Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*

AIR DERC_102212925-66832_
CE_19990721_Certification_D1069

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 21, 1999

Ms. Cynthia L. Gleason
Staff Environmental Coordinator
Exxon Chemical Company
3525 Decker Drive
Baytown, Texas 77520-0100

Re: Administrative Review
Discrete Emission Reduction Credits
Baytown, Harris County
Account ID No. HG-0228-H

Dear Ms. Gleason:

This will acknowledge receipt of your letter dated June 15, 1998 regarding the generation of Discrete Emission Reduction Credits (DERCs). We have determined that the information contained in your registration is complete. The following credits will be deposited in the TNRCC Emissions Registry:

Nitrogen Oxides - 303 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 to me at Texas Natural Resource Conservation Commission, Office of Permitting, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 7811-3087.

Re: 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 Permitting, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald A. Duke

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

DD/pl

cc: Ms. Orbie Ratcliff, Air Section Manager, Houston
Mr. Rob Barrett, Director, Harris County Pollution Control Department, Pasadena

Record No. 66832

EXXON CHEMICAL COMPANY

C.

I.D.6, R.	99 BOPEC
7-9-99	129

EXXON CHEMICAL

Baytown Olefins Plant
D. G. Blake
PLANT MANAGER

July 9, 1999

DISCRETE EMISSION REDUCTION CREDIT
INFORMATION REQUEST REPSONSE
TNRCC ACCOUNT NO. HG-0228-H

Mr. Don Duke
Emission Credit Trading Group
Texas Natural Resource Conservation Commission
New Source Review Permits Division (MC-162)
P. O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Duke:

This letter is in response to our July 6, 1999 telephone conversation regarding the calculations used to quantify the Discrete Emission Reduction Credits (DERC) documented in our December 30, 1998 letter to Ms. Susana Hildebrand. The December, 1998 letter addressed the DERC registration submitted on June 12, 1998. The DERCs were obtained by the early installation of additional steam injection facilities on the gas turbines.

I have reviewed the calculations included in that letter and have included the corrected calculations below as well as the relevant text from the December, 1998 letter. Please use this letter as the basis for the DERC.

The baseline emissions of the gas turbines were represented in the 1994 and 1995 TNRCC Emission Inventories. The emission inventories were submitted electronically using the Computerized Emission Inventory System (CEIS). A printout of the 1994 and 1995 emission information for the three cogeneration units (gas turbines and heat recovery steam generators) are attached. A summary of the NOx emissions is shown in the table below.

FIN/EPN	Gas Turbine (Tons/Yr)		HRSG (Tons/Yr)		Stack Total (Tons/Yr)	
	1994	1995	1994	1995	1994	1995
CG-160/E-160	275	249	7	6	282	255
CG-161/E-161	250	252	6	6	256	258
CG-162/E-162	260	254	5	6	265	260

3525 Decker Drive, Baytown, Texas 77520-0100
Tel: (281) 834-6161 Fax: (281) 834-6444
A Division of Exxon Corporation

RECYCLED

The baseline activity rate for the three gas turbines is based on measured fuel flow rates to the gas turbines. This fuel flow rate is averaged over the two-year period preceding the reduction. The baseline emission rate is based on compliance tests of the gas turbines in 1989-1990. This testing showed that the gas turbines exhaust gas concentrations were 42 ppmv (dry, 15% oxygen). The baseline emission rate at 42 ppmv is 148 pounds of NOx per million standard cubic feet of gas fired. The table below summarizes the baseline information.

Baseline Activity
Average Fuel Flow Rates (klb/hr)

	1994	1995	2-yr Avg. (BA)
Gas Turbine #1	18.47	16.68	17.58
Gas Turbine #2	16.74	16.86	16.80
Gas Turbine #3	17.42	17.06	17.24

Baseline Emission Rate (BER) = 42 ppmv stack = 148 lb NOx / SCF of gas fired

The strategy activity rate is also based on the measured fuel flow rates to the gas turbines. This fuel flow rate is averaged over the time period that the DERCs were generated. The strategy emission rate is based on compliance tests of the gas turbines in 1996. This testing showed the gas turbine exhaust gas concentrations were 25 ppmv (dry, 15% oxygen). The strategy emission rate at 25 ppmv is 90 pounds of NOx per million standard cubic feet of gas fired. The table below summarized the strategy information.

