

AIR DERC\_100223205-408399\_  
USE\_20131001\_Use\_D2548

**10/01/2013 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 408399      STATUS: P      DISP CODE: C ✓  
RECEIVED: 09/23/2013      PROJTYPE: BDIU      ISSUED DT:  
SUP-DISP DATE: 10/1/13

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

**PROJECT NOTES:**

THE COMPANY INTENDS TO USE 477.0 TONS OF NOX DERCS TO COMPLY WITH THE MECT 2013 CONTROL PERIOD. THIS AMOUNT DOES NOT NEED TO BE REDUCED, PER §101.356(H)(10)(B), BECAUSE THE TOTAL REQUESTED AMOUNT FOR 2013 WAS 3,878 (I.E., LESS THAN 10,000)

**PROJECT TRANSACTIONS**

**COMPANY DATA**

COMPANY NAME: ROHM AND HAAS TEXAS INCORPORATED  
CUSTOMER REGISTRY ID: CN600131395

**PORTFOLIO DATA**

NUMBER: P0607 NAME: ROHM AND HAAS TEXAS DEER PARK - RN100223205

**SITE DATA**

ACCOUNT: HG0632T  
REG ENTITY ID: RN100223205  
SITE NAME: ROHM AND HAAS TEXAS DEER PARK PLANT  
COUNTY: HARRIS      NEAREST CITY: DEER PARK  
LOCATION: 1900 TIDAL ROAD, DEER PARK, TEXAS 77536

D 2548

**CONTACT DATA**

NAME: PRENTICE C. JAMES      TITLE: EH&S SPECIALIST  
STREET: 2301 N BRAZOSPORT BOULEVARD B 101 CITY/STATE, ZIP: FREEPORT, TX , 77541-3257  
PHONE: 979-238-0317 ext 0  
Email: pcjames@dow.com

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_INTEN  
DATE ENTERED: 2013-09-26 00:00:00.0      DELETED DATE:      EFFECTIVE YEAR: 2013  
CONTAMINATE: NOX      TONS: 477.00      DOLLARS: 0  
ALLOWANCE1      CERTIFICATE NO.: D2548 COUNTY : HARRIS

**TRACKING ACTIVITES**

PM RECEIVED DATE :      10/01/2013 LETTER ISSUED :

**DISCRETE EMISSION CREDITS USE TECHNICAL REVIEW**

|                  |                                  |                         |                                     |
|------------------|----------------------------------|-------------------------|-------------------------------------|
| Project No.:     | 408399                           | Customer Reference No.: | CN600131395                         |
| Project Type:    | BDIU                             | Regulated Entity No.:   | RN100223205                         |
| Company:         | Rohm and Haas Texas Incorporated | Facility Name:          | Rohm and Haas Texas Deer Park Plant |
| City:            | Deer Park                        | County:                 | Harris                              |
| Project Manager: | Mr. Joseph Thomas                | Portfolio Name:         | Po607                               |

**Project Overview**

Rohm and Haas Texas Incorporated submitted a Form DEC-2 (Notice of Intent to Use Discrete Emission Credits) received September 23, 2013 for compliance with the Mass Emissions Cap and Trade (MECT) Program at the Rohm and Haas Texas Deer Park Plant. The company intends to use nitrogen oxides (NO<sub>x</sub>) Discrete Emission Reduction Credits (DERC) to supplement their MECT allowances for the plant during the period of January 1, 2013 to December 31, 2013.

As in previous years, Rohm and Haas Texas Incorporated has estimated that an additional 47.7 tons of MECT allowances may be needed for compliance with 30 Texas Administrative Code §101.352(b) by the plant in the 2013 control period. Because the DERCs owned by Rohm and Haas Texas Incorporated were generated in 1994, there is a ratio of 10:1 for using the DERCs in place of MECT allowances for the 2013 control period. Rohm and Haas Texas Incorporated has requested 477.0 tons of NO<sub>x</sub> DERCs be set aside for compliance. The 477.0 tons of NO<sub>x</sub> DERCs needed are available and will be set aside from DERC certificate D-2548.

