

AIR DERC\_100210350-409456\_  
USE\_20141223\_Use\_D3075

**01/27/2015 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 409456      STATUS: P      DISP CODE: C ✓  
RECEIVED: 11/12/2014      PROJTYPE: BDIU      ISSUED DT:  
SUP-DISP DATE: 12/23/14

**STAFF ASSIGNED TO PROJECT:**  
MUSA, JOSEPH

**PROJECT NOTES:**  
USE PERIOD 01/01/2015 - 12/31/2015.

**PROJECT TRANSACTIONS**

**COMPANY DATA**

COMPANY NAME: HUNTSMAN INTERNATIONAL LLC  
CUSTOMER REGISTRY ID: CN600710875

**PORTFOLIO DATA**

NUMBER: P3655 NAME: HUNTSMAN - RN100210350

**SITE DATA**

ACCOUNT: HG0133T  
REG ENTITY ID: RN100210350  
SITE NAME: HUNTSMAN  
COUNTY: HARRIS      NEAREST CITY: HOUSTON  
LOCATION: 101 CONCRETE STREET HOUSTON, TEXAS  
77012

**CONTACT DATA**

NAME: ANDREW ADAMS      TITLE: SENIOR MANUFACTURING MANAGER  
STREET: 101 CONCRETE STREET CITY/STATE, ZIP: HOUSTON, TX , 77012-0  
PHONE: 713-924-6400 ext 0  
FAX: 713-924-6418 ext 0  
Email: andy\_adams@huntsmann.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_INTEN  
DATE ENTERED: 2014-11-12 00:00:00.0      DELETED DATE:      EFFECTIVE YEAR: **D3075**  
CONTAMINATE: NOX      TONS: 1.40      DOLLARS: 0  
ALLOWANCE0      CERTIFICATE NO.: **D3075** COUNTY : HARRIS

**COMPANY DATA**

COMPANY NAME: HUNTSMAN INTERNATIONAL LLC  
CUSTOMER REGISTRY ID: CN600710875

**PORTFOLIO DATA**

NUMBER: P3655 NAME: HUNTSMAN - RN100210350

**SITE DATA**

ACCOUNT: HG0133T  
REG ENTITY ID: RN100210350  
SITE NAME: HUNTSMAN  
COUNTY: HARRIS  
LOCATION: 101 CONCRETE STREET HOUSTON, TEXAS  
77012

NEAREST CITY: HOUSTON

**CONTACT DATA**

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_INTEN  
DATE ENTERED: 2014-12-22 00:00:00.0  
CONTAMINATE: NOX  
ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:  
TONS: 0.60 DOLLARS: 0  
CERTIFICATE NO.: D3077 COUNTY : HARRIS

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET  
DATE ENTERED: 2014-12-22 00:00:00.0  
CONTAMINATE: NOX  
ALLOWANCE0

DELETED DATE: EFFECTIVE YEAR:  
TONS: 0.60 DOLLARS: 0  
CERTIFICATE NO.: D3151 COUNTY : HARRIS

---

**TRACKING ACTIVITES**

PROJECT SUBMITTED : 10/27/2014 PM RECEIVED DATE : 11/13/2014 PROJECT COMPLETED :

## DISCRETE EMISSION CREDIT INTENT TO USE TECHNICAL REVIEW

Project No.:	409456	Customer Reference No.:	CN600710875
Project Type:	BDIU	Regulated Entity Reference No.:	RN100210350
Company:	Huntsman International, LLC	Facility Name:	Huntsman
City:	Houston	County:	Harris
Project Reviewer:	Mr. Joseph Musa	Portfolio Number:	P3655

### Project Overview

Huntsman International, LLC (Huntsman), submitted a Notice of Intent to Use Discrete Emission Credits (Form DEC-2) received November 12, 2014. Huntsman intends to use nitrogen oxides (NO<sub>x</sub>) discrete emission reduction credits (DERC) in complying with the requirements of 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A) on a boiler, facility identification number BOIL, at the Huntsman site. The use period is January 1, 2015 through December 31, 2015.