Strategy Activity

	Time Period of Reduction	# of Days	Average Fuel Flow Rate (klb/hr) (SA)
Gas Turbine #1	Nov. 95 - Dec. 96	426	18.23
Gas Turbine #2	Dec. 95 - Dec. 96	396	17.57
Gas Turbine #3	Feb. 96 - Dec. 96	334	16.65

Strategy Emission Rate (SER) = 25 ppmv stack = 90 lb NOx / SCF of gas fired

The DERCs were calculated using the information on baseline and strategy activity and emission rates. A total of 304 tons of NOx DERCs have been generated. The calculation is contained in the table on the next page.

Discrete Emission Reduction Credit Calculation

	BA klb/hr	BER - lb NOx/SCF	SA klb/hr	SER - lb NOx/SCF	# Days of Reduction	Equation Used	DERC Tons
Gas Turbine #1	17.58	148	18.23	90	426	1	114
Gas Turbine #2	16.80	148	17.57	90	396	1	99
Gas Turbine #3	17.24	148	16.65	90	334	2	92
						TOTAL:	305

Equation #1: If SA > BA, Use DERC = BA*BER-SA*SER
Equation #2: If SA < BA, Use DERC = BA*BER-BA*SER

Average fuel heating value: 23,197 BTU/LB 1008 BTU/SCF

If you have any questions or require additional information, please call me at (281)834-6516.

Regards,

Rochelle M. Jozwiak
Senior Environmental Coordinator

Attachments

Cc: By Fax:
Don Duke - TNRCC, Austin

EXXON CHEMICAL COMPANY

I.D.G.C. 98
12-30-98 164

EXXON CHEMICAL

Baytown Olefins Plant
D. G. Blake
PLANT MANAGER

December 30, 1998

DISCRETE EMISSION REDUCTION CREDIT INFORMATION REQUEST RESPONSE
TNRCC ACCOUNT NO. HG-0228-H

Z 155 714 235
936

Ms. Susana M. Hildebrand
Emission Credit Trading Coordinator
Texas Natural Resource Conservation Commission
New Source Review Permits Division (MC-162)
P. O. Box 13087
Austin, Texas 78711-3087

Dear Ms. Hildebrand:

This letter is in response to your September 4, 1998, letter requesting additional information on the Discrete Emission Reduction Credit (DERC) registration for three gas turbine generators that was submitted on June 12, 1998. The DERCs were obtained by the early installation of additional steam injection facilities of the gas turbines.

The baseline emissions of the gas turbines were represented in the 1994 and 1995 TNRCC Emission Inventories. The emission inventories were submitted electronically using the Computerized Emission Inventory System (CEIS). A printout of the 1994 and 1995 emissions information for the three cogeneration units (gas turbines and heat recovery steam generators) are attached. A summary of the NOx emissions is shown in the table below.

	Gas Turbine Tons/Yr		HRSG Tons/Yr		Stack Total Tons/Yr	
FIN/EPN	1994	1995	1994	1995	1994	1995
CG-160/E-160	275	249	7	6	282	255
CG-161/E-161	250	252	6	6	256	258
CG-162/E-162	260	254	5	6	265	260

The baseline activity rate for the three gas turbines is based on measured fuel flow rates to the gas turbines. This fuel flow rate is averaged over the two-year period preceding the reduction. The baseline emission rate is based on compliance tests of the gas turbines in 1989-1990. This testing showed that the gas turbines exhaust gas concentrations were 42 ppmv (dry, 15% oxygen). The baseline emission rate at 42 ppmv is 148 pounds of NOx per million standard cubic feet of gas fired. The table below summarizes the baseline information.

