPANY ProjLink: 59892

<Primary Contact Information>
Email:
Name: Mr. Rich Haar Title: Senior Engineer
Building: Phone: ( ) -
Street: P.O. Box 3269 Fax: ( ) -
City, State, Zip: Beaumont, Texas, 77704-

<Project Information>
Unit: DUPONT BEAUMONT WORKS SIC: ____ Region: 10
Account: JE-0033-C Capacity: SCC: _____ County: JEFFERSON
UnitType: CapUnits: Lat: __:__:__ City: BEAUMONT
Location: SH 347 Long: ___:__:__ CtyCo: JEFFERSON
Detail:

CORE Recd: 09/22/1998 ESOC: / / Deficient: / / RFC-SR: / /
CORE Engr: DON1/ ASOC: / / Tech.Comp: / / RFC-DSC: / /
AdminComp: / / ESOO: / / Comp.Ltr.: / / ED Post: / /
TransEngr: / / ASOO: / /

<Public>—Requested—Disposed—Code
Meeting: / / / /
Hearing: / / / /

<Public Notice Required: ???>
Date Notified: / /
Date Published: / /
Date PN/Sign/Cert: / /

<TONs/Yr Reduction>	<NOX>	<CO>	<VOC>	<PM>	<SO2>
NSRP Reductions	0.0	0.0	0.0	0.0	0.0
VERP 766(A), 7(B):	0.0	0.0	0.0	0.0	0.0

Status: TRANSFERRED TO DON 5/7/99.

<Project Activity History>

No	Date	Code	Date	Code	TelCons	Mis Date	Mis Code
1	/ /		/ /		/ /	/ /	
2	/ /		/ /		/ /	/ /	
3	/ /		/ /		/ /	/ /	
4	/ /		/ /		/ /	/ /	
5	/ /		/ /		/ /	/ /	
6	/ /		/ /		/ /	/ /	
7	/ /		/ /		/ /	/ /	
8	/ /		/ /		/ /	/ /	
9	/ /		/ /		/ /	/ /	
10	/ /		/ /		/ /	/ /	

<Codes: E=Engineer, C=Company, O=Other, ?=Partial, *=Complete>

NSPS Code:	N.A. County: YES	Non-PSD-Major: ???	<Local Programs>
NESHAP Code:	N.A.Net.Req: ???	PSD Net. Req: ???	County: U
MACT Code: ???	N.A.Rev.Req: ???	PSD Rev. Req: ???	City: ???

<Project Disposal>
Chief Sign: 05/13/1999 _____
Date Issued: / / Code: C

Processing Days as of 09/13/1999
Eng: 233 Comp: 0 Other: 0
Warn: NONE

..\ZIMS\RPTS\MIKIED1.FRX Mark Bennett, 239-1029 15JUN1999 Page: 1

09/13/1999 | NSR Permits IMS Related Projects | 15:13:46

Project#: 65908 Group: CORE Permit #: M STDX1/SP:
Received: 09/22/1998 TechEngr: DON1 ProjType: VDRC PSD-TX #: <NONE>
IssuedTo: E.I. DUPONT DE NEMOURS & COMPANY ProjLink: 59892
Unit: DUPONT BEAUMONT WORKS Account: JE-0033-C

Emission Rates: No Emission Rates found for this project.

Projects below are related by one or more of: [Link]

REC#	ENGR	PERMIT#	TYPE	COMPANY	UNIT	RECEIVED	DISPOSED	CODE
59892	RRC1	M	DERC	E.I. DUPONT	DUPONT	06/23/1998	08/27/1998	C

ERC COPY /SMH

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 13, 1999

Mr. Rich Haar
Senior Engineer
E. I. Dupont De Nemours & Company
P.O. Box 3269
Beaumont, Texas 77704

Re: Administrative Review
Discrete Emission Reduction Credits
Dupont Beaumont Works
Beaumont, Jefferson County
Account ID No. JE-0033-C

Dear Mr. Haar:

This will acknowledge receipt of your letter dated June 26, 1998, and additional information received September 22,1998, regarding the generation of Discrete Emission Reduction Credits (DERCs). We have determined that the information contained in your registration is complete. We regret the long delay in addressing this matter. The following credits will be deposited in the Texas Natural Resource Conservation Commission Emissions Registry:

Nitrogen Oxides 1540 tons

This review verifies that all information needed for credit review has been received. However, the DERCs' actual credit has not yet been verified. Upon submittal of a notice of intent to use, the credits will be assigned to a technical engineer who will review the reductions for creditability. At that time, the credits may be adjusted accordingly.

