

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*



AIR DERC_100542711-300964_
USE_20050519_Use_D1244

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 17, 2005

Mr. Gary G. Long
Environmental Consultant
E. I. DuPont de Nemours, Inc.
P.O. Box 1089
Orange, Texas 77631-1089

Re: Use of Discrete Emission Reduction Credits (DERCs)
DuPont Sabine River Works
Orange, Orange County
Regulated Entity Number: RN100542711
Customer Reference Number: CN600128284

Dear Mr. Long:

This letter is in response to your Form DEC-3, entitled "Notice of Use of Discrete Emission Credits," dated March 10, 2005, regarding the use of 135.7 tons of nitrogen oxides (NO_x) DERCs for the purpose of compliance with Title 30 Texas Administrative Code (30 TAC) § 117.207 for the period of December 15, 2003 through December 15, 2004.

Upon review of the use of these credits, we agree that the use of 135.7 tons NO_x DERCs meet the requirements of 30 TAC 117.207. Enclosed please find certificate D-1245 for 214.3 tons of NO_x DERCs that were remaining from the Intent to Use dated October 30, 2003. Also enclosed is certificate D-1016 for 7.0 tons of NO_x DERCs. During the review of this account, it was realized that certificate D-1016 was never issued to E. I. DuPont de Nemours, Inc.

Please reference the regulated entity number (RN) and customer reference number (CN) noted in this document in all your future banking and trading correspondence. The RN replaces the former Texas Commission on Environmental Quality account number for the facility or site. The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Mr. Gary G Long

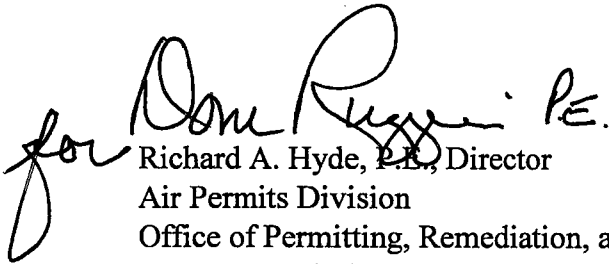
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May 17, 2005

Re: Use of Discrete Emission Reduction Credits (DERCs)

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. Joe P. Etheridge at (512) 239-2460, or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

for Don Ruggieri, P.E.

Richard A. Hyde, P.E., Director

Air Permits Division

Office of Permitting, Remediation, and Registration

Texas Commission on Environmental Quality

RAH/JPE/def

cc: Air Section Manager, Region 10 - Beaumont

Project Number: 300964

The State of Texas

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Certificate Number

D-1245



Number of Credits

214.3 tons NOx

Discrete Emission Reduction Credit Certificate

This certifies that
E.I. DuPont de Nemours & Company Inc.
P.O. Box 1089
Orange, Texas 77631

is the owner of 214.3 tons of nitrogen oxide discrete emission reduction credits established under the laws of the State of Texas, transferable only on the books of the Texas Commission on Environmental Quality, by the holder hereof in person or by duly authorized Attorney, upon surrender of this certificate.

The owner of this certificate is entitled to utilize the discrete emission credits evidenced herein for all purpose authorized by the laws and regulations of the State of Texas and is subject to all limitations prescribed by the laws and regulations of the State of Texas.

Discrete Emission Reduction Generation Period: October 1994 - December 1997

Generator Regulated Entity No.: RN100216035

Generator Certificate: Serial Numbers

County of Generation: Jefferson

May 17, 2005

Date

A handwritten signature in dark ink, appearing to be "D. B. White", written over a horizontal line.

Executive Director
Texas Commission on Environmental Quality

DISCRETE EMISSION CREDITS/EMISSION CREDIT USE TECHNICAL REVIEW

Project No.:	300964	Customer Reference No.:	CN600128284
Project Type:	BUSE	Regulated Entity No.:	RN100542711
Company:	Ei Dupont De Nemours Inc	Facility Name:	Dupont Sabine River Works
City:	Orange	County:	Orange
Project Reviewer:	Mr. Joe P. Etheridge	Portfolio Name:	Dupont - Sabine River Works

Project Overview

E.I. DuPont de Nemours & Company Inc. submitted a Notice of Use of Discrete Emission Credits (DEC-3) on March 10, 2005. They have requested that 135.7 TPY of DERCs be used for alternative compliance in order to meet the most Reasonably Available Control Technology (RACT) at their Sabine River Works Plant. Discrete Emissions Reduction Credit Certificates D-1112 (70.3 tons) and D-1244 (65.4 tons) has been completely used while DERC certificate D-1245 for 214.3 tons NOx will be issued to contain the remainder from the 350 NOx tons that were held under intent from serial numbers. Certificate D-1245 will be sent to E.I. DuPont de Nemours and Company Inc for use at a later date.

Discrete Emission Credit / Emission Reduction Credit Use

Credits are being applied to E.I. DuPont de Nemours & Company Inc. at their Sabine River Works Plant in order to meet RACT.