3525 Decker Drive, Baytown, Texas 77520-0100
Tel: (281) 834-6161 Fax: (281) 834-6444

A Division of Exxon Corporation

Baseline Activity
Average Fuel Flow Rates (k lb/hr)

	1994	1995	2-yr avg (BA)
Gas Turbine #1	18.47	16.68	17.58
Gas Turbine #2	16.74	16.86	16.80
Gas Turbine #3	14.42	17.06	17.24

Baseline Emission Rate (BER) = 42 ppmv stack = 148 lb NOx/MMBTU

The strategy activity rate is also based on the measured fuel flow rates to the gas turbines. This fuel flow rate is averaged over the time period that the DERCs were generated. The strategy emission rate is based on compliance tests of the gas turbines in 1996. This testing showed the gas turbine exhaust gas concentrations were 25 ppmv (dry, 15% oxygen). The strategy emission rate at 25 ppmv is 90 pounds of NOx per million standard cubic feet of gas fired. The table below summarizes the strategy information.

Strategy Activity

	Time Period of Reduction	# Days	Average Fuel Flow Rate (k lb/hr) (SA)
Gas Turbine #1	Nov 95 - Dec 96	426	18.23
Gas Turbine #2	Dec 95 - Dec 96	396	17.57
Gas Turbine #3	Feb 96 - Dec 96	334	16.65

Strategy Emission Rate (SER) = 25 ppmv stack = 90 lb NOx/MMBTU

The DERCs were recalculated using the information on baseline and strategy activity and emission rates. A total of 304 tons of NOx DERCs have been generated. The calculation is contained in the table below.

Discrete Emission Reduction Credit Calculation

	BA k lb/hr	BER lb NOx/ MMBTU	SA k lb/hr	SER lb NOx/ MMBTU	# Days Reduction	Equation Used	DERC Tons
Gas Turbine #1	17.58	148	18.23	90	426	1	113
Gas Turbine #2	16.80	148	17.57	90	396	1	99
Gas Turbine #3	17.24	148	16.65	90	334	2	92
						TOTAL	304

Equation #1 SA>BA DERC=BA*BER-SA*SER
Equation #2 SA<BA DERC=BA*BER-BA*SER

Average fuel heating value: 23,197 BTU/SCF 1008 BTU/lb

If you have any questions or require additional information, please call me at (281) 834-6516.

Regards,

Cynthia L. Gleason
Staff Environmental Coordinator

CLG:dv
cc: TNRCC/Houston - 0136

CLG380/I.D.6.a.

03/14/95
10:34:57

COMPUTERIZED EMISSION INVENTORY SYSTEM
Emission Point Parameter Information

CEIS2

FIN: CG-160 GAS TURBINE NO. 1

EMISSION POINT NO: E-160 NAME: TURBINE STACK
** Changed by User **

Shutdown: N

GEOG COORD: 0 0 0 N LATITUDE 0 0 0 W LONGITUDE
UTM ZONE: 5 EASTMETERS: 305246 NORTHMETERS: 3293257

STACK/TANK DATA: DIAM: 11.00 HT: 75 VELCTY: 60.00 DEG F: 310 MOIST %:
HORIZ DISCH: N VOC CONC(PPM): 0.00 HEAT VAL:

FLARE DATA: LWR HT: MSCFM: MOL WT: HT: TEMP:

FUGITIVE DATA: LENGTH: WIDTH: DEG: OF N: HEIGHT:

Emission Factor Information

FIN	EPN		Emission Factor	Emission Factor Units		Emission Factor	Emission Factor Units
CG-160	E-160	VOC:	0		NOX:	0	
		CO :	0		SO2:	0	
		TSP:	0				

Emissions Information

	EPN	Cont Code/Name	Actual Emis Rate (Tons/Yr)	Actual Ozone Season Rate (Lbs/Day)	M e t	Ann Upset Emis Rate (Tons/Yr)	Allowable Emis Rate (Tons/Yr)	
C	E-160	10000 PART-U	2.6000	13.9000	M	0.0000	19.0000	
A	E-160	19999 TOTAL PARTICULATE	26.3000	138.9000	C	Permit: 0.0000	9910 19.0000	T
A	E-160	20000 PM10 PART-U	23.7000	125.0000	M	Permit:* 0.0000	N/A * 0.0000	
A	E-160	29999 TOTAL PM10 PARTICULATE	23.7000	125.0000	C	Permit: 0.0000	9910 0.0000	P
C	E-160	50001 NONMETHANE VOC-U	2.7000	14.5000	A	Permit:* 0.0000	N/A * 8.0000	
A	E-160	59999 VOC-TOTAL	2.7000	14.5000	C	Permit: 0.0000	9910 8.0000	V
C	E-160	70400 NITROGEN OXIDES	282.0000	1490.0000	M	Permit:* 0.0000	N/A * 415.0000	
C	E-160	70510 SULFUR DIOXIDE	1.4900	7.8000	B	Permit: 0.0000	9910 6.0000	N
C	E-160	90300 CARBON MONOXIDE	75.1000	397.0000	C	Permit: 0.0000	9910 112.0000	S
								C

