

AIR DERC_100225945-410084_
USE_20160408_Use_D2768

04/08/2016 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 410084 STATUS: P
RECEIVED: 04/01/2015 PROJTYPE: BUSE

DISP CODE: C ✓
ISSUED DT:
SUP-DISP DATE: 4/8/16

STAFF ASSIGNED TO PROJECT:
MERCADO, PE, MARIE

PROJECT NOTES:

PROJECT HOLD: ANNUAL COMPLIANCE REPORT PROJECT 410070 MUST BE COMPLETED PRIOR TO PROCESSING THIS PROJECT. PROJECT 410070 WAS COMPLETED ON 04/04/2016.
USE PERIOD: JANUARY 1, 2014 TO DECEMBER 31, 2014. 2014 CONTROL PERIOD.
ASSOCIATED INTENT PROJECT: 409389.

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: THE DOW CHEMICAL COMPANY
CUSTOMER REGISTRY ID: CN600356976

PORTFOLIO DATA

NUMBER: P0182 NAME: DOW TEXAS OPERATIONS FREEPORT - RN100225945

SITE DATA

ACCOUNT: BL0082R
REG ENTITY ID: RN100225945
SITE NAME: DOW TEXAS OPERATIONS FREEPORT
COUNTY: BRAZORIA
LOCATION: 2301 N BRAZOSPORT BLVD, STE B1226,
FREEPORT (HWY 288)

NEAREST CITY: FREEPORT

CONTACT DATA

NAME: PRENTICE C. JAMES TITLE: REGIONAL EH&S MANAGER
STREET: 332 SH 332E, APB2A1 CITY/STATE, ZIP: LAKE JACKSON, TX , 77566-0
PHONE: 979-238-1443 ext 0
Email: pcjames@dow.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2015-04-09 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:
TONS: 1700.90 DOLLARS: 0
CERTIFICATE NO.: D2551 COUNTY : BRAZORIA

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE
DATE ENTERED: 2015-04-09 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE1

DELETED DATE: EFFECTIVE YEAR: 2014
TONS: 0 DOLLARS: 0
CERTIFICATE NO.: 0 COUNTY : BRAZORIA

D-2768

COMPANY DATA

COMPANY NAME: THE DOW CHEMICAL COMPANY
CUSTOMER REGISTRY ID: CN600356976

PORTFOLIO DATA

NUMBER: P0182 NAME: DOW TEXAS OPERATIONS FREEPORT - RN100225945

SITE DATA

ACCOUNT: BL0082R

REG ENTITY ID: RN100225945

SITE NAME: DOW TEXAS OPERATIONS FREEPORT

COUNTY: BRAZORIA

NEAREST CITY: FREEPORT

LOCATION: 2301 N BRAZOSPORT BLVD, STE B1226,
FREEPORT (HWY 288)

CONTACT DATA

NAME: PRENTICE C. JAMES

TITLE: REGIONAL EH&S MANAGER

STREET: 332 SH 332E, APB2A1 CITY/STATE, ZIP: LAKE JACKSON, TX , 77566-0

PHONE: 979-238-1443 ext 0

Email: pcjames@dow.com

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2016-04-07 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: 1299.10

DOLLARS: 0

CERTIFICATE NO.: D2768 COUNTY : BRAZORIA

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2016-04-07 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE1

DELETED DATE:

EFFECTIVE YEAR: 2014

TONS: 0

DOLLARS: 0

CERTIFICATE NO.: 0 COUNTY : BRAZORIA

TRACKING ACTIVITIES

PROJECT

SUBMITTED :

03/30/2015 PROJECT HOLD :

04/09/2015 04/04/2016 PM RECEIVED DATE : 04/09/2015

PROJECT COMPLETED : 4/13/16

DISCRETE EMISSION CREDIT USE TECHNICAL REVIEW

Project No.:	410084	Customer Reference No.:	CN600356976
Project Type:	BUSE	Regulated Entity No.:	RN100225945
Company:	The Dow Chemical Company	Site Name:	Dow Texas Operations Freeport
City:	Freeport	County:	Brazoria
Project Manager:	Ms. Marie Mercado, P.E.	Portfolio:	PO182

PROJECT OVERVIEW

The Dow Chemical Company (Dow) submitted a Notice of Use of Discrete Emission Credits (Form DEC-3), received April 1, 2015, postmarked March 30, 2015, for the use of Discrete Emission Reduction Credits (DERC) for compliance with the Mass Emissions Cap and Trade (MECT) Program at the Dow Texas Operations Freeport site for the 2014 control period (January 1, 2014 to December 31, 2014).

