

AIR DERC\_100225945-409183\_  
USE\_20140818\_Use\_D2768

## 08/18/2014 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 409183      STATUS: P  
RECEIVED: 03/31/2014      PROJTYPE: BUSEDISP CODE: C  
ISSUED DT:  
SUP-DISP DATE: 8/18/14

## STAFF ASSIGNED TO PROJECT:

RUANO, MELISSA

## PROJECT NOTES:

USE PERIOD 1/1/2013 - 12/31/2013 (FOR COMPLIANCE WITH MECT). INTENT PROJECT #408402  
PROJECT ON HOLD. PROJECT CANNOT BE CLOSED UNTIL THE 2013 ANNUAL REPORT (PROJECT 409184) HAS BEEN CLOSED.

## 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

NEAREST CITY: FREEPORT

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

## CONTACT DATA

NAME: PRENTICE C. JAMES

TITLE: EH&amp;S SPECIALIST

STREET: 2301 N BRAZOSPORT BOULEVARD B 101 CITY/STATE, ZIP: FREEPORT, TX, 77541-3257

PHONE: 979-238-1443 ext 0

Email: pcjames@dow.com

## TRANSACTION DATA

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2014-04-26 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: NOX

TONS: 1700.90

DOLLARS: 0

ALLOWANCE

CERTIFICATE NO.: D2551 COUNTY : BRAZORIA

## TRANSACTION DATA

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2014-04-26 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR: 2013

CONTAMINATE: NOX

TONS: 0

DOLLARS: 0

ALLOWANCE1

CERTIFICATE NO.: 0 COUNTY : BRAZORIA

## 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

File w/

D2768

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

**CONTACT DATA**

NAME: PRENTICE C. JAMES

TITLE: EH&amp;S SPECIALIST

STREET: 2301 N BRAZOSPORT BOULEVARD B 101 CITY/STATE, ZIP: FREEPORT, TX , 77541-3257

PHONE: 979-238-1443 ext 0

Email: pcjames@dow.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2014-08-04 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE

DELETED DATE:

EFFECTIVE YEAR:

TONS: 1299.10

DOLLARS: 0

CERTIFICATE NO.: D2768 COUNTY : BRAZORIA

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2014-08-04 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE1

DELETED DATE:

EFFECTIVE YEAR: 2013

TONS: 0

DOLLARS: 0

CERTIFICATE NO.: 0 COUNTY : BRAZORIA

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**TRACKING ACTIVITIES**

PM RECEIVED DATE : 04/28/2014 PROJECT HOLD : 04/28/2014 08/13/2014 LETTER ISSUED :

## DISCRETE EMISSION CREDIT USE TECHNICAL REVIEW

Project No.:	409183	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. Melissa Ruano	Portfolio:	P0182

### PROJECT OVERVIEW

The Dow Chemical Company (Dow) submitted a Notice of Use of Discrete Emission Credits (Form DEC-3), received March 31, 2014, 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 2013 control period (January 1, 2013 to December 31, 2013).

Dow intended to use 3,000 tons of nitrogen oxides (NO<sub>x</sub>) DERCs in lieu of MECT allowances, at a ratio of ten DERCs for one allowance, in accordance with 30 Texas Administrative Code (TAC) §101.356(h)(5). Based on the information provided in the Form DEC-3 and the Annual Compliance Report (Form ECT-1) that was received from Dow on March 31, 2014, no DERC-related allowances were needed for the 2013 control period.

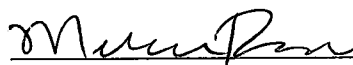
A total of 3,000 tons of DERCs were set aside from DERC certificates D-2551 (1,700.9 tons) and D-2768 (1,299.1 tons) in intent project number 408402. Since no DERCs were used, the DERCs set aside from these certificates will be returned to Dow for future use. Because the full amount from each certificate 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 2013 NO<sub>x</sub> emissions from the MECT applicable facilities at the Dow Texas Operations Freeport site; therefore no DERC-related allowances were needed. Refer to MECT annual report project number 409184 for the actual NO<sub>x</sub> emissions reported from the Dow Texas Operations Freeport site for the 2013 control period.

### CONCLUSION

Dow did not need to use DERCs to cover the NO<sub>x</sub> emissions from the Dow Texas Operations Freeport site during the 2013 control period. Therefore, the DERCs set aside in intent project number 408402 will be returned to Dow. Certificate D-2551 was issued to Dow on October 16, 2010, and Certificate D-2768 was issued on May 19, 2011.