03/14/95 COMPUTERIZED EMISSION INVENTORY SYSTEM CEISZ0
10:35:28 Emission Point Parameter Information

FIN: CG-161 GAS TURBINE NO. 2

EMISSION POINT NO: E-161 NAME: TURBINE STACK
** Changed by User **

Shutdown: N

GEOG COORD: 0 0 0 N LATITUDE 0 0 0 W LONGITUDE
UTM ZONE: 5 EASTMETERS: 305238 NORTHMETERS: 3293210

STACK/TANK DATA: DIAM: 11.00 HT: 75 VELCTY: 60.00 DEG F: 310 MOIST %:
HORIZ DISCH: N VOC CONC(PPM): 0.00 HEAT VAL:

FLARE DATA: LWR HT: MSCFM: MOL WT: HT: TEMP:

FUGITIVE DATA: LENGTH: WIDTH: DEG: OF N: HEIGHT:

Emission Factor Information

FIN	EPN		Emission Factor	Emission Factor Units		Emission Factor	Emission Factor Units
CG-161	E-161	VOC:	0		NOX:	0	
		CO :	0		SO2:	0	
		TSP:	0				

Emissions Information

EPN	Cont Code/Name	Actual Emis Rate (Tons/Yr)	Actual Ozone Season Rate (Lbs/Day)	M e t	Ann Upset Emis Rate (Tons/Yr)	Allowable Emis Rate (Tons/Yr)	
	[illegible]	2.4000	13.9000	M	0.0000	19.0000	
	PART-U				Permit:	9910	T
A E-161	19999	23.9000	138.9000	C	0.0000	19.0000	
	TOTAL PARTICULATE				Permit:*	N/A *	
A E-161	20000	21.5000	125.0000	M	0.0000	0.0000	
	PM10 PART-U				Permit:	9910	P
A E-161	29999	21.5000	125.0000	C	0.0000	0.0000	
	TOTAL PM10 PARTICULATE				Permit:*	N/A *	
C E-161	50001	2.5000	14.5000	A	0.0000	8.0000	
	NONMETHANE VOC-U				Permit:	9910	V
A E-161	59999	2.5000	14.5000	C	0.0000	8.0000	
	VOC-TOTAL				Permit:*	N/A *	
C E-161	70400	256.0000	1525.0000	M	0.0000	531.0000	
	NITROGEN OXIDES				Permit:	9910	N
C E-161	70510	1.4000	7.9000	B	0.0000	6.0000	
	SULFUR DIOXIDE				Permit:	9910	S
C E-161	90300	68.0000	398.0000	C	0.0000	112.0000	
	CARBON MONOXIDE				Permit:	9910	C

03/14/95 COMPUTERIZED EMISSION INVENTORY SYSTEM CEISZ(
10:35:58 Emission Point Parameter Information

FIN: CG-162 GAS TURBINE NO.3

EMISSION POINT NO: E-162 NAME: TURBINE STACK
** Changed by User **

Shutdown: N

GEOG COORD: 0 0 0 N LATITUDE 0 0 0 W LONGITUDE
UTM ZONE: 5 EASTMETERS: 305248 NORTHMETERS: 3293230

STACK/TANK DATA: DIAM: 11.00 HT: 75 VELCTY: 60.00 DEG F: 310 MOIST %:
HORIZ DISCH: N VOC CONC(PPM): 0.00 HEAT VAL:

FLARE DATA: LWR HT: MSCFM: MOL WT: HT: TEMP:

FUGITIVE DATA: LENGTH: WIDTH: DEG: OF N: HEIGHT:

Emission Factor Information

FIN	EPN		Emission Factor	Emission Factor Units		Emission Factor	Emission Factor Units
CG-162	E-162	VOC:	0		NOX:	0	
		CO :	0		SO2:	0	
		TSP:	0				