Huntsman requested that 1.9 tons (including the required 10% environmental contribution of 0.2 ton) of NO<sub>x</sub> DERCS be set aside to cover potential excess emissions from the boiler. A total amount of 2.0 tons will set aside from certificates D-3075 and D-3077. Since certificate D-3077 is not completely set aside, the retained amount of 0.6 ton will be issued back to the company on certificate D-3151.

### Discrete Emission Credit Use

The boiler is subject to the emission specification for attainment demonstration (ESAD) in §117.2010(c)(1)(A). The ESAD for the unit is 0.036 pounds of NO<sub>x</sub> per million British thermal units (lb/MMBtu), while its actual emission rate is 0.115 lb/MMBtu. The emission rate was determined from a stack test that was conducted on the unit on February 14, 2012. A stack test summary was submitted as supporting documentation. Since the stack test emission rate exceeds the ESAD value, Huntsman intends to use DERCS to cover the excess emissions.

Certificates used.....D-3075, D-3077  
 Pollutant..... NO<sub>x</sub>  
 Amount.....2.0 tons  
 Regulation.....§117.2010(c)(1)(A)  
 Intent to Use Period.....01/01/2015 – 12/31/2015

### Discrete Emission Credit Use Calculation Method

In determining the amount of discrete emission credits (DEC) needed, Huntsman assumed the unit would be continuously operating, at the rated capacity of 5.0 MMBtu per hour (MMBtu/hr), throughout the year. Thus, the expected level of activity would be 5.0 MMBtu/hr x 8,760 hr = 43,800 MMBtu. Per 30 TAC §101.376(d)(2)(B):

$$\text{DECs needed} = (\text{ELA}) \times (\text{EER} - \text{RER})$$

Where:

- ELA = expected level of activity
- EER = expected emission rate per unit activity
- RER = regulatory emission rate per unit activity

DISCRETE EMISSION CREDIT INTENT TO USE TECHNICAL REVIEW

Page 2

Project Number: 409456

DECs needed =  $[(43,800 \text{ MMBtu} \times (0.115 \text{ lb/MMBtu} - 0.036 \text{ lb/MMBtu})) \div 2000 \text{ lb/ton}]$

DECs needed = 1.73 tons; rounded up to the nearest tenth of a ton = 1.8 tons

10% environmental contribution = 0.18 ton; rounded up to the nearest tenth of a ton = 0.2 ton

Total DECs needed = 1.8 tons + 0.2 ton = 2.0 tons

**Conclusion**

Huntsman has a sufficient amount of DERCs needed to be in compliance with §117.2010(c)(1)(A) during the intended use period of January 1, 2015 through December 31, 2015. Certificate D-3075 will be completely set aside for this intent. New certificate D-3151 for 0.6 ton remaining from certificate D-3077 will be issued to Huntsman for future use.

Joseph Musa                      12/23/14  
Project Manager                      Date

[Signature]                      12/29/14  
Peer Reviewer                      Date