**Discrete Emission Credit Intent to Use**

Rohm and Haas Texas Incorporated requested to set aside 477.0 tons of NO<sub>x</sub> DERCs from Certificate D-2548 to supplement the MECT allowances for the Rohm and Haas Texas Deer Park Plant with an additional 47.7 tons of MECT allowances. The DERCs were originally generated prior to 1999 (from controls on two gas turbines that exceeded regulatory requirements) in Certificate D-1007 and therefore must be used with a 10:1 ratio of DERCs to MECT allowances per §101.356(h)(5). Per §101.356(h)(8), no environmental contribution or compliance margin is required for this use of DERCs. Because Certificate D-2548 is completely set aside, there are no NO<sub>x</sub> DERCs to be returned to the company at this time.

|                                  |                      |
|----------------------------------|----------------------|
| Certificate to be set aside..... | D-2548               |
| Pollutant.....                   | NO <sub>x</sub>      |
| Amount.....                      | 477.0 tons           |
| Regulation.....                  | §101.356(h)(5)       |
| Use period/Use Date.....         | 1/1/2013– 12/31/2013 |

**Discrete Emission Credit Use Calculation Method**

MECT Program Allowances Needed = 47.7 tons of NO<sub>x</sub>  
 DERC to Allowance Ratio specified in §101.356(h)(5) = 10 : 1  
 DERCs to be reserved = (10)(47.7) = 477.0 tons of NO<sub>x</sub> DERCs to be set aside from D-2548

**Conclusion**

Rohm and Haas Texas Incorporated has requested that 477.0 tons of DERCS be set aside under 30 TAC §101.356(h) to supplement the MECT allowances for the Rohm and Haas Texas Deer Park Plant by 47.7 tons during the 2013 control period (January 1, 2013 through December 31, 2013). The 477.0 tons of NO<sub>x</sub> DERCS are set aside from Certificate D-2548.

Joseph H. Stum      10/1/2013  
Project Manager      Date

Joseph Musa      10/2/13  
Peer Reviewer      Date

Brad A      10/3/13  
Work Lead      Date



**Form DEC-2 (Page 1)**  
**Notice of Intent to Use Discrete Emission Credits**  
 (Title 30 Texas Administrative Code § 101.370 - § 101.379)

JT

Air Quality Division

408399 NOx

|  |                          |                                |  |
|--|--------------------------|--------------------------------|--|
| <b>I. Company Identifying Information</b>  |                          |                                |  |
| A. Company Name: <b>Rohm and Haas Company</b> - <i>TEXAS INCORPORATED</i>  |                          |                                |  |
| Mailing Address: <b>1900 Tidal Road</b>  |                          |                                |  |
| City: <b>Deer Park</b>   | State: <b>TX</b>         | Zip Code: <b>77536</b>         |  |
| Telephone: <b>979-238-1443</b>   |                          | Fax: <b>979-238-0317</b>       |  |
| B. TCEQ Customer Number (CN): <b>CN600131395</b> ✓   |                          |                                |  |
| C. Site Name: <b>Rohm and Haas Texas Inc. Deer Park Plant</b>  |                          |                                |  |
| Street Address: <b>1900 Tidal Road</b>   |                          |                                |  |
| Nearest City: <b>Deer Park</b>   | Zip Code: <b>77536</b>   | County: <b>Harris</b>          |  |
| D. TCEQ Regulated Entity Number (RN): <b>RN100223205</b> ✓   |                          |                                |  |
| E. TCEQ Account Number (if applicable): <b>HG-0632-T</b> ✓ <span style="float: right;"><i>P0607</i></span>   |                          |                                |  |
| F. Primary SIC:  |                          | Air Permit Number:             |  |
| <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 Specialist</b>   |                          |                                |  |
| Mailing Address: <b>2301 N. Brazosport Blvd., Bldg., 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 (If different from Technical Contact)</b>  |                          |                                |  |
| A. Company Contact Name: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) :                                       |                          |                                |  |
| Company Contact Title:   |                          |                                |  |
| Mailing Address:   |                          |                                |  |
| City:  | State:                   | Zip Code:                      |  |
| Telephone:   | Fax:                     | E-mail:                        |  |
| <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 type="checkbox"/> NO  |                          |                                |  |
| Year DERC Generated: <u>1998</u> Year of Use: <u>2013 MECT</u> Ratio of DERC to Allowance: <u>10</u> to <u>1</u>   |                          |                                |  |
| <i>Note: If DERC use is to comply with MECT then go to Section IX</i>  |                          |                                |  |



