

AIR DERC\_102041282-405989\_  
USE\_20110906\_Use\_D2794**07/28/2011 ----- EBTP IMS- PROJECT RECORD -----**PROJECT#: 405989      STATUS: P  
RECEIVED: 07/18/2011      PROJTYPE: BUSEDISP CODE: C  
ISSUED DT:  
SUP-DISP DATE: 9/6/2011STAFF ASSIGNED TO PROJECT:  
BANDA, DANIEL**PROJECT NOTES:**

USE: 1/1/2011-4/30/2011

NOTE THAT THE 30-DAY ROLLING AVERAGE SYSTEM CAP LIMIT (218.9 LBS NOX/DAY) ESTABLISHED BY §117.320, FOR THE 3RD QUARTER MONTHS (JULY, AUGUST, SEPTEMBER), IS THE SAME FOR THE 1ST, 2ND AND 4TH QUARTER MONTHS.

GROUPWISE DOCUMENTS: DCUS-17476 / DCTR-17477 / DCCT-17478

**PROJECT TRANSACTIONS****COMPANY DATA**COMPANY NAME: AIR PRODUCTS LLC  
CUSTOMER REGISTRY ID: CN602299257**PORTFOLIO DATA**

NUMBER: P0026 NAME: LA PORTE TEXAS FACILITY - RN102041282

**SITE DATA**ACCOUNT:  
HG0010N

REG ENTITY ID: RN102041282

SITE NAME: AIR PRODUCTS LA PORTE PLANT

COUNTY: HARRIS

NEAREST CITY: LA PORTE

LOCATION: 10202 STRANG RD, LA PORTE, TX

**CONTACT DATA**

NAME: PAUL MORRIS

TITLE: ENVIRONMENTAL ENGINEER

STREET: PO BOX 3326 CITY/STATE, ZIP: PASADENA, TX , 77501-0

PHONE: 713-920-7296 ext 0

FAX: 713-920-7445 ext 0

Email: morrispj@airproducts.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2011-07-19 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE:      EFFECTIVE YEAR:

TONS: 0      DOLLARS: 0

CERTIFICATE NO.: 0 COUNTY : HARRIS

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2011-07-19 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE

DELETED DATE:      EFFECTIVE YEAR:

TONS: 44.40      DOLLARS: 0

CERTIFICATE NO.: D2794 COUNTY : HARRIS

**TRACKING ACTIVITIES**TR - PROJ TECH  
COMPLETE :07/28/2011 TR - ENGINEER RECEIVE  
PROJECT :07/28/2011 TR - SUP/MANGR  
APP/RVW RQSTD : 8/4/2011

FA - PROJECT ISSUED :

TR - DATE SUP/MNGR  
REQ ADDL TR :

## DISCRETE EMISSION CREDITS INTENT TO USE TECHNICAL REVIEW

Project No.:	405989	Customer Reference No.:	CN602299257
Project Type:	BUSE	Regulated Entity No.:	RN102041282
Company:	Air Products, L.L.C.	Facility Name:	Air Products La Porte Plant
City:	La Porte	County:	Harris
Project Reviewer:	Mr. Daniel Banda	Portfolio Name:	P0026 - La Porte Texas Facility - RN102041282

### Project Overview

Air Products, LLC, submitted a Form DEC-3, "Notice of Use of Discrete Emission Credits", on July 18, 2011, for the purpose of complying with the 30-day rolling average nitrogen oxides (NO<sub>x</sub>) system cap under Title 30 Texas Administrative Code (TAC) §117.320 (previously 30 TAC §117.210), at the Air Products La Porte Plant. Air Products, LLC, set aside 44.4 tons (including the 10% environmental contribution of 3.9 tons and 5% compliance margin of 2.0 tons) of NO<sub>x</sub> Discrete Emission Reduction Credits (DERCs) from DERC Certificate D-2659 in the corresponding intent to use project number 405130. For the period of January 1, 2011, through April 30, 2011, Air Products, LLC, did not need to use any DERCs for the purposes of complying with the 30-day rolling average NO<sub>x</sub> system cap.