Braulio                      1/27/2015  
Work Lead                      Date



<b>I. Company Identifying Information</b>			
A. Company Name: <b>Huntsman International, LLC</b> ✓			
Mailing Address: <b>101 Concrete Street</b>			
City: <b>Houston</b>	State: <b>Texas</b>	Zip Code: <b>77012</b>	
Telephone: <b>713-924-6400</b>		Fax: <b>713-924-6418</b>	
B. TCEQ Customer Number (CN): <b>600710875</b> ✓			
C. Site Name: <b>Houston Port Location</b>			
Street Address (If no street address, give driving directions to site) <b>101 Concrete Street</b>			
Nearest City: <b>Houston</b>	Zip Code: <b>77012</b>	County: <b>Harris</b>	
D. TCEQ Regulated Entity Number (RN): <b>100210350</b> ✓			
E. TCEQ Air Account Number: (if applicable) <b>HG-0133-T</b> ✓			<b>P3655</b>
F. Primary SIC: <b>2899</b>		Air Permit Number: <b>PBR</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>Colt Sommers</b>			
Technical Contact Title: <b>Account Manager – Technical Services</b>			
Mailing Address: <b>16225 Park Ten Place Suite 110</b>			
City: <b>Houston</b>	State: <b>Texas</b>	Zip Code: <b>77084</b>	
Telephone: <b>281-945-1922</b>	Fax: <b>281-945-1923</b>	E-mail: <b>colt.sommers@acsengineer.com</b>	
<b>III. Company Contact Identifying Information (If different from Technical Contact)</b>			
A. Company Contact Name: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : <b>Andrew J. Adams</b>			
Company Contact Title: <b>Sr. Manufacturing Manager</b>			
Mailing Address: <b>101 Concrete street</b>			
City: <b>Houston</b>	State: <b>Texas</b>	Zip Code: <b>77012-2443</b>	
Telephone: <b>713-924-6400</b>	Fax: <b>713-924-6418</b>	E-mail: <b>andy_adams@huntsman.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 type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
Year DERC Generated: _____ Year of Use: _____ Ratio of DERC to Allowance: _____ to _____			
<i>Note: If DERC use is to comply with MECT then go to Section IX</i>			
<b>V. Intended Use Period</b>			
Intended Use Start Date: <b>01 / 01 / 2015</b>		Intended Use End Date: <b>12 / 31 / 2015</b>	



Form DEC-2 (Page 2)  
Notice of Intent to Use 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:

30 TAC 117.210(c) (1)(A)

**VII. Most Stringent Emission Rate**

Describe basis for most stringent allowable emission rate:

Permit \_\_\_\_\_  RACT 0.036 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 IX (next page)



Form DEC-2 (Page 3)  
 Notice of Intent to Use Discrete Emission Credits  
 (Title 30 Texas Administrative Code § 101.370 - § 101.379)

IX. Tons of DERCS Required									
Emission Point No.	FIN	Air Contaminant	Calculation of DERCS						
			Expected Activity (units)	Expected Emission Rate (units)	Expected Total Emissions (tons)	Regulated Activity (units)	Regulated Emission Rate (units)	Regulated Total Emissions (tons)	DERCS (tons)
STKBOIL	BOIL	NOx	8,760,000(hrs) 43,800 MMBtu	0.115 lb/MMBtu	2.519	8,760,000(hrs) 43,800 MMBtu	0.036 (lb/MMBtu)	0.788	1.730
Total:								1.8	1.730

TCEQ 10392 (Revised 12/07) Form DEC-2  
 This form is for use by facilities subject to air quality permit requirements and may be revised periodically.



**Form DEC-2 (Page 4)**  
**Notice of Intent to Use Discrete Emission Credits**  
**(Title 30 Texas Administrative Code § 101.370 - § 101.379)**


<b>X. Total DERCS Required for Use (round up to the nearest tenth of a ton)</b>					
Tons of DERCS required (from Sect. VII.)	CO: _____	NO <sub>x</sub> : <u>1.8</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : <u>N/A</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : <u>0.2</u> ✓	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Compliance Margin (+ 5%) (If DERCS use requires >10 tons)	CO: _____	NO <sub>x</sub> : <u>N/A</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
<b>Total DERCS</b>	CO: _____	NO <sub>x</sub> : <u>2.0</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____

**XI. DERC Information**

Name of the DERC Generator: \_\_\_\_\_  
 DERC Generator Regulated Entity Number: N/A  
 Certificate number of the DERCS acquired or to be acquired: N/A D-3077  
 Date on which the DERCS were acquired or will be acquired: D-2965 and D-2999  
*Note: The certificate number is assigned by the TCEQ* D-3076

