05/16/2005 ----- EBTP IMS- PROJECT RECORD ----- AIR DERC\_100618601-301358\_ CE\_20070119\_Certification

PROJECT#: 301358

STATUS: P

DISP CODE:

RECEIVED: 04/19/2005

PROJTYPE: BDIU

ISSUED DT: /

**PUB NOT REQ:** 

STAFF ASSIGNED TO PROJECT:

SUN, STEVE

#### **PROJECT TRANSACTIONS**

TRANSACTION TYPE: DERC-INTEN

**COMPANY DATA** 

COMPANY NAME: SAINT-GOBAIN VETROTEX AMERICA INC

CUSTOMER REGISTRY ID: CN600129753

**PORTFOLIO DATA** 

NUMBER: P1947 NAME: WICHITA FALLS FIBER GLASS - RN100g18601

SITE DATA

**REG ENTITY** 

**REGION: 3** 

ACCOUNT:

ID: RN100618601

SITE NAME: WICHITA FALLS FIBER GLASS REINFORCEMENT

COUNTY: WICHITA CITY: WICHITA FALLS

LOCATION:

#### **CONTACT DATA**

NAME: MR CARLOS DAVIS TITLE: ENVIRONMENTAL SERVICES MANAGER

e-mail: CARLOS.E.DAVIS@SAINT-GOBAIN.COM

STREET: 4515 ALLENDALE ROAD CITY/STATE, ZIP: WICHITA FALLS, TX, 76310-

FAX: 940-689-3442 ext PHONE: 940-689-3461 ext TRANSACTION DATA

DATE ENTERED: 2005-05-16 EFFECTIVE DATE: DELETED DATE:

DATE GENERATED:

**EXPIRATION DATE:** 

**CONTAMINATE:** 

TONS:

DOLLARS:

ALLOWANCE

CERTIFICATE NO .: COUNTY : WICHITA

Original Cert Num:

Parent Cert Num:

Child Cert Num:

Cert End Date:

## STREAM AND FUTURE TRADES DATA

### TRACKING ACTIVITES

TR - ENGINEER RECEIVE

PROJECT:

FA - PROJECT ISSUED:

TR - SUP/MANGR

APP/RVW RQSTD:

TR - PROJ TECH

COMPLETE:

### **PROJECT NOTES**

### PROJECT LINK

Kathleen Hartnett White, Chairman Larry R. Soward, Commissioner Martin A. Hubert, Commissioner Glenn Shankle, Executive Director



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 11, 2007

Mr. Carlos Davis Environmental Services Manager Saint-Gobain Vetrotex America, Inc. 4515 Allendale Road Wichita Falls, Texas 76310

Re: Notice of Intent to Use Discrete Emission Credits

Fiber Glass Reinforcements

Wichita Falls, Wichita

Regulated Entity Number: RN100218601 Customer Reference Number: CN600129753

Account Number: WH-0014-S

Dear Mr. Davis:

This letter is in response to your Form DEC-2 (Notice of Intent to Use Discrete Emission Credits), dated April 15, 2005, for the purpose of compliance with the emission limits for Furnace 3 set in Permit No. 5567/PSD-TX-784M1.

Use of the credits for this purpose does not meet the requirements of Title 30 Texas Administrative Code §§ 101.370 - 101.379. By using DERCs to exceed the limits in Permit No. 5567/PSD-TX-784M1, you will no longer be meeting Best Available Control Technology (BACT) standards. As stated in an email correspondence dated May 11, 2005, Discrete Emission Reduction Credits (DERCs) may not be used to meet requirements for BACT standards, 30 Texas Administrative Code  $\S101.376(c)(3)(C)$ .

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. Steve Sun at (512) 239-3554 or write to the Texas Commission on Environmental Quality, Chief Engineer's Office, Air Quality Division (MC-206), P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Calos Davis Page 2 January 11, 2007

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

for Susana M. Hildebrand, P.E. Director

Fuld CCL

Air Quality Division

Texas Commission on Environmental Quality

SM/SS/sa

cc: Air Section Managers, Region 3 - Abilene

Project Number: 301358

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

Project No.:

301358

Customer Reference No.: Regulated Entity No.:

CN600129753

Project Type:

City:

**BDIU** Saint Gobain Vetrotex America, RN100218601

Company:

Wichita Falls Fiber Glass

County:

Reinforcement Wichita

Project Reviewer:

Wichita Falls

Facility Name:

Mr. Steve Sun

Portfolio Name:

Wichita Falls Fiber Glass -

RN100218601

## **Project Overview**

Saint-Gobain Vetrotex America submitted a DEC-2, Notice of Intent to Use Discrete Emission Credits dated April 15, 2005. The company intends to use DERCs to exceed the NOx emission limits for a Furnace 3 in Permit No. 5567/PSD-TX-784M1. The company wants to increase the hourly NOx emissions for the furnace from 11.46 lb NOx/hr to 21.83 lb NOx/hr. The use period will be for 12 months and for a total of 40 tons of NOx.