Emissions Information

¶	EPN	¶Cont Code/Name	Actual Emis Rate (Tons/Yr)	Actual Ozone Season Rate (Lbs/Day)	Me t	Ann Upset Emis Rate (Tons/Yr)	Allowable Emis Rate (Tons/Yr)	
C	E-162	10000 PART-U	2.5000	14.1000	M	0.0000	19.0000	
						Permit:	9910	T
A	E-162	19999 TOTAL PARTICULATE	24.7000	141.1000	C	0.0000	19.0000	
						Permit:	* N/A *	
A	E-162	20000 PM10 PART-U	22.2000	127.0000	M	0.0000	0.0000	
						Permit:	9910	P
A	E-162	29999 TOTAL PM10 PARTICULATE	22.2000	127.0000	C	0.0000	0.0000	
						Permit:	* N/A *	
C	E-162	50001 NONMETHANE VOC-U	2.6000	14.8000	A	0.0000	8.0000	
						Permit:	9910	V
A	E-162	59999 VOC-TOTAL	2.6000	14.8000	C	0.0000	8.0000	
						Permit:	* N/A *	
C	E-162	70400 NITROGEN OXIDES	265.0000	1525.0000	M	0.0000	531.0000	
						Permit:	9910	N
C	E-162	70510 SULFUR DIOXIDE	1.4000	8.0000	B	0.0000	6.0000	
						Permit:	9910	S
C	E-162	90300 CARBON MONOXIDE	70.8000	407.0000	C	0.0000	112.0000	
						Permit:	9910	C

05/06/96 COMPUTERIZED EMISSION INVENTORY SYSTEM CEISZ0
12:41:03 Emission Point Parameter Information

FIN: CG-160 GAS TURBINE NO. 1

EMISSION POINT NO: E-160 NAME: TURBINE STACK

Shutdown: N

GEOG COORD: 0 0 0 N LATITUDE 0 0 0 W LONGITUDE
UTM ZONE: 5 EASTMETERS: 305246 NORTHMETERS: 3293257

STACK/TANK DATA: DIAM: 11.00 HT: 75 VELCTY: 60.00 DEG F: 310 MOIST %:
HORIZ DISCH: N VOC CONC(PPM): 0.00 HEAT VAL:

FLARE DATA: LWR HT: MSCFM: MOL WT: HT: TEMP:

FUGITIVE DATA: LENGTH: WIDTH: DEG: OF N: HEIGHT:

Emission Factor Information

FIN	EPN		Emission Factor	Emission Factor Units		Emission Factor	Emission Factor Units
CG-160	E-160	VOC:	0		NOX:	0	
		CO :	0		SO2:	0	
		TSP:	0				

Emissions Information

	EPN	Cont Code/Name	Actual Emis Rate (Tons/Yr)	Actual Ozone Season Rate (Lbs/Day)	M e t	Ann Upset Emis Rate (Tons/Yr)	Allowable Emis Rate (Tons/Yr)	
C	E-160	10000 PART-U	2.4000	14.5000	M	0.0000	0.0000	
X	E-160	19999 TOTAL PARTICULATE	2.4000	14.5000	C	0.0000 Permit:	0.0000 * N/A *	T
C	E-160	20000 PM10 PART-U	21.4000	130.0000	M	0.0000	0.0000	
X	E-160	29999 TOTAL PM10 PARTICULATE	21.4000	130.0000	C	0.0000 Permit:	0.0000 * N/A *	P
C	E-160	50001 NONMETHANE VOC-U	2.5000	15.0000	A	0.0000	8.0000	
X	E-160	59999 VOC-TOTAL	2.5000	15.0000	C	0.0000 Permit:	8.0000 * N/A *	V
C	E-160	70400 NITROGEN OXIDES	255.0000	1543.0000	M	0.0000 Permit:	415.0000 9910	N
C	E-160	70510 SULFUR DIOXIDE	1.3400	8.2000	B	0.0000 Permit:	6.0000 9910	S
C	E-160	90300 CARBON MONOXIDE	67.8000	410.0000	C	0.0000 Permit:	112.0000 9910	C

