

03/28/2002 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 88002	PERMIT#: M	STATUS: P	DISP CODE: _____
RECEIVED: 03/26/2002	PROJTYPE: BDRC		ISSUED DATE:
FEE DATE:	FEE AMT: \$ 0	STDY1/SP: 0	SUP-DISP DATE:
GROUP: EBTP			
TECHENGR : SUN, STEVE			
ADMIN REVIEW			
A - PARTRANS :		A - PAR RECEIVED :	

ISSUED TO: WYMAN-GORDON FORGINGS INC

PRIMARY CONTACT INFORMATION

NAME: MR DAVID C HOFFMAN	TITLE: MGR ENVIRONMENTAL SERVICES
PHONE: 281-856-3264 ext	FAX: 281-856-3150 ext
STREET: PO BOX 40456	CITY/STATE, ZIP: HOUSTON, , 77240-0456

PROJECT INFORMATION

UNIT: HOUSTON PLANT		
SIC: 3317	REGION: 12	ACCOUNT: HG0114A
COUNTY: HARRIS	CAPUNITS:	UNITTYPE:
CAPACITY:	CITY: HOUSTON	
LOCATION: 0		

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

**EMISSION
RATES****PROJECT NOTES****TECHNICAL ACTIVITY HISTORY**

SUP - TRANS TO ENGINEER :	SUP - PROJECT ISSUED :	TR - PROJECT RECEIVED :
SUP - RECEIVED FROM PAR :	TR - PROJ TECH COMPLETE :	

PROJECT ATTRIBUTES**PROJECT LINK****PROJECTS/PERMITS VOIDANCE**

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Kathleen Hartnett White, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

June 4, 2002

Mr. David C. Hoffman
Manager, Environmental Services
Wyman-Gordon Forgings, Inc.
P.O. Box 40456
Houston, Texas 77240-0456

Re: Review of Discrete Emission Reduction Credits Generation
Houston Plant
Houston, Harris County
Account Number: HG-0114-A

Dear Mr. Hoffman:

This is in reply to the above-referenced application for discrete emission reduction credits, DEC-1 form dated March 21, 2002. We have reviewed your request and are unable to approve the credits claimed. Generation of credit by this reduction strategy does not meet the requirements of Title 30 Texas Administrative Code Chapter 101 (30 TAC Chapter 101), Subchapter H, Division 4, *Discrete Emission Credit Banking and Trading*, for the following reason:

The Discrete Emission Reduction Credits may not be generated by any strategy that curtails an activity at a source.

Thank you for your cooperation in this matter. If you have questions concerning this transaction, call Mr. Steve Sun at (512) 239-3554. If you need further assistance regarding the banking program or future transactions, please call Mr. Matt Baker at (512) 239-1091 or write to the Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in dark ink, appearing to read "John F. Steib, Jr.", written over a horizontal line.

John F. Steib, Jr., Director
Air Permits Division
Office of Permitting, Remediation & Registration

JFS/SSS/biw

cc: Mr. Arturo Blanco, Air Program Manager, Region 12 - Houston
Mr. Manuel Aguirre, P.E., Bureau Chief, Bureau of Air Quality Control, Health and Human Services Department, City of Houston, Houston
Mr. Rob Barrett, Director, Harris County Public Health and Environmental Services, Pollution Control Department, Pasadena

Record Number 88002

**DISCRETE EMISSION REDUCTION CREDITS (DERCs) VERIFICATION
SOURCE ANALYSIS & TECHNICAL REVIEW**

Permit No: M
Project Type: BDRC
Record No: 88002
Account No: HG-0114-A
Engineer: Mr. Steve Sun

Company: Wyman-Gordon Forgings Inc
Facility Name: Houston Plant
City: Houston
County: Harris

Project Overview

Wyman-Gordon Forgings, Inc submitted a form DEC-1 on March 26, 2002 seeking to generate DERCs at their Houston facility from six natural gas-fired furnaces. Due to the rise in natural gas prices, the company changed operational settings for the furnaces in order to reduce natural gas consumption. The changes consisted of optimizing burner efficiency by modifying burner settings to reduce btu/hr rating and decrease excess air. The company is claiming AP-42 emission factors for these furnaces. Essentially the company is reducing the level of activity on these furnaces while maintaining the same emission rate.. Based on this reduction strategy the generation of DERCs will not be approved for the following reason:

As stated in §101.373(c)(1)(A) " Discrete emission reduction credits(DERCs) may be generated by any strategy that reduces a source's emission rate below its baseline and is approved by the executive director, except for the following: (1) A temporary shutdown or curtailment of an activity at a source.

Conclusion:

Wyman-Gordon Forgings, Inc will not receive the DERCs that were generated in the 12 month period ending December 31, 2001 because the reduction strategy is not an approved method to generate DERCs.