Certificate(s) to be used	D-1112 & D-1244
Pollutant	NOx
Amount	135.7
Regulation	117.205 e
Use period/Use Date	12/15/03 to 12/15/04

Credit Use Calculation Methods

E.I. DuPont de Nemours & Company Inc operates 12 FINs at their Sabine River Works Plant. DERC use was calculated using the following example:

$$\text{Level of Activity} * (\text{Actual Emission Rate} - \text{Regulatory Emission Rate}) = \text{DERC Used}$$

FIN	LOA (hrs)	AER (pph)	RER (pph)	DERCs (tons)
PL-2C	5208	3.27	2.18	2.8
PL-2B	5306	2.63	2.18	1.2
PL-2D	7669	7.91	3.63	16.4
PL-2E	7818	4.89	3.63	4.9
PL-2F	8170	11.64	5.81	23.8

**DISCRETE EMISSION CREDITS/EMISSION CREDIT USE
TECHNICAL REVIEW**

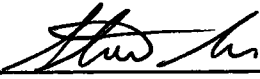
Regulated Entity Number: RN100542711

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PL-2G	8017	13.79	5.81	32.0
PL-7B	5527	3.68	3.63	0.1
PL-7F	7250	2.57	5.29	-9.9 (0.0)
PL-7C	7798	13.95	5.29	33.8
PL-7D	6065	5.6	3.63	6.0
PL-7E	7162	4.27	3.63	2.3
PL-7G	7078	3.64	5.29	-5.8 (0.0)
DERCs Used:				123.3
10% Contribution				12.33
Total				135.7

Conclusion:

All required information has been properly submitted and reviewed. Allowances in the amount of 135.7 TPY has been applied to E.I. DuPont de Nemours & Company for use at their Sabine River Works Plant, (Regulated Entity No.:RN100542711) from 12/15/03 to 12/15/04.

 _____ Project Reviewer	<u>4/21/05</u> Date	 _____ Team Leader/Section Manager/Backup	<u>4/22/05</u> Date
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The State of Texas
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Certificate Number

D-1244



Number of Credits

65.4 tons NOx

Discrete Emission Reduction Credit Certificate

This certifies that
E.I. DuPont de Nemours & Company Inc.
PO Box 1089
Orange, TX 77631-1089

is the owner of 65.4 tons of nitrogen oxide discrete emission reduction credits established under the laws of the State of Texas, transferable only on the books of the Texas Commission on Environmental Quality, by the holder hereof in person or by duly authorized Attorney, upon surrender of this certificate.

The owner of this certificate is entitled to utilize the discrete emission credits evidenced herein for all purpose authorized by the laws and regulations of the State of Texas and is subject to all limitations prescribed by the laws and regulations of the State of Texas.

Discrete Emission Reduction Generation Period: October 1994 - December 1997

Generator Regulated Entity No.:RN100216035

County of Generation: Jefferson

Generator Certificate: Serial Numbers

USED
PURPOSE: 30 TAC 117.105
DATE: 5/17/05

May 17, 2005
Date

Executive Director
Texas Commission on Environmental Quality

The State of Texas

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Certificate Number

D-1112



Number of Credits

70.3 TONS NO_x

Discrete Emission Reduction Credit Certificate

This certifies that:

E.I DuPont de Nemours & Company

P.O. Box 1089

Orange, Texas 77631-1089

is the owner of 70.3 tons of nitrogen oxide (NO_x) discrete emission reduction credits established under the laws of the State of Texas, transferable only on the books of the Texas Commission on Environmental Quality, by the holder hereof in person or by duly authorized Attorney, upon surrender of this certificate.

The owner of this certificate is entitled to utilize the discrete emission credits evidenced herein for all purpose authorized by the laws and regulations of the State of Texas and is subject to all limitations prescribed by the laws and regulations of the State of Texas.

Discrete Emission Reduction Generation Period: October 1994-December 1997

Regulated Entity Number: RN100216035

County of Generation: Jefferson

Generator Certificate: N/A

January 16, 2004

Date

Margaret Hoffman

Executive Director

Texas Commission on Environmental Quality

USED
PURPOSE: 30 TOL 117205
DATE: 5/17/05



DuPont
Sabine River Works
P.O. Box 1089
Orange, TX 77631-1089

March 11, 2005

CERTIFIED MAIL: 7003 2260 0005 2272 2848

Mr. Cory Chism (MC-162)
Office of Permitting, Remediation, and Registration
Emissions Banking and Trading Program
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Re: Notice of Use of Discrete Emission Reduction Credits, Form DEC-3 Submittal, DuPont Sabine River Works, Orange, TX, CN600128284, RN100542711

Dear Mr. Chism:

Enclosed is Form DEC-3, Notice of Use of Discrete Emission Reduction Credits (DERCs) for compliance with NOx RACT. Form DEC-2 was submitted for intent to use NOx DERCs for the period 12/15/03 to 12/15/04 on October 30, 2003.

The enclosed Form DEC-3 for the time period 12/15/03 to 12/15/04, represents 119 tons of NOx DERCs usage which includes the 10% environmental contribution. This usage is far less than the 350 tons reserved/estimated for this time period.

If you have any questions, please call Gary Long at (409) 886-6985.