05/06/96 COMPUTERIZED EMISSION INVENTORY SYSTEM CEISZ(
12:41:05 Emission Point Parameter Information

FIN: CG-161 GAS TURBINE NO. 2

EMISSION POINT NO: E-161 NAME: TURBINE STACK

Shutdown: N
GEOG COORD: 0 0 0 N LATITUDE 0 0 0 W LONGITUDE
UTM ZONE: 5 EASTMETERS: 305238 NORTHMETERS: 3293210

STACK/TANK DATA: DIAM: 11.00 HT: 75 VELCTY: 60.00 DEG F: 310 MOIST %:
HORIZ DISCH: N VOC CONC(PPM): 0.00 HEAT VAL:

FLARE DATA: LWR HT: MSCFM: MOL WT: HT: TEMP:

FUGITIVE DATA: LENGTH: WIDTH: DEG: OF N: HEIGHT:

Emission Factor Information

FIN	EPN		Emission Factor	Emission Factor Units		Emission Factor	Emission Factor Units
CG-161	E-161	VOC:	0		NOX:	0	
		CO :	0		SO2:	0	
		TSP:	0				

Emissions Information

¶	¶	EPN	¶Cont Code/Name	¶ Actual Emis Rate (Tons/Yr)	¶Actual Ozone Season Rate (Lbs/Day)	¶M¶e¶t¶	¶ Ann Upset Emis Rate (Tons/Yr)	¶ Allowable Emis Rate (Tons/Yr)	¶
C	E-161	10000	2.4000	14.4000	M	0.0000	0.0000		
		PART-U				Permit:			T
X	E-161	19999	2.4000	14.4000	C	0.0000	0.0000		
		TOTAL PARTICULATE				Permit:	* N/A *		
C	E-161	20000	21.6000	129.0000	M	0.0000	0.0000		
		PM10 PART-U				Permit:			P
X	E-161	29999	21.6000	129.0000	C	0.0000	0.0000		
		TOTAL PM10 PARTICULATE				Permit:	* N/A *		
C	E-161	50001	2.5000	14.9000	A	0.0000	8.0000		
		NONMETHANE VOC-U				Permit:	9910		V
X	E-161	59999	2.5000	14.9000	C	0.0000	8.0000		
		VOC-TOTAL				Permit:	* N/A *		
C	E-161	70400	258.0000	1532.0000	M	0.0000	531.0000		
		NITROGEN OXIDES				Permit:	9910		N
C	E-161	70510	1.4000	8.1000	B	0.0000	6.0000		
		SULFUR DIOXIDE				Permit:	9910		S
C	E-161	90300	68.5000	407.0000	C	0.0000	112.0000		
		CARBON MONOXIDE				Permit:	9910		C

05/06/96 COMPUTERIZED EMISSION INVENTORY SYSTEM CEISZ(
12:41:31 Emission Point Parameter Information

FIN: CG-162 GAS TURBINE NO.3

EMISSION POINT NO: E-162 NAME: TURBINE STACK

Shutdown: N
GEOG COORD: 0 0 0 N LATITUDE 0 0 0 W LONGITUDE
UTM ZONE: 5 EASTMETERS: 305248 NORTHMETERS: 3293230

STACK/TANK DATA: DIAM: 11.00 HT: 75 VELCTY: 60.00 DEG F: 310 MOIST %:
HORIZ DISCH: N VOC CONC(PPM): 0.00 HEAT VAL:

FLARE DATA: LWR HT: MSCFM: MOL WT: HT: TEMP:

FUGITIVE DATA: LENGTH: WIDTH: DEG: OF N: HEIGHT:

Emission Factor Information

FIN	EPN		Emission Factor	Emission Factor Units		Emission Factor	Emission Factor Units
CG-162	E-162	VOC:	0		NOX:	0	
		CO :	0		SO2:	0	
		TSP:	0				