**XII. Certification by Responsible Official**

I, Andrew J. Adams, 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  Signature Date 10-8-14  
 Title Sr. Manufacturing Manager

<b>Company Name</b>	Huntsman International LLC
<b>TCEQ Customer Number</b>	CN600710875
<b>Site Name</b>	Polyester Polyol Production Operation
<b>TCEQ Regulated Entity Number</b>	RN100210350
<b>TCEQ Air Account Number</b>	HG-0133-T
<b>Primary SIC</b>	2899
<b>Air Permit Number</b>	77373

<b>Unit</b>	Boiler
<b>EPN</b>	STKBOIL
<b>FIN</b>	BOIL
<b>Air Containment</b>	NOx
<b>Expected Activity (EA) (hrs)</b>	8,760.000
<b>Maximum Heat Input (MHI) (MMBtu/hr)</b>	5.000
<b>Expected Emission Rate (EER) (lb/MMBtu)*</b>	0.115
<b>Expected Total Emissions (ETE) (tons)</b>	2.519
<b>Regulated Activity (RA) (hrs)</b>	8,760.000
<b>Regulated Emission Rate (RER) (lb/MMBtu)</b>	0.036
<b>Regulated Total Emissions (RTE) (tons)</b>	0.788
<b>DERCs (tons)</b>	1.730

\* Stack test data dated 02/14/2012

Calculations:

$$ETE = EER \times MHI \times EA = 0.115 \text{ (lb/MMBtu)} \times \overbrace{5.0 \text{ (MMBtu/hr)} \times 8760 \text{ (hrs)}}^{43,800 \text{ MMBtu}} = 2.519 \text{ (tons)}$$

$$RTE = RER \times MHI \times RA = 0.036 \text{ (lb/MMBtu)} \times 5.0 \text{ (MMBtu/hr)} \times 8760 \text{ (hrs)} = 0.788 \text{ (tons)}$$

$$DERCs \text{ Needed} = ETE - RTE = 2.519 \text{ (tons)} - 0.788 \text{ (tons)} = 1.730 \text{ (tons)}$$

*1.8*

Total: 1.7 tons (nearest tenth of a ton) *0.18*  
 10% environmental contribution = ~~0.17~~ tons  
 (nearest tenth) = 0.2 tons  
 Total DERCs Needed = (*1.8* + 0.2) tons = *2.0* tons

# **ENTECH ENGINEERING INC.**

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

**Table 1.  
Oxid, L.P.  
Houston Plant  
Houston, Harris County, Texas  
Boiler (EPN STKBOIL)  
Initial Demonstration of Compliance Test Summary  
(TCEQ Account ID No. HG-0133-T; Permit-by-Rule)  
Test Date: February 14, 2012**

Pollutant	Pollutant Concentration (ppmv) @ 3% O <sub>2</sub>	Pollutant Concentration (lb/MMBtu)	Allowable Pollutant Concentration (ppmv) @ 3% O <sub>2</sub>	Allowable Pollutant Concentration (lb/MMBtu)	Allowable Limit Exceeded (Yes/No)
NO <sub>x</sub>	95.32	0.115	*	*	*
CO	20.17	0.015	400	-	No

\*Emission limits will be determined under the Cap and Trade Program.

**ENTECH ENGINEERING INC.**

P. O. Box 890746 . Houston, Texas 77289-0746 . (281)332-3118

**Table 2**

**NOx/CO/O2 Initial Demonstration of Compliance**

**Test Summary**

**Boiler**

**Oxid, LP - Houston Plant**

**Houston, Harris County, TX**

**TCEQ Account ID No. HG-0133-T; Permit No.**

Fuel Flow (dscf/hr)	145.6	146.2	145.2	145.7
Fd Factor (dscf/MMBtu)	8645.18	8645.18	8645.18	8645.18
Firing Rate (MMbtu/hr)	0.15	0.15	0.15	0.15