**Form DEC-2 (Page 1)**  
**Notice of Intent to Use Discrete Emission Credits**  
**(Title 30 Texas Administrative Code § 101.370 - § 101.379)**

**V. Intended Use Period**

Intended Use Start Date: 01 / 01 / 2013

Intended Use End Date: 12 / 31 / 2013

**VI. State and Federal Requirements**

Applicable State and Federal requirements that the DERCs will be used for compliance:

**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

Continue to Section IX (next page)





**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>47.7</u>  | PM <sub>10</sub> : _____ | SO <sub>2</sub> : _____ | VOC: _____ |
| Offset Ratio (if required)  | CO: _____ | NO <sub>x</sub> : <u>10:1</u>  | 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: _____ |
| Compliance Margin (+ 5%)<br><i>(If DERC use requires &gt;10 tons)</i>           | CO: _____ | NO <sub>x</sub> : _____        | PM <sub>10</sub> : _____ | SO <sub>2</sub> : _____ | VOC: _____ |
| <b>Total DERCS</b>  | CO: _____ | NO <sub>x</sub> : <u>477.0</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: RN100225945  
 Certificate number of the DERCS acquired or to be acquired: D2548  
 Date on which the DERCS were acquired or will be acquired: 2010  
*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 Signature Date September 20, 2013  
 Title Regional EH&S Specialist



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

September 20, 2013

CERTIFIED MAIL 7012 3050 0001 6057 3611

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

**ROHM AND HAAS TEXAS INC DEER PARK PLANT RN100223205  
NOTIFICATION OF INTENT TO USE DERCS  
FORM DEC-2**

Dear Mr. Greulich:

The purpose of this submittal is to notify the TCEQ that Rohm and Haas Texas Inc. Deer Park Plant RN100223205 intends to use discrete emission reduction credits to supplement its mass emission cap and trade allowance requirements for the 2013 control period.

For future correspondence, please contact:

Prentice C. James (979) 238-1443 or  
FAX (979) 238-0317  
e-mail pcjames@dow.com

Respectfully,

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

BCC Monique Bass  
Jacques Bordelon  
Fran Falcon

OEB, Building #195/110  
Old Engr. Building/111  
B-101

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**From/Expéditeur:**

Prentice C. James  
The Dow Chemical Company  
Texas NOx/HRVOC Project  
2301 N. Brazosport Blvd. OC-601, G-115  
Freeport, TX 77541-3257

**RECEIVED**

SEP 23 2013

TCEQ MAIL CENTER  
BC

**To/Destinataire:**

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

**INTERNATIONAL RESTRICTIONS APPLY:**  
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| CERTIFICATE | POLLUTANT | GENERATION PERIOD<br>START DATE | GENERATION PERIOD<br>END DATE | TONS<br>AVAILABLE | LAST<br>PROJECT | GENERATOR<br>CERTIFICATE |
|-------------|-----------|---------------------------------|-------------------------------|-------------------|-----------------|--------------------------|
| D2548       | NOX       | 11/1/1994                       | 12/31/1997                    | 477               | 408251          | D1007                    |

4 — Also —

Bryan W. Shaw, Ph.D., *Chairman*  
Toby Baker, *Commissioner*  
Zak Covar, *Executive Director*



**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**  
*Protecting Texas by Reducing and Preventing Pollution*

October 3, 2013

Mr. Prentice C. James  
Regional EH&S Specialist  
Rohm and Haas Texas Incorporated  
2301 North Brazosport Boulevard, Building B-101  
Freeport, Texas 77541