Dow intended to use 3,000 tons of nitrogen oxides (NO_x) DERCs in lieu of MECT allowances, at a ratio of 10 DERCs for one allowance, in accordance with 30 Texas Administrative Code (TAC) §101.356(h)(2). Based on the information provided in the Form DEC-3 and the Annual Compliance Report (Form ECT-1) that was received from Dow on April 1, 2015, no DERC-related allowances were needed for the 2014 control period.

A total of 3,000 tons of DERCs were set aside from DERC certificates D-2551 (1,700.9 tons) and D-2768 (1,299.1 tons) in intent project number 409389. Since no DERCs were used, the DERCs set aside from these certificates will be returned to Dow for future use. Because the full amount from each certificate was set aside in the intent project, the DERCs will be returned on the same certificate numbers. No new certificates will be generated.

DISCRETE EMISSION CREDIT USE

Dow had sufficient MECT allowances to cover the 2014 NO_x emissions from the MECT-applicable facilities at the Dow Texas Operations Freeport site. Therefore, no DERC-related allowances were needed. Refer to MECT report project number 410070 for the actual NO_x emissions reported from the Dow Texas Operations Freeport site for the 2014 control period.

CONCLUSION

Dow did not need to use DERCs to cover the NO_x emissions from the Dow Texas Operations Freeport site during the 2014 control period. Therefore, the DERCs set aside in intent project number 409389 will be held for use in intent project number 410311. Certificate D-2551 was issued to Dow on October 16, 2010, and Certificate D-2768 was issued on May 19, 2011.

Marie Mercado 4/13/16
Project Manager Date

Joseph Musa 4/15/16
Peer Reviewer Date



#410084

Form DEC-3 (Page 1)

Receiver

MM

Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379) - 1 2015

Intent Project #409389

Air Quality Division

I. COMPANY IDENTIFYING INFORMATION			
A. Company Name: The Dow Chemical Company ✓			
B. Mailing Address: 2301 Brazosport Blvd.			
City: Freeport	State: TX	Zip Code: 77541	
Telephone: 979-238-1443		Fax: 979-238-0352	
B. TCEQ Customer Identification Number (CN): CN600356976 ✓			
C. Site Name: Dow Texas Operations Freeport ✓			
Street Address (If no street address, give driving directions to site): 2301 Brazosport Blvd.			
Nearest City: Freeport ✓		Zip Code: 77541	County: Brazoria ✓
D. TCEQ Regulated Entity Number (RN): RN100225945 ✓			
E. TCEQ Account Number (if applicable): BL0082R ✓ PO182			
F. Primary SIC: 2869		Air Permit Number: n/a	
II. TECHNICAL CONTACT IDENTIFYING INFORMATION			
A. Technical Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : Prentice C. James			
Technical Contact Title: Regional EH&S Manager			
Mailing Address: 2301 N. Brazosport Blvd., B-101 332 SH 332E, APB21			
City: Freeport Lake Jackson	State: TX	Zip Code: 77541 666	
Telephone: 979-238-1443	Fax: 979-238-0317	E-mail: pcjames@dow.com	
III. COMPANY CONTACT IDENTIFYING INFORMATION			
A. Company Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) Prentice C. James			
Technical Contact Title: Regional EH&S Manager			
Mailing Address: 2301 N. Brazosport Blvd., B-101			
City: Freeport	State: TX	Zip Code: 77541	
Telephone: 979-238-1443	Fax: 979-238-0317	E-mail: pcjames@dow.com	
IV. Mass Emission Cap and Trade Program (MECT)			
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Year DERC Generated: 1994-1997 Year of use: 2014 Ratio of DERC to Allowance: 10 to 1			
Note: If DERC use is to comply with MECT then go to Section X			
V. Use Period			
Use Start Date: 01/01/2014		Use End Date: 12/31/2014	



Form DEC-3 (Page 1)
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: **n/a**

VII. Most Stringent Emission Rate

Describe basis for most stringent allowable emission rate:

☐ Permit : _____ ☐ RACT : _____ ☐ Other: _____

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



Form DEC-3 (Page 1)
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>0.0</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS Used	CO: _____	NO _x : <u>0.0</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

XI. DERC INFORMATION

Name of the DERC Generator: Dow Texas Operations Freeport

DERC Generator Regulated Entity Number: 100225945

Certificate number of the DERCS acquired or to be acquired: D2551 and D2768

Note: The certificate number is assigned by the TCEQ

XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

I, Prentice C. James, 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: March 27, 2015

Title Regional EH&S Manager

FIRM



7011 1570 0003 6743 1680



0006550111 APR 01 2015
MAILED FROM ZIP CODE 77541

**PRIORITY[®]
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INSURANCE INCLUDED *

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* Domestic only

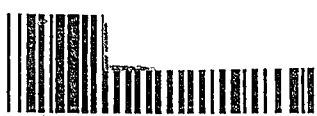
USED INTERNATIONALLY,
CUSTOMS DECLARATION
LABELS BE REQUIRED.