Test Run	1	2	3	Average
Test Date	02/14/12	02/14/12	02/14/12	NA
Test Time	9:49-10:48	11:05-12:04	12:28-13:27	NA
Excess Oxygen (%)	3.34	4.3	3.967	3.87

CO, ppmv	19.18	19.18	19.18	19.18
CO, ppmv @ 3% O <sub>2</sub>	19.55	20.68	20.28	20.17
CO, lb/MMBtu	0.014	0.015	0.015	0.015

NOx, ppmv	98.02	88.15	86.09	90.75
NOx, ppmv @ 3% O <sub>2</sub>	99.91	95.05	91.01	95.32
NOx, lb/MMBtu	0.120	0.115	0.110	0.115

Shaded cells use Minimum Detection Limit (MDL), 2% of calibration span (for CO, 19.18 ppmv)

**ENTECH ENGINEERING INC.**

P.O. Box 890746 Houston, Texas 77289-0746 Ph. (281) 332-3118

**Table 2  
Oxid L.P., Houston Plant  
Houston, Harris County, Texas  
Hot Oil Furnace Initial Demonstration of Compliance Test  
TCEQ Account ID No. HG-0133-T**

Source ID	Date	Time	Run	Unit Firing Rate HHV (MMBtu/hr)	Fd Factor (dscf/MMBtu)	Excess Oxygen (O <sub>2</sub> ) (% by vol., dry)	Pollutants							
							Nitrogen Oxides (NO <sub>x</sub> )				Carbon Monoxide (CO)*			
							Concentration (ppmvd)	Corr. to 3% O <sub>2</sub> (ppmvd)	Emission Rates		Concentration (ppmvd)	Corr. to 3% O <sub>2</sub> (ppmvd)	Emission Rates	
									(lb/MMBtu)	(lb/hr)			(lb/MMBtu)	(lb/hr)
Steam Boiler (EPN STKHOFURN)	03/03/05	12:31-13:31	1	4.39	8710	2.27	65.1	62.5	0.076	0.33	<1.0	<0.961	<0.001	0.00
	03/03/05	13:52-14:52	2	4.38	8710	3.71	65.8	68.5	0.083	0.36	<1.0	<1.041	<0.001	0.00
	03/03/05	15:08-16:08	3	4.27	8710	4.06	66.1	70.3	0.085	0.36	<1.0	<1.063	<0.001	0.00
			Average	4.35	8710	3.35	65.7	67.1	0.081	0.35	<1.0	<1.021	<0.001	0.00

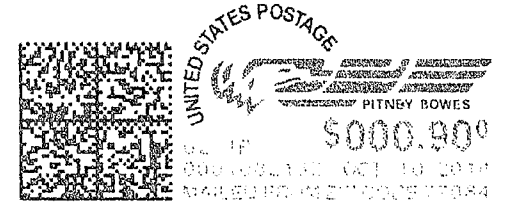
\* The minimum detection limit of 1 ppmv was used for determining CO emission rates.

# URGENT

Compliance made simple since 1993

Mark Ten Place, Suite 110  
Austin, Texas 77084

3



RECEIVED  
NOV 12 2014  
TCEQ MAIL CENTER  
CJ

TCEQ  
Emissions Banking and Trading  
MC-206  
P.O. Box 13087  
Austin, TX 78711-3087



16225 Park Ten Place, Suite 110

Houston, TX 77084

t.281.945.1922



October 9, 2014

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
Emissions Banking and Trading  
TCEQ MC -206  
P.O. Box 13087  
Austin, Texas 78711-3087

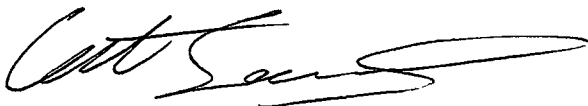
Subject: Notice of Intent to Use DERs (Form DEC-2)  
Huntsman International, LLC  
101 Concrete Street, Houston, Harris County  
HG-0133-T; RN100210350

Dear Sir or Madame:

On behalf of Huntsman International, LLC (Huntsman), and Pursuant to 30 TAC 117.9800(a), ACS Engineering hereby submits the Notice of Intent to Use Discrete Emission Reduction Credits (Form DEC-2) in accordance with 30 TAC 101.376 to comply with the emission control requirements of 30 TAC 117.2010(b) and (c)(1)(A). The completed DEC-2 Form is enclosed for the above referenced facility covering the compliance period from 01/01/2015 through 12/31/2015.