After speaking to permit reviewers Stephanie Howell and Mandolin Shannon, the hourly limit set for the furnace in the permit is BACT requirements. If they were allowed to use the DERCs to exceed the limit they would be exceeding the BACT standards. As stated in 101.376(c)(3)(C), DERCs may not be used to meet BACT standards.

An email was sent to Mr. Carlos Davis, dated May 11, 2005, notifying him that the use will not be approved. A conference call was also set up to clarify to the company that the use will not be approved. The conference call included Mr. Davis, their lawyers, and TCEQ legal, Dan Long.

## Discrete Emission Credit / Emission Reduction Credit Use

Discuss reason for use.

Certificate(s) to be used	Not identified
Pollutant	NOx
Amount	
Regulation	Permit No 5567/PSD-TX-7841M1
Use period/Use Date	

## **Credit Use Calculation Methods**

Discuss calculation method for use

### Conclusion:

Saint-Gobain's intent to use is denied because by using the DERCs to exceed the permit limits for Furance 3 they would be exceeding BACT requirements.

Project Reviewer

Team Leader/Section Manager/Backup

1/4/07

Date

## Steve Sun - DEC-2 Notice of Intent to Use Discrete Emission Credits

From:

Steve Sun

To:

Carlos.e.davis@saint-gobain.com

Date:

5/11/2005 4:47 PM

**Subject:** DEC-2 Notice of Intent to Use Discrete Emission Credits

Mr. Davis,

I am writing to you concerning a DEC-2 Form, Notice of Intent to Use Discrete Emission Credits dated April 15, 2005 for your company, Saint-Gobain Vetrotex America, Inc. The Notice of Intent to Use is for exceeding the permit limits on Permit No. 5567/PSD-TX-784M1 for Furnace No. 3 ESP and Scrubber, FIN E-23A.

You wish to use 40 tons of NOx DERCs to raise your expected emission rate from 11.46 lb/hr to 21.83 lb/hr. Unfortunately, we cannot approve this intent to use. By increasing your emission rate beyond 11.46 lb/hr you will no longer be meeting BACT. As stated in 30 TAC 101.376(c)(3)(C). DERCs "may not be used to meet requirements for best available control technology standards..."

Please let me know if you have any more questions.

Steve Sun **Emissions Banking and Trading Team TCEO** (512) 239-3554



April 15, 2005

Emissions Banking and Trading Program
Texas Commission on Environmental Quality
Mail Code 163
P.O. Box 13087
Austin, Texas 78711-3087

Certified Mail / Return Receipt 7001 2510 0003 2116 0760

Subject:

Notice of Intent to Use Discrete Emission Credits,

Saint-Gobain Vetrotex America, Inc.,

Wichita Falls Fiber Glass Manufacturing Plant RN 100218601, Air Account Number WH-0014-S

Dear Sir or Madam:

Saint-Gobain Vetrotex America, Inc. (Vetrotex) is submitting the enclosed Texas Commission on Environmental Quality (TCEQ) Form DEC-2 and supporting documentation as its notice of intent to use Discrete Emission Reduction Credits (DERCs) at its Fiberglass Reinforcements Manufacturing Facility located in Wichita Falls, Wichita County, Texas.

I have enclosed the following documents for your review:

- Form DEC-2, Notice of Intent to Use Discrete Emission Credits,
- Notice of Intent to Use Discrete Emission Credits, Section VIII Protocol, and
- Page 2 of Permit 5667/PSD-TX-784M1 Maximum Allowable Emission Rate Table

We would like to thank you in advance for your prompt review and concurrence with this notification. If you have any questions regarding the information presented in this letter or attachments, please do not hesitate to call me at (940) 689-3461.

Very truly yours,

Saint-Gobain Vetrotex America, Inc.

Carlos Davis

Environmental Services Manager

Enclosures

ALCENIED.