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-1314 or write me at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division MC-162), P.O. Box 13087, Austin, Texas 7811-3087.

Re: Discrete Emission Reduction Credits

If you need further assistance regarding the banking program or future transactions, please call Ms. Susana Hildebrand at (512) 239-1255 or write her at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald A. Duke

Donald A. Duke, P.E.
Permit Engineer
Core Section
New Source Review Permits Division

DD/jo

cc: Mr. Marion Everhart, Air Program Manager, Beaumont

June 1, 1999

Don,
I talked to Richard Haar of duPont and duPont had only wanted to claim the credits for the difference between 0.23 lb/mmbtu and 0.147 lb/mmbtu instead of the 0.10 lbs/mmbtu that they achieved. The difference between 0.147 and 0.10 is going to be sought as an ERC. Could you send them a letter correcting the amount of DERC registered based on the information in this fax?

Thank you,
Susana

cc: Matt

Beaumont Works
P. O. Box 3269 - Beaumont, TX 77704
Delivery Address: Hwy. 347 South -Beaumont, TX 77705
Fax: 409 / 727-9412
Fax Operator: 409 / 727-9479

E. I. du Pont de Nemours & Co., Inc,

Fax

To: Susana Hildebrand **From:** Rich Haar

Fax: 512-239-4500 **Date:** 6/1/99

Phone: **Pages:** 2 (including cover sheet)

Re: Revised DERC's **CC:**

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

Comments: I've revised the DERC spread sheet to reflect over control down to the upcoming NOx RACT level for process heaters of 0.15 lb/NOx / MM BTU. Over control to 0.10 level will be applied to ERC's. The grand total of DERC's according to this revised calc is 1107 tons NOx

Thanks RH Haar

DERC CALCULATIONS - DUPONT BEAUMONT WORKS

PERIOD	BA	BER	B%	SA	SER	S%	DERC	
1994	6,704,384	~~1676096~~	0.27	1	1938153	0.147	1	83.8	83
1995	6704 384	~~7764530~~	0.23	1	7764530	0.147	1	322.2	322
1996	6704 384	~~7702603~~	0.239	0.9604	7702603	0.147	0.9137	366.7	366
1997	6704 384	~~7030109~~	0.239	0.9604	7030109	0.147	0.9137	334.7	334
							TOTAL	1107.4 TONS	1105

NOTE: THESE REVISED CALCULATIONS ARE BASED ON MEETING THE NOX RACT LIMIT FOR PROCESS HTRS OF 0.15 LBS NOX/MM BTU. OVER CONTROL BEYOND NOX RACT WILL BE APPLIED TO ERC'S

905

905

FILE/DON

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

April 30, 1999

Mr. Richard H. Haar
Senior Engineer
E.I. Dupont de Nemours and Company
P.O. Box 3269
Beaumont, Texas 77704

Re: Administrative Review
Discrete Emission Reduction Credits (DERCs)
DuPont Beaumont Works
Beaumont, Jefferson County
Account ID No. JE-0033-C

Dear Mr. Haar:

This will acknowledge receipt of your letter dated March 30, 1998, regarding the generation of DERCs. We have determined that the information contained in your registration is complete. The following credits will be deposited in the Texas Natural Resource Conservation Commission Emissions Registry:

Nitrogen Oxides 332 tons 20398 — 20729

This review verifies that all information needed for credit review has been received. However, the DERCs' actual credit has not yet been verified. Upon submittal of a notice of intent to use, the credits will be assigned to a technical engineer who will review the reductions for creditability. At that time, the credits may be adjusted accordingly.

Re: Emission Reduction Credits

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-1314 or write me at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087. If you need further assistance regarding the banking program or future transactions, please call Ms. Susana Hildebrand at (512) 239-1255 or write her at Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Susana Hildebrand for

Donald A. Duke, P.E.
Permit Engineer
Core Section
New Source Review Permits Division

DD/gg

Enclosures

cc: Mr. Marion Everhart, Air Program Manager, Beaumont