Please do not hesitate to contact me at (281) 945-1903 if you have any questions or require further information regarding this matter.

Sincerely,



Colt Sommers  
Account Manager – Technical Services

## Joseph Musa

---

**From:** Colt Sommers <colt.sommers@acsengineering.com>  
**Sent:** Monday, December 22, 2014 10:06 AM  
**To:** Joseph Musa  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits

OK, I think we just confused the certificates. D-3075 and D-3077 would cover the needs for 2015 correct?

**Colt Sommers**   
Account Manager – Technical Services



**ACS ENGINEERING**

[www.acsengineering.com](http://www.acsengineering.com)

[colt.sommers@acsengineering.com](mailto:colt.sommers@acsengineering.com)

Office: (281) 945-1903

Fax: (281) 945-1923

ACS Engineering

16225 Park Ten Place, Suite 110

Houston, TX 77084

---

**From:** Joseph Musa [<mailto:joseph.musa@tceq.texas.gov>]  
**Sent:** Monday, December 22, 2014 10:03 AM  
**To:** Colt Sommers  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits

Mr. Sommers:

I attached a copy of the letter that was mailed to Mr. Andrew Adams on January 17, 2014. According to the letter, the use of certificates D-3074 and D-3076 is restricted to the intended use period January 1, 2014 through December 31, 2014. That is, both certificates cannot be set aside now for the intended use period January 1, 2015 through December 31, 2015. The only certificates available for 2015 are D-3075 and D-3077, valued at 1.4 tons and 1.2 tons, respectively.

Joseph Musa

---

**From:** Colt Sommers [<mailto:colt.sommers@acsengineering.com>]  
**Sent:** Friday, December 19, 2014 11:54 AM  
**To:** Joseph Musa  
**Subject:** FW: Notice of Intent to Use Discrete Emission Credits

Joseph,

My understanding is that these credits were available for this facility. I have no knowledge of them being set aside for another "intent project". Would you please elaborate on what that means and what the process is for using the available credits is? I appreciate your direction.

Sincerely,

**Colt Sommers**   
Account Manager – Technical Services

  
**ACS ENGINEERING**

[www.acsengineering.com](http://www.acsengineering.com)

[colt.sommers@acsengineering.com](mailto:colt.sommers@acsengineering.com)

Office: (281) 945-1903

Fax: (281) 945-1923

ACS Engineering

16225 Park Ten Place, Suite 110

Houston, TX 77084

---

**From:** jmusa [<mailto:joseph.musa@tceq.texas.gov>]

**Sent:** Monday, December 15, 2014 5:31 PM

**To:** Colt Sommers

**Subject:** Notice of Intent to Use Discrete Emission Credits

Mr. Sommers:

This e-mail is in response to a Notice of Intent to Use Discrete Emission Credits (Form DEC-1) received from Huntsman International, LLC, on November 12, 2014. Certificate D-2965 (re-numbered as D-3076) is not available since it was set aside for another intent project. Please let me know by e-mail if you would like to set aside certificate D-3075, valued at 1.4 tons, or another certificate.

If you have any questions, please contact me by e-mail or at (512) 239-3328.