A total of 44.4 tons of NO<sub>x</sub> DERCs were set aside from DERC certificate D-2659. However, since no credits were needed for compliance purposes, the unused credits from DERC certificate D-2659 will be issued to DERC certificate D-2794 in the amount of 44.4 tons.

### Discrete Emission Credit Intent to Use

Certificate(s) to be used..... None  
Pollutant .....NO<sub>x</sub>  
Amount..... None  
Regulation .....30 TAC §117.320  
Use period/Use Date ..... 01/01/11 - 04/30/11


### Credit Use Calculation Methods

Air Products, LLC, did not exceed their 30-day rolling average NO<sub>x</sub> system cap. No DERCs were required.

### Conclusion

Air Products, LLC, submitted the required documentation for the purpose of compliance with 30 TAC §117.320. The unused credits from DERC certificate D-2659 will be issued to DERC certificate D-2794 in the amount of 44.4 tons.

 9/13/2011  
Project Reviewer Date

 9/6/2011  
Team Leader/Section Date  
Manager/Backup



Form DEC-3 (Page 1)  
No. 405989 of Use of Discrete Emission Credit  
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

Received

JUL 18 2011

DB

Air Quality Division

**I. COMPANY IDENTIFYING INFORMATION**

A. Company Name: Air Products LLC ✓

Mailing Address: 10202 Strang Road

City: La Porte

State: TX

Zip Code: 77571

Telephone: 281-478-5901

Fax:

B. TCEQ Customer Number (CN): CN602299257 ✓

C. Site Name: Air Products La Porte Facility

Street Address (If no street address, give driving directions to site) 10202 Strang Rd.

Nearest City: La Porte

Zip Code: 77571

County: Harris

D. TCEQ Regulated Entity Number (RN): RN102041282 ✓

E. TCEQ Air Account Number: (if applicable) HG-0010-N ✓

P0026

F. Primary SIC: 2813

Air Permit Number: 21878

**II. TECHNICAL CONTACT IDENTIFYING INFORMATION**

A. Technical Contact Name: ( ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr. ) : Paul J. Morris

Technical Contact Title: Senior Principal Environmental Engineer

Mailing Address: PO Box 3326

City: Pasadena

State: TX

Zip Code: 77501

Telephone: 713-920-7296

Fax: 713-920-7445

E-mail: morrispj@airproducts.com

**III. COMPANY CONTACT IDENTIFYING INFORMATION**

A. Company Contact Name: ( ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr. ) : David C. Hefe

Company Contact Title: West Gulf Coast Region Manager

Mailing Address: P.O. Box 3326

City: Pasadena

State: TX

Zip Code: 77501

Telephone: 713-920-7284

Fax: 281-478-3042

E-mail: hefeledc@airproducts.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: 01 / 01 / 2011

Use End Date: 04 / 30 / 2011



Form DEC-3 (Page 2)  
No.            of Use of Discrete Emission Credit             
(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 §117.310(a)(10)(A)

**VII. Most Stringent Emission Rate**

Describe basis for most stringent allowable emission rate:

☐ Permit : \_\_\_\_\_ ☒ RACT : 0.032 lb/MMBtu ☐ 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*

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)	
			See Attachment for calculations							
								<b>Total:</b>		



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 <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> : <u>0.0</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : <u>0.0</u>	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: _____

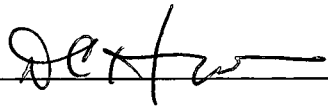
**XI. DERC INFORMATION**

Name of the DERC Generator: National Offsets  
DERC Generator Regulated Entity Number: P1149 Broker Account  
Certificate number of the DERCS acquired or to be acquired: D2135

*Note: The certificate number is assigned by the TCEQ*

**XII. CERTIFICATION BY RESPONSIBLE OFFICIAL**

I, David C. Hefe, 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: 7-15-11  
Title West Gulf Coast Region Manager

# Calculation of Discrete Emission Reduction Credits (DERCs)

Use Period Start: 1/1/2011

Use Period End: 4/30/2011

Date	MWhs Generation (MWhs)	Heat Input (MMBtu)	NO <sub>x</sub> Emissions (lbs/day)	Expected Emission Rate (lb/MMBtu)	Regulatory Limit System Cap per 117.320 (Lbs NO <sub>x</sub> /day)	Difference (lbs NO <sub>x</sub> )	DERCs (tons)	Environmental Contribution - 10% (tons)	Compliance Margin - 5% (tons)	Total DERCs Required (tons)