Sincerely,

Gary G. Long
Environmental Consultant
DuPont Sabine River Works

CC: Mr. Stuart Mueller, TCEQ, Beaumont, TX

Attachments

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MAR 15 2005

AIR PERMITS DIVISION



Form DEC-3 (Page 2)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.374)

V. TONS OF DERCs USED								
Emission Point No.	FIN	Air Contaminant	Calculation of DERCs					
			Baseline Activity (hrs)	Baseline Emission Rate (pph)	Actual Activity (hrs)	Actual Emission Rate (pph)	Most stringent emission rate (pph)	DERCs (Tons)
PL-2C		NOx	5208	2.18	5208	3.27	2.18	2.8
PL-2B		NOx	5306	2.18	5306	2.63	2.18	1.2
PL-2D		NOx	7669	3.63	7669	7.91	3.63	16.4
PL-2E		NOx	7818	3.63	7818	4.89	3.63	4.9
PL-2F		NOx	8170	5.81	8170	11.64	5.81	23.8
PL-2G		NOx	8017	5.81	8017	13.79	5.81	32.0
PL-7B		NOx	5527	3.63	5527	3.68	3.63	0.1
PL-7F		NOx	7250	5.29	7250	2.57	5.29	-9.9
PL-7C		NOx	7798	5.29	7798	13.95	5.29	33.8
PL-7D		NOx	6065	3.63	6065	5.60	3.63	6.0
PL-7E		NOx	7162	3.63	7162	4.27	3.63	2.3
PL-7G		NOx	7078	5.29	7078	3.64	5.29	-5.8

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Form DEC-3 (Page 1)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.374)

A notice of intent to use must be submitted to the Texas Commission on Environmental Quality (TCEQ) DERC Registry in accordance with the following requirements:

I. COMPANY IDENTIFYING INFORMATION		
A. Company Name: E.I. DuPont de Nemours & Company		
B. Owner or Operator of User Source: Same		
C. Plant/Site Name: Sabine River Works		
D. Street Address: 3055 FM 1006		
E. Nearest City: Orange	F. Zip Code: 77631-1089	
G. County: Orange	H. Primary SIC: 2869	
I. Regulated Entity Number: 100542711	J. Air Permit No.: OC-0007-J	
K. Telephone: 409-886-6985	L. Fax: 409-886-6451	
M. Mailing Address: P.O. Box 1089		
City: Orange	State: Tx	Zip Code: 77631-1089
II. TECHNICAL CONTACT IDENTIFYING INFORMATION		
A. Technical Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) Gary G. Long		
B. Technical Contact Title: Environmental Consultant		
C. Telephone: 409-886-6985	D. Fax: 409-886-6451	E. E-Mail: gary.g.long-sr-1@usa.dupont.com
F. Mailing Address: P.O. Box 1089		
G. City: Orange	State: Tx	Zip Code: 77631-1089
III. STATE AND FEDERAL REQUIREMENTS		
Applicable State and Federal requirements that the DERCs were used for compliance: 30 TAC 117.207		
IV. USE PERIOD		
Use Start Date <u>12 / 15 / 03</u>		Use End Date <u>12 / 15 / 04</u>

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Form DEC-3 (Page 3)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.374)

VI. MOST STRINGENT EMISSION RATE

Describe basis for most stringent allowable emission rate: ☐ Permit _____ ☒ RACT _____ ☐ Other: _____

Notes: 30 TAC 117.205(e) for gas-fired, lean burn, stationary, reciprocating internal combustion engines rated 300 hp or greater in BPA non-attainment area.

VII. PROTOCOL

Protocol used to calculate DERC:

Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form

VIII. TOTAL DERCs USED (round up to the nearest ton)

Tons of DERCs required (from Sect. VI.)	CO: _____	NO _x : 108	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : 11	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Compliance Margin (+ 5%) <i>(If DERCs requires >10 tons)</i>	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCs Used	CO: _____	NO _x : 119	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

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MAR 15 2005

TCEQ -10393 (Rev. 9/28/01)

These forms are for use by the sources participating in the
Emission Banking and Trading Program and are subject to revision. (NSRG 7322v2)

AIR PERMITS DIVISION

Page _____ of _____



Form DEC-3 (Page 4)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.374)

IX. DERC INFORMATION
Name of the DERC Generator: <u>DuPont Beaumont Works</u>
DERC Generator Account Number: <u>JE-0033-C</u>
Serial numbers of the DERCs used: <u>N/A</u>
<i>Note: The serial numbers are assigned by the TCEQ</i>
X. PURCHASE DATES AND PRICES
Date on which the DERCs were acquired or registered: <u>10 / 01 / 01</u>
Price of the DERCs acquired: \$ <u>700 . 00</u> per ton (Required)
XI. CERTIFICATION BY RESPONSIBLE OFFICIAL
I, <u>Gerald R. Ehrman</u> , 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.
Signature <u>Gerald R Ehrman</u> Signature Date <u>03/10/05</u>
Title <u>Site Manager</u>

Mail application to:
Emission Banking and Trading Program
TCEQ MC 163
PO BOX 13087
AUSTIN, TX 78711-3087

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MAR 15 2005

AIR PERMITS DIVISION