Joseph Musa  
Air Quality Division  
Texas Commission on Environmental Quality  
Phone: (512) 239-3328  
Fax: (512) 239-6188

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*

January 28, 2015

Mr. Andrew J. Adams  
Senior Manufacturing Manager  
Huntsman International, LLC  
101 Concrete Street  
Houston, Texas 77012-2443

Re: Notice of Intent to Use Discrete Emission Credits  
Huntsman  
Houston, Harris County  
Regulated Entity Reference Number: RN100210350  
Customer Reference Number: CN600710875  
Portfolio Number: P3655

Dear Mr. Adams:

This letter is in response to Huntsman International, LLC's Notice of Intent to Use Discrete Emission Credits (Form DEC-2) received on November 12, 2014. We understand that Huntsman International, LLC intends to use 1.9 tons (including the 10% environmental contribution of 0.2 ton) of nitrogen oxides (NO<sub>x</sub>) discrete emission reduction credits (DERC) for the purpose of compliance with 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A) for the period of January 1, 2015 through December 31, 2015. The reported value of 1.9 tons was revised to 2.0 tons since the required amount of DERCs (1.73 tons) was not rounded up to the nearest tenth of a ton.

Upon review of the form and supporting documentation, we have determined that the notice and the credits to be used meet the requirements of 30 TAC §§101.370 through 101.379 for compliance with §117.2010(c)(1)(A). A total amount of 2.0 tons of NO<sub>x</sub> DERCs from certificates D-3075 and D-3077 has been set aside for this intent, with the remaining 0.6 ton of NO<sub>x</sub> from certificate D-3077 retained on certificate D-3151.

Enclosed is a copy of certificate D-3151 issued to Huntsman International, LLC, in the amount of 0.6 ton of NO<sub>x</sub> DERCs. This certificate has been deposited in the Texas Commission on Environmental Quality (TCEQ) Discrete Emission Credit Registry. The certificate may be transferred or sold to another owner for use per the requirements of §§101.370 through 101.379

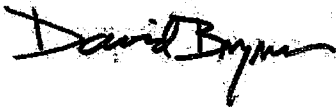
A Notice of Use of Discrete Emission Credits (Form DEC-3) must be submitted within 90 days of the end of the use period.

Mr. Andrew J. Adams  
Page 2  
January 28, 2015

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 Mr. Joseph Musa at (512) 239-3328 or write to the Texas Commission on Environmental Quality, Office of Air, Air Quality Division (MC-206), PO Box 13087, Austin, Texas 78711-3087.

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

Sincerely,



David Brymer, Director  
Air Quality Division

DB/JM/ig

cc: Air Section Manager, Region 12 – Houston  
Mr. Bob Allen, Director, Harris County Pollution Control Services Department, Harris County  
Mr. Arturo J. Blanco, Bureau Chief of Air Quality Control, Health and Human Services Department, City of Houston, Houston  
Mr. Colt Sommers, Account Manager – Technical Services, ACS Engineering, Houston

Project Number: 409456

## Banking and Trading Route Slip

AIR QUALITY DIVISION Emissions Banking and Trading Program (EBTP)			
Company Name: <i>Huntsman International, LLC</i>			
Project Number: <i>409456</i>			
Type of Letter Correspondence: <i>DCTR, DCUA, DCT</i>			
Letter Document Number(s): <i>24320, 24321, 24322</i>			
Certificate Number(s): <i>D-3151, D-3075, D-3077</i>			
Review and Approval	Initial and Date	Comments/Special Instructions	
Brandon Greulich, Work Lead EBTP	<i>BG 1/23/15</i>	<i>update #'s</i>	
Author/Creator Review	<i>JM 1/27/15</i>		
Peer Review Completed	<i>JMG 12/24/14</i>		
Author/Creator	<i>JM 12/23/14</i>	<b>Copies Made</b>	<b>Date</b>
		<i>JM</i>	<i>1/27/15</i>
		<b>Mailed</b>	<b>Date</b>
		<i>JM</i>	<i>1/28/15</i>
Please return <b>Routing Slip</b> and <b>Project Paperwork</b> to Brandon Greulich, MC-206, Ext. 4904			

C 1/29/15