 8/18/14  
Project Manager Date

 8/22/14  
Peer Reviewer Date

 8/25/2014  
Work Lead Date



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

RECEIVED  
MAR 31 2014  
AIR QUALITY  
DIVISION

409183

<b>I. COMPANY IDENTIFYING INFORMATION</b>			
A. Company Name: <b>The Dow Chemical Company</b>			
Mailing Address: <b>2301 Brazosport Blvd.</b>			
City: <b>Freeport</b>	State: <b>TX</b>	Zip Code: <b>77541</b>	
Telephone: <b>979-238-1443</b>		Fax: <b>979-238-0352</b>	
B. TCEQ Customer Number (CN): <b>600356976</b>			
C. Site Name: <b>Dow Texas Operations Freeport</b>			
Street Address (If no street address, give driving directions to site): <b>2301 Brazosport Blvd.</b>			
Nearest City: <b>Freeport</b>		Zip Code: <b>77541</b>	County: <b>Brazoria</b>
D. TCEQ Regulated Entity Number (RN): <b>100225945</b>			
E. TCEQ Air Account Number: (if applicable): <b>BL0082R</b>			
F. Primary SIC: <b>2869</b>		Air Permit Number: <b>n/a</b>	
<b>II. TECHNICAL CONTACT IDENTIFYING INFORMATION</b>			
A. Technical Contact Name: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr. ) : <b>Prentice C. James</b>			
Technical Contact Title: <b>Regional EH&amp;S Manager</b>			
Mailing Address: <b>2301 N. Brazosport Blvd., B-101</b>			
City: <b>Freeport</b>	State: <b>TX</b>	Zip Code: <b>77541</b>	
Telephone: <b>979-238-1443</b>	Fax: <b>979-238-0317</b>	E-mail: <b>pcjames@dow.com</b>	
<b>III. COMPANY CONTACT IDENTIFYING INFORMATION</b>			
A. Company Contact Name: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr. ) : <b>Prentice C. James</b>			
Company Contact Title: <b>Regional EH&amp;S Manager</b>			
Mailing Address: <b>2301 N. Brazosport Blvd., B-101</b>			
City: <b>Freeport</b>	State: <b>TX</b>	Zip Code: <b>77541</b>	
Telephone: <b>979-238-1443</b>	Fax: <b>979-238-0317</b>	E-mail: <b>pcjames@dow.com</b>	
<b>IV. Mass Emission Cap and Trade Program (MECT)</b>			
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: <b>2001</b> Year of use: <b>2013</b> Ratio of DERC to Allowance: <b>10</b> to <b>1</b>			
Note: If DERC use is to comply with MECT then go to Section X			
<b>V. Use Period</b>			
Use Start Date: <b>01/01/2013</b>		Use End Date: <b>12/31/2013</b>	



**Form DEC-3 (Page 2)**  
**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 <sub>x</sub> : <u>0.0</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
<b>Total DERCS Used</b>	CO: _____	NO <sub>x</sub> : <u>0.0</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	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: Prentice C. James Date: March 27, 2014

Title Regional EH&S Manager

INTENT PROJECT	INTENT RECEIVED	INTENT CERTIFICATE	POLLUTANT	INTENT AMOUNT	TOTAL AMOUNT	PERIOD START DATE	PERIOD END DATE	MECT RATIO	INTENT FLAG	USE PROJECT	USE RECEIVED	USE AMOUNT	USE CERTIFICATE
408402	9/23/2013	D2551	NOX	1700.9	1700.9	1/1/2013	12/31/2013	10	YES	409183	3/31/2014		
408402	9/23/2013	D2768	NOX	1299.1	1299.1	1/1/2013	12/31/2013	10	YES	409183	3/31/2014		



**The Dow Chemical Company**  
2301 N. Brazosport Blvd.  
Freeport, Texas 77541-3257

March 27, 2014

CERTIFIED MAIL 7012 3050 0001 6057 3758

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

Re: The Dow Chemical Company, CN600356976  
Dow Texas Operations, Freeport RN100225945  
30 TAC 101.359 MECT Reporting - Annual ECT-1 Report

Dear Mr. Greulich:

This submittal fulfills the NO<sub>x</sub> MECT annual reporting requirements of §101.359 for sites within the Houston-Galveston-Brazoria nonattainment area. This report is for the 2013 control period. As stipulated by §101.359, this annual report contains

- (1) a completed ECT-1 Form
- (2) the amount of actual nitrogen oxides (NO<sub>x</sub>) emissions during the preceding control period;
- (3) the method of determining NO<sub>x</sub> emissions
- (4) monitoring protocol and results,
- (5) calculation methodology,
- (6) level of activity,
- (7) emission factor;
- (8) a summary of all final trades which impact the control period; and
- (9) documentation supporting the reported activity level and emission factor for each facility. This documentation consists of the LOA on a monthly basis.

The FINs included in this report were the only FINs active during the 2013 control period. FINs not listed were shutdown, demolished, idled, mothballed, etc. prior to the 2013 control period.

For future correspondence, please contact Prentice C. James at (979) 238-1443 or via e-mail at [pcjames@dow.com](mailto:pcjames@dow.com).