FROM:

Prentice C. James
The Dow Chemical Company
2301 N. Brazosport Blvd. B-1214 #13
Freeport, TX 77541-3257

TO:

Mr. Brandon Greulich
Texas Commission on Environmental Quality
Emission Banking and Trading Program MC 206
P.O. Box 13087
Austin, TX 78711-3087



00001000014

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JR

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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

April 13, 2016

Mr. Prentice C. James
Regional EH&S Specialist
The Dow Chemical Company
332 State Highway 332 East, APB2A1
Lake Jackson, Texas 77566

Re: Use of Discrete Emission Credits
Dow Texas Operations Freeport
Freeport, Brazoria County
Customer Reference Number: CN600356976
Regulated Entity Reference Number: RN100225945
Portfolio Number: P0182

Dear Mr. James:

This letter is in response to Dow Texas Operations Freeport site's Notice of Use of Discrete Emission Credits (Form DEC-3) received on April 1, 2015, postmarked March 30, 2015, regarding the use of nitrogen oxides (NO_x) discrete emission reduction credits (DERC) to supplement Mass Emissions Cap and Trade (MECT) Program allowances for the purpose of compliance with the MECT Program under 30 Texas Administrative Code §101.356(h).

The Form DEC-3 indicated that no NO_x DERCs were used during the 2014 control period for compliance with the MECT Program. Therefore, the 1,700.9 tons and 1,299.1 tons of NO_x DERCs set aside from certificates D-2551 and D-2768, respectively, are released to The Dow Chemical Company and available for use in intent project number 410311.

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) 239-4496 or write to the Texas Commission on Environmental Quality, Office of Air, Air Quality Division (MC-206), PO Box 13087, Austin, Texas 78711-3087.

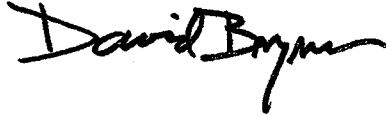
Mr. Prentice C. James

Page 2

April 13, 2016

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

Sincerely,

A handwritten signature in black ink, appearing to read "David Brymer". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Brymer".

David Brymer, Director
Air Quality Division

DB/MM/jm

cc: Air Section Manager, Region 12 – Houston

Ms. Karen Carroll, Director, Environmental Health, Brazoria County Health Department,
City of Angleton

Project Number: 410084

Marie Mercado

From: Marie Mercado
Sent: Wednesday, April 13, 2016 2:35 PM
To: 'pcjames@dow.com'
Cc: 'karenc@brazoria-county.com'
Subject: TCEQ EBT Documents - DERC Use - Dow Texas Operations Freeport
Attachments: 410084 DCUS The Dow Chemical Company Dow Texas Operations Freeport
RN100225945 (P0182) (2014 Use).pdf

The Emissions Banking and Trading (EBT) program is transitioning to email correspondence and will not be mailing paper copies of these documents.

Please see the attached EBT document(s) for project number 410084. For additional information about this project, visit the [TCEQ EBT Database](#). 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
(512) 239-4900
ebt@tceq.texas.gov

Sign up to receive e-mail updates on EBT programs. Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.

Banking and Trading Route Slip

DERC USE
(ZERO USE)

AIR QUALITY DIVISION Emissions Banking and Trading Program (EBTP)			
Company Name: <u>The Dow Chemical Company</u> <u>Dow Texas Operations Freeport RN100 225945 (PO 182)</u>			
Project Number: <u>410084</u>			
Type of Letter Correspondence: <u>DCTR; DCUS</u>			
Letter Document Number(s): <u>26453; 26454</u>			
Certificate Number(s): <u>D-2551; D-2768</u>			
Review and Approval	Initial and Date	Comments/Special Instructions	
<u>Denise Patton</u> EBTP; Work Lead EBTP	<u>—</u>	<u>—</u>	
Author/Creator Review	<u>MM</u> <u>4/13/16</u>		
Peer Review Completed	<u>JM 4/11/16</u>		
Author/Creator	<u>MM</u> <u>4/8/16</u>	Copies Made	Date
		<u>4/13/16</u>	<u>MM</u>
		E-Mailed	Date
<u>4/13/16</u>	<u>MM</u>		
Please return Routing Slip and Project Paperwork to <u>Brandon Greulich</u> , MC-206, Ext. 4904			

Denise Patton

3195

C
4/13/16
MM