Re: Notice of Intent to Use Discrete Emission Credits  
Rohm and Haas Texas Deer Park Plant  
Deer Park, Harris County  
Regulated Entity Reference Number: RN100223205  
Customer Reference Number: CN600131395  
Portfolio Number: P0607  
Certificate Number: D-2548

Dear Mr. James:

This letter is in response to a Form DEC-2 (Notice of Intent to Use Discrete Emission Credits) received September 23, 2013 from Rohm and Haas Texas Incorporated for compliance with 30 Texas Administrative Code Chapter 101, Subchapter H, Division 3 for the period of January 1, 2013 through December 31, 2013. We understand Rohm and Haas Texas Incorporated plans to use a total of 477.0 tons of nitrogen oxides (NO<sub>x</sub>) Discrete Emission Reduction Credits (DERC) to supplement the Mass Emissions Cap and Trade allowances for the Rohm and Haas Texas Deer Park Plant during the 2013 control period, as provided in §101.356(h). Because of the 10:1 ratio in §101.356(h)(5), the 477.0 tons of DERCs set aside will provide 47.7 tons of MECT allowances for the plant during the 2013 control period.

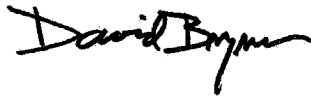
We have reviewed your application and have found that the notice and the credits set aside meet the requirements of §101.356(h). For the use period of January 1, 2013 through December 31, 2013, a total of 477.0 tons of NO<sub>x</sub> DERCs will be set aside from DERC certificate D-2548. A Form DEC-3 (Notice of Use of Discrete Emission Credits) must be submitted by March 31, 2014, along with the site's 2013 Form ECT-1 (Annual Compliance Report).

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 Thomas at (512) 239-0012, 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  
October 3, 2013

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 that reads "David Brymer". The signature is written in a cursive, slightly slanted style.

David Brymer, Director  
Air Quality Division

DB/JT/jm

cc: Air Section Manager, Region 12 – Houston  
Mr. Bob Allen, Director, Harris County Pollution Control Services Department, Pasadena

Project 408399

## Banking and Trading Route Slip

| AIR QUALITY DIVISION<br>Emissions Banking and Trading Program (EBTP)                                  |                         |                                     |      |
|---|-------------------------|-------------------------------------|------|
| Company Name: <b>ROHM AND HAAS TEXAS INCORPORATED</b>   |                         |                                     |      |
| Project Number: <b>408399</b>   |                         |                                     |      |
| Type of Letter Correspondence: <b>DCUA</b> <b>DCTR</b>  |                         |                                     |      |
| Letter Document Number(s): <b>22134</b> <b>22135</b>  |                         |                                     |      |
| Certificate Number(s): <b>N/A</b>   |                         |                                     |      |
| Review and Approval   | Initial and Date        | Comments/Special Instructions       |      |
| Brandon Greulich, Work Lead<br>EBTP   | <b>RG</b> 10/3/13       | Minor edit - remove extra \$ symbol |      |
| Author/Creator Review   | <b>JMS</b><br>10/2/2013 |                                     |      |
| Peer Review Completed   | JM 10/2/13              |                                     |      |
| Author/Creator  | <b>JMS</b><br>10/1/2013 | Copies Made                         | Date |
|   |                         | Mailed                              | Date |
| Please return <b>Routing Slip</b> and <b>Project Paperwork</b> to Brandon Greulich, MC-206, Ext. 4904 |                         |                                     |      |

C 10/4/13

BRANDON -

THE GENERATION PERIOD END DATE ON D-2548 IS WRONG IN IMS (ALSO FOR PARENT D-1007). THE PERIOD WAS 1/1/1994 THROUGH 12/31/1994 (NOT ENDING IN 1997 AS SHOWN IN IMS). THIS IS SHOWN IN THE HARD FILE FOR D-1007. Done 10/3/13