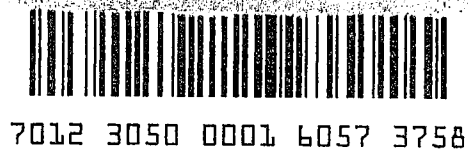
Sincerely,

Prentice C. James  
Regional EH&S Specialist  
The Dow Chemical Company

XC:	Enforcement Team Manager	Air Program, OCE/FO MC 174 TCEQ, PO Box 13087, Austin, TX 78711-3087
	Air Program Manager	TCEQ OCE/FO Region XII, 5425 Polk Ave. Suite H Houston, TX 77023-1423
	TCEQ AEI Engineer Julia Segura	Texas Commission on Environmental Quality Emissions Assessment Section, MC 164 P.O. Box 13087 Austin, TX 78711-3087
Email	Fran Falcon File copy	B-101 B-101 library



**RIC**  
**MAIL** ★



7012 3050 0001 6057 3758

**FROM:**

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



1006



78711

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INSURANCE INCLUDED\*

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\* Domestic only

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MAR 31 2014

**TCEQ MAIL CENTER**  
**CS**

**TO:**

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

USED INTERNATIONALLY,  
CUSTOMS DECLARATION  
LABEL MAY BE REQUIRED.



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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 2, 2014

Mr. Prentice C. James  
Regional EH&S Specialist  
The Dow Chemical Company  
2301 North Brazosport Boulevard, B-101  
Freeport, Texas 77541

Re: Use of Discrete Emission Credits  
Dow Texas Operations Freeport  
Freeport, Brazoria County  
Customer Reference Number: CN600356976  
Regulated Entity Reference Number: RN100225945  
Portfolio Number: PO182

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 March 31, 2014 regarding the use of nitrogen oxides (NO<sub>x</sub>) 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 Texas Administrative Code (TAC) §101.356(h)(5).

The Form DEC-3 indicated that no NO<sub>x</sub> DERCs were used during the 2013 control period for compliance with the MECT program; therefore, the 1,700.9 tons and 1,299.1 tons of NO<sub>x</sub> DERCs set aside from Certificate D-2551 and D-2768, respectively, are released and available at this time for future use.

Certificate D-2551, in the amount of 1,700.9 tons of NO<sub>x</sub> DERCs, and Certificate D-2768, in the amount of 1,299.1 tons of NO<sub>x</sub> DERCs, were issued to The Dow Chemical Company on October 16, 2010 and May 19, 2011, respectively. Both certificates have been returned to the Texas Commission on Environmental Quality (TCEQ) Discrete Emission Credit Registry and may be transferred or sold to another owner for use per the requirements of §§101.370 through 101.379.

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. Melissa Ruano at (512) 239-4496 or write to the Texas Commission on Environmental Quality, Office of Air, Air Quality Division (MC-206), P.O. Box 13087, Austin, Texas 78711-3087.

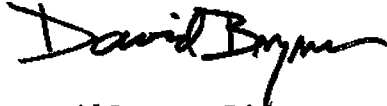
Mr. Prentice C. James

Page 2

September 2, 2014

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 a long horizontal stroke extending to the right.

David Brymer, Director  
Air Quality Division

DB/MR/mm

cc: Air Section Manager, Region 12 – Houston

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

Project Number: 409183

## Banking and Trading Route Slip

<b>AIR QUALITY DIVISION</b> <b>Emissions Banking and Trading Program (EBTP)</b>				
<b>Company Name:</b> <span style="font-family: cursive;">The Dow Chemical Company</span>				
<b>Project Number:</b> <span style="font-family: cursive;">409183</span>				
<b>Type of Letter Correspondence:</b> <span style="font-family: cursive;">DCTR, DCUS</span>				
<b>Letter Document Number(s):</b> <span style="font-family: cursive;">23425, 23426</span>				
<b>Certificate Number(s):</b> <span style="font-family: cursive;">—</span>				
Review and Approval	Initial and Date	Comments/Special Instructions		
Brandon Greulich, Work Lead EBTP	<span style="font-family: cursive;">BG 8/25/2014</span>			
Author/Creator Review	<span style="font-family: cursive;">MR 8/22/14</span>			
Peer Review Completed	<span style="font-family: cursive;">MM 8/22/14</span>	<span style="font-family: cursive;">UB 8/19/14</span>		
Author/Creator	<span style="font-family: cursive;">MR 8/18/14</span>		<b>Copies Made</b>	<b>Date</b>
			<span style="font-family: cursive;">MR</span>	<span style="font-family: cursive;">9/2/14</span>
			<b>Mailed</b>	<b>Date</b>
			<span style="font-family: cursive;">MR</span>	<span style="font-family: cursive;">9/2/14</span>
Please return <b>Routing Slip</b> and <b>Project Paperwork</b> to Brandon Greulich, MC-206, Ext. 4904				

D 2768  
 9/13/14 → 12/30/3000  
 C 9/13/14