<b>Total for Use Period:</b>	0.0	0.0	0.0	0.0
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Heat Rate: 12,220 Btu/kwh

Calculation based upon the DERC calculation in 101.376(e)(2)

Dates only include days where emissions exceeded 30 day rolling average (218.9 lbs NO<sub>x</sub>/day)

MWhs Generation is total for all 4 emission units

Established system cap of 218.9 lbs Nox/day established per 117.320

Bryan W. Shaw, Ph.D., *Chairman*  
Buddy Garcia, *Commissioner*  
Carlos Rubinstein, *Commissioner*  
Mark R. Vickery, P.G., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

September 13, 2011

Mr. Paul J. Morris  
Senior Principal Environmental Engineer  
Air Products, LLC  
PO Box 3326  
Pasadena, Texas 77501

Re: Notice of Use of Discrete Emission Credits  
Air Products La Porte Plant  
La Porte, Harris County  
Regulated Entity Reference Number: RN102041282  
Customer Reference Number: CN602299257  
Portfolio Number: P0026

Dear Mr. Morris:

This letter is in response to a Form DEC-3 (Notice of Use of Discrete Emission Credits) received July 18, 2011, regarding the use of nitrogen oxides (NO<sub>x</sub>) Discrete Emission Reduction Credits (DERCs) for the purpose of complying with the 30-day rolling average NO<sub>x</sub> system cap under 30 Texas Administrative Code (TAC) §117.320 for the period of January 1, 2011, through April 30, 2011.

We have reviewed your application and understand that no NO<sub>x</sub> DERCs were needed for the period of January 1, 2011, through April 30, 2011. Enclosed is a copy of DERC certificate D-2794 issued to Air Products, LLC, for the amount of 44.4 tons of NO<sub>x</sub> DERCs retained from DERC certificate D-2659. DERC certificate D-2794 has been completely used to satisfy the intent to use for the period of May 1, 2011, through August 31, 2011. DERC certificate D-2659 has been cancelled and is no longer available for use.

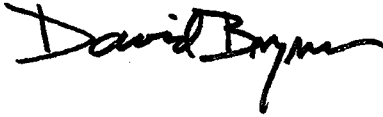
Thank you for your cooperation in this matter. If you have questions concerning this review, please contact Mr. Daniel Banda at (512) 239-4701 or write to the Texas Commission on Environmental Quality, Chief Engineer's Office, Air Quality Division (MC-206), PO Box 13087, Austin, Texas 78711-3087.



Mr. Paul J. Morris  
Page 2  
September 13, 2011

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

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/DB/ig

cc: Air Section Manager, Region 12 – Houston  
Mr. Michael Schaffer, Director, Environmental Public Health Division, Harris County Public  
Health and Environmental Services, Pasadena  
Mr. David C. Hefe, West Gulf Coast Region Manager, Air Products, LLC, Pasadena

Project Number: 405989

closed early for  
405590  
86

# Banking and Trading Route Slip

**Company:**

Air Products, LLC  
- La Porte Plant

**Project  
Number:**

405989

**Type of Letter  
Correspondence:**

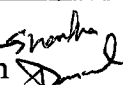
PENS DCTR DCT

**Letter Doc No:**

17476 17477 17478

**Certificate No:**

D-2794

	Initials:	Date
Author/Creator	DB	7/28
Peer Review Completed	DM	8/3
Author/Creator Review	DB	8/4
<b>Review and Approval By:</b>	<b>Initials:</b>	<b>Date</b>
WL Review: <del>Brandon Greulich</del> <sup>Shanika</sup> 	BB	9/6
Management Review: Chance Goodin	BB for LG	edits 9/6
Copies made	DB	9/13
Mailed	DB	9/13

## Comments/Special Instructions

Close before 405590 b Done

-Daniel-

Please return **Routing Slip and Project Paperwork**  
to Brandon Greulich, MC-206, Ext. 4904