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Emissions Banking and Tracing Program April 15, 2005 Page 2

cc: Ms Shannon Rhodes, TCEQ Air Permit Division, CM/RR# 7001 2510 0003 2116 0753

Ms. Stephanie Howell, TCEQ Air Permit Division, CM/RR# 7001 2510 0003 2116 0746

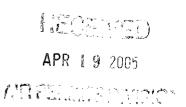
Mr. Mike Burch, Air Program Manager, TCEQ Region 3,

CM/RR# 7001 2510 0003 2116 0418

Mr. Ron Lane, President, Saint-Gobain Vetrotex America, Inc.

Ms. Liz Martin, Director of Manufacturing, Saint-Gobain Vetrotex America, Inc.

Ms. Stephanie Meadows, TITAN Engineering, Inc.





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

I,	Company Identifying Information	-	£ 4			perhitugues a	
A.	Company Name: Saint-Gobain Vetrotex America, Inc.						
	Mailing Address: 4515 Allendale Road						
	City: Wichita	State: Texa	as	Zip (	Code: 76310		:
	Telephone: (940) 689-3461			Fax:	Fax: (940) 689-3442		
B.	TCEQ Customer Number (CN): CN600	0129753			·		
C.	Site Name: Wichita Falls Fiber Glass R	einforcements N	/lanufacturing	Plant			
	Street Address: (if no street address, give	ve driving direct	ions to site)	4515 A	llendale Roa	d	
	Nearest City: Wichita Falls	Zip Code:	76310	Cour	ıty: Wichita		
D.	TCEQ Regulated Entity Number (RN):	RN100618601					
E.	Primary SIC: 3229	<del></del> -		Air I	Permit Numbe	er: 5667 & PSD	-TX-784M1
П.	Technical Contact Identifying Infor	mation					
A.	Technical Contact Name: (✓MrM	IrsMsD	r.) Carlos Da	vis			
	Technical Contact Title: Environmental Services Manager						
	Mailing Address: 4515 Allendale Road						
	City: Wichita Falls Sta	te: Texas	Zip Code: 76310				
	Telephone: (940) 689-3461 Fax: (94	0) 689-3442	E-mail: carlos.e.davis@saint-gobain.com			-	
Ш	III. 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 IX						
IV.	Intended Use Period	12 34 76 <b>4 2</b> 90006 3 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4					
	Intended Use Start Date 06/01/05			Inte	ended Use En	d Date 05/31/0	6

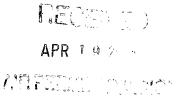
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# Form DEC-2 (Page 2) Notice of Intent To Use Discrete Emission Credits (Title 30 Texas Administrative Code § 101.370 - § 101.379)

deral Requirements							
Applicable State and Federal requirements that the DERCs will be used for compliance:  DERCs will be used to exceed the Permit No. 5667 Emission Limit for Furnace 3 (EPN E-23A) for a period not to exceed 12 months.							
ent Emission Rate							
Describe basis for most stringent allowable emission rate:							
Permit <u>5667</u> RACT Other:							

Continue to Section VII (next page)







## Form DEC-2 (Page 3)

Notice of Intent To Use Discrete Emission Credits (Title 30 Texas Administrative Code § 101.370 - § 101.379)

A. T. F. E. M. S. P. W. S. C.

VII. Tons of DERCS Required									
		100	Calculation of DERCs						
Emission Point No.	FIN	Air Contaminant	Expected Activity (units)	Expected Emission Rate (units)	Expected Total Emissions (tons)	Regulated Activity (units)	Regulated Emission Rate (units)	Regulated Total Emisssions (tons)	DERCs (tons)
E-23A	F-23	NOx	<8,760 hr/yr	<21.83 lb/hr	90.19	8,760 hr/yr	11.46 lb/hr	50.19	40
***************************************									
<u>.</u>	<u></u>								
				- 10 Per		Prodjetova pagoljejak i Garrin Pograjije		Total:	40



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

#### 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 See attachments. IX. Total DERCS Required for Use (round up to the nearest tenth of a ton) $NO_x$ : 40Tons of DERCs CO: PM<sub>10</sub>: \_\_ SO<sub>2</sub>: VOC: required (from Sect. VII.) $NO_x$ : N/APM<sub>10</sub>: SO<sub>2</sub>: VOC: Offset Ratio (if CO: required) Environmental $NO_{x}$ : VOC: Contribution (+ 10%) CO: PM<sub>10</sub>: SO<sub>2</sub>: Compliance Margin (+ 5%) (If DERC use $NO_x$ : 2 SO<sub>2</sub>: requires >10 tons) CO: PM<sub>10</sub>: \_ VOC: $NO_x$ : 46 PM<sub>10</sub>: CO: VOC: **Total DERCs** SO<sub>2</sub>: **DERC** Information Name of the DERC Generator: AEP Texas North Company DERC Generator Regulated Entity Number: \_RN102688835 Certificate number of the DERCs acquired or to be acquired: 1080 Note: The certificate number is assigned by the TCEQ