Emissions Information

¶	¶	EPN	¶Cont Code/Name	¶ Actual Emis Rate (Tons/Yr)	¶Actual Ozone Season Rate (Lbs/Day)	¶M¶e¶t¶	¶ Ann Upset Emis Rate (Tons/Yr)	¶ Allowable Emis Rate (Tons/Yr)	¶
C	E-162		10000 PART-U	2.4000	14.4000	M	0.0000	0.0000	
							Permit:		T
X	E-162		19999 TOTAL PARTICULATE	2.4000	14.4000	C	0.0000	0.0000	
							Permit:*	N/A *	
C	E-162		20000 PM10 PART-U	21:8000	129.0000	M	0.0000	0.0000	
							Permit:		P
X	E-162		29999 TOTAL PM10 PARTICULATE	21.8000	129.0000	C	0.0000	0.0000	
							Permit:*	N/A *	
C	E-162		50001 NONMETHANE VOC-U	2.5000	15.0000	A	0.0000	8.0000	
							Permit:	9910	V
X	E-162		59999 VOC-TOTAL	2.5000	15.0000	C	0.0000	8.0000	
							Permit:*	N/A *	
C	E-162		70400 NITROGEN OXIDES	260.0000	1537.0000	M	0.0000	531.0000	
							Permit:	9910	N
C	E-162		70510 SULFUR DIOXIDE	1.4000	8.1000	B	0.0000	6.0000	
							Permit:	9910	S
C	E-162		90300 CARBON MONOXIDE	69.3000	408.0000	C	0.0000	112.0000	
							Permit:	9910	C

I.D. No. 172
9-4-98

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

September 4, 1998

Ms. Cynthia L. Gleason
Exxon Chemical Company
3525 Decker Drive
Baytown, Texas 77520-0100

Re: Administrative Review
Discrete Emission Reduction Credits

Dear Ms. Gleason

This will acknowledge receipt of your letter dated June 12, 1998 regarding the generation of Discrete Emission Reduction Credits (DERCs). This letter addresses the following registration:

Account No.	Unit	County
HG-0028-H	Discrete Emission Reduction	Harris

We have determined that the information contained in your registration is incomplete, and additional information is needed to enable us to continue with our review. Please furnish the information indicated as follows:

1. Baseline emissions prior to the emission reduction must have been reported or represented in a 1990 or subsequent emissions inventory. Provide copies of the emission inventory that contains this information or describe how this requirement is otherwise satisfied.

2. Provide backup documentation to demonstrate the baseline emission rate and the baseline activity rate. The baseline activity is needed to calculate the correct amount of DERCs generated (See equations in Item No. 3). Also provide information on how the baseline activity rate is derived. The baseline activity should be based on activity levels over a 24-month period preceding the reduction. State the specific source for emission factors used.

Re: Administrative Review

3. The incorrect equation was used to generate DERCs. Please recalculate as follows:

If SA < BA:
DERC = *baseline activity * baseline emission rate - baseline activity* strategy emission rate*

If SA ≥ BA
DERC = *baseline activity * baseline emission rate - strategy activity* strategy emission rate*

After receipt of all the additional information, we will continue the review of your request. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible. Note that although the registration was incomplete, registration prior to June 23, 1998 meets the rule requirements for credits generated prior to the effective date of the rule. Once the registration is complete, the DERCs will be entered into the Bank Registry and are eligible for use.

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, please contact me at (512) 239-1562 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.

Sincerely,

Susana M. Hildebrand
Emission Credit Trading Coordinator
New Source Review Permits Division

SH/pl

cc: Ms. Orbie Ratcliff, Air Section Manager, Houston

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 21, 1999

Ms. Cynthia L. Gleason
Staff Environmental Coordinator
Exxon Chemical Company
3525 Decker Drive
Baytown, Texas 77520-0100

Re: Administrative Review
Discrete Emission Reduction Credits
Baytown, Harris County
Account ID No. HG-0228-H

Dear Ms. Gleason:

This will acknowledge receipt of your letter dated June 15, 1998 regarding the generation of Discrete Emission Reduction Credits (DERCs). We have determined that the information contained in your registration is complete. The following credits will be deposited in the TNRCC Emissions Registry:

Nitrogen Oxides - 303 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 to me at Texas Natural Resource Conservation Commission, Office of Permitting, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 7811-3087.

Re: 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 Permitting, New Source Review Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Donald A. Duke

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

DD/pl

cc: Ms. Orbie Ratcliff, Air Section Manager, Houston
Mr. Rob Barrett, Director, Harris County Pollution Control Department, Pasadena

Record No. 66832