TCEQ 10392 - (Revised 03/05) - Form DEC-2 This form is for use by facilities subject to air quality permit requirements and may be revised periodically [APDG5089v3]



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Page \_4\_\_ of \_5\_\_

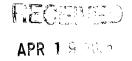




# Form DEC-2 (Page 5) Notice of Intent To Use Discrete Emission Reduction Credits (Title 30 Texas Administrative Code § 101.370 - § 101.379)

XI. Purchase Date and Price
Date on which the DERCs were acquired or will be acquired:06/_01 / 05
Price or expected price of the DERCs: <u>\$ 200</u> per ton (Required)
XII. Certification by Responsible Official
I Carlos Davis, hereby certify, that the emission reductions claimed on this notice meet the requirements of 30 TAC Chapter 101, Subchapter H, Division 4. 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.
SignatureSignature Date 4/15/05  Title Environmental Services Manager

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





## NOTICE OF INTENT TO USE DISCRETE EMISSION CREDITS

## SECTION VIII. PROTOCOL

## SAINT-GOBAIN VETROTEX AMERICA, INC.

Inputs	Parameters	Basis
Expected Activity	<8,760 hr/yr	Maximum expected operating hours.
Expected Emission Rate	<21.83 lb NO <sub>X</sub> /hr	Preliminary stack test data.  Maximum expected total emissions allowed per the
Expected Total Emissions	90.19 tons	Maximum expected total emissions allowed per the requirements of 30 Texas Administrative Code (TAC) §101.376(b)(1)(B).
Regulated Activity	8,760 hr/yr	Allowable operating hours from TCEQ Air Permit Nos. 5667 & PSD-TX-784M1, dated February 28, 2005.
Regulated Emission Rate	11.46 lb NO <sub>x</sub> /hr	Allowable hourly emission rate from TCEQ Air Permit Nos. 5667 & PSD-TX-784M1, dated February 28, 2005.
Regulated Total Emissions	50.19 tons	Allowable annual emission rate from TCEQ Air Permit Nos. 5667 & PSD-TX-784M1, dated February 28, 2005.

## EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

## AIR CONTAMINANTS DATA

Emission	Source	Air Contaminant	Emission :	Rates *
Point No. (1)	Name (2)	Name (3)	lb/hr	TPY
E-15A	Batch Blender No. 2	PM/PM <sub>t0</sub>	0.11	0.48
E-16	Batch Blender No. 3	PM/PM <sub>10</sub>	0.16	0.72
E-16A	Batch Blender No. 3	PM/PM <sub>10</sub>	0.16	0.72
E-17	Scale 5 Baghouse	PM/PM <sub>10</sub>	0.02	80.0
E-18	BH Vacuum Baghouse	PM/PM <sub>10</sub>	0.04	0.18
E-19	Scale Hopper Baghouse	PM/PM <sub>10</sub>	0.09	0.39
E-21A	Furnace No. 1 ESP and Scrubber	PM/PM <sub>10</sub> VOC NO <sub>x</sub> SO <sub>2</sub> CO	5.63 0.19 11.81 7.88 2.81	24.66 0.83 51.73 34.51 10.00
E-23A	Furnace No. 3 ESP and Scrubber	PM/PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub> CO VOC	5.46 6.66 11.46 2.73 0.28	23.91 29.17 50.19 11.96 1.23
E-24A	Furnace No. 4 ESP and Scrubber	PM/PM <sub>10</sub> SO <sub>2</sub> NO <sub>x</sub> CO VOC	4.58 11.14 9.63 2.29 0.22	20.06 48.79 42.18 10.03 0.96
E-25	Batch Hold Bin No. 1 Baghouse	PM/PM <sub>10</sub>	0.16	0.70
E-26	Batch Hold Bin No. 2 Baghouse	PM/PM <sub>10</sub>	0.16	0.70
		RECEIPED.		

RECEIVED

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Will Emergine Comment