Permit Engineer

5/24/02

Date



Team Leader/Section Manager/Backup

5/23/02

Date

**DISCRETE EMISSION REDUCTION CREDITS (DERCs) VERIFICATION
SOURCE ANALYSIS & TECHNICAL REVIEW**

Permit No: M
Project Type: BDRC
Record No: 88002
Account No: HG-0114-A
Engineer: Mr. Steve Sun

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Permit Engineer 5/23/02
Date



Team Leader/Section Manager/Backup 5/23/02
Date



Wyman-Gordon Forgings
P.O. Box 40456
Houston, TX 77240-0456
281-856-9900

March 21, 2001

Steve Sun
Texas Natural Resources Conservation Commission
Emission Banking and Trading Program
MC 162
P.O. Box 13087
Austin, TX 78711-3087

Re: Discrete Emission Reduction Credits – Wyman-Gordon Forgings, Inc.
HG-0114-A

Dear TNRCC:

Attached please find Form DEC-1, Notice of Generation and Generator Certification of Discrete Emission Credits for Wyman-Gordon Forgings, Inc. (Wyman-Gordon). These reductions were made for emission units 2830, D132, F120, F121, F276, and F500 during 2001. The 6 affected emission units are large, natural gas-fired furnaces authorized under 30 TAC 106.320.

In late 2000 and early 2001 when natural gas prices were substantially elevated, Wyman-Gordon conducted a survey of many of the large natural gas-fired furnaces operating at the facility. The objective of the survey was to determine if furnace settings could be optimized in order to reduce natural gas consumption and achieve any cost savings as a result.

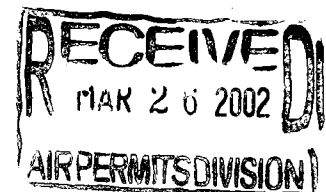
As a result of the survey, changes were made to the operational settings for furnaces 2830, D132, F120, F121, F276, and F500. These changes consisted of modifying burner settings to reduce btu/hr rating and/or decrease excess air percentages. Natural gas usage for 2000 and 2001 are identified on the attached form DEC-1. NOx emission reductions are based on a reduction in natural gas usage from 2000 to 2001. No changes were made that would affect emission factors and no products were shifted to other production units.

If you have any questions, please contact me at (281) 856-3264.

Sincerely

David C. Hoffman
David C. Hoffman, P.E.
Manager of Environmental Services

Enclosures



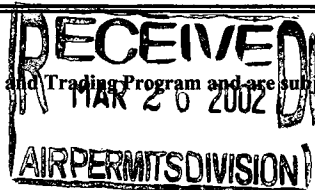


Form DEC-1 (Page 1)
Notice of Generation and Generator Certification
of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.374)

UPDATE: The TNRCC is now requiring all applications to be accompanied by the new TNRCC CORE Data Form located at: <http://www.tnrcc.state.tx.us/permitting/projects/cr/index.html>.

A notice of generation and generator certification must be submitted to the Texas Natural Resource Conservation Commission (TNRCC) DERC Registry in accordance with the following requirements if the reduction is to be creditable and marketable:

I. COMPANY IDENTIFYING INFORMATION		
A. Company Name: <i>Wyman - Gordon Forgings, Inc.</i>		
B. Owner or Operator of Generator Source: <i>Wyman - Gordon Forgings, Inc.</i>		
C. Plant/Site Name: <i>Houston</i>		
D. Street Address: <i>10825 Telge Rd</i>		
E. Nearest City: <i>Houston</i>	F. Zip Code: <i>77095</i>	
G. County: <i>Harris</i>	H. Primary SIC: <i>3264</i>	
I. TNRCC Account No.: <i>H6-0114-A</i>		
J. Telephone: <i>281 856-9900</i>	K. Fax: <i>281 856 3150</i>	
L. Mailing Address: <i>P.O. Box 40456</i>		
City: <i>Houston</i>	State: <i>TX</i>	Zip Code: <i>77240</i>
II. TECHNICAL CONTACT IDENTIFYING INFORMATION		
A. Technical Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) <i>David Hoffman</i>		
B. Technical Contact Title: <i>Manager, Environmental Services</i>		
C. Telephone: <i>281 856-3264</i>	D. Fax: <i>281 856-3150</i>	E. Email: <i>dhoffman@wyman.com</i>
F. Mailing Address: <i>P.O. Box 40456</i>		
G. City: <i>Houston</i>	State: <i>TX</i>	Zip Code: <i>77240</i>
III. CONTACT FOR SALE OF CERTIFICATE		
A. Contact Name: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) <i>Same as above</i>		
B. Sale Contact Title:		
C. Telephone:	D. Fax:	E. Email:
F. Mailing Address:		
G. City:	State:	Zip Code:
IV. Generation Period		
<input checked="" type="checkbox"/> 12 months		Generation Period Start Date <i>11/10/01</i>
<input type="checkbox"/> Other _____ Days/months		Generation Period End Date <i>12/31/01</i>
V. Generation Activity		
<input checked="" type="checkbox"/> Shutdown <input checked="" type="checkbox"/> Additional Control <input checked="" type="checkbox"/> Other: <i>Modification of operation - see attached letter</i>		
Date of Shutdown: <i>1/1</i>		Date of Reduction: <i>1/1</i>





Form DEC-1 (Page 2)
Notice of Generation and Generator Certification
of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.374)

VI. EMISSIONS RATE DATA

Attach documentation which demonstrates the basis for each value represented in the following table.

If SA ≥ BA, then: (BER*BA) - (SER*SA) = reduction

If SA < BA, then: (BER*BA) - (SER*BA) = reduction

Emission Point No.	FIN	Air Contaminant	Calculation of DERCs					DERCs (T)
			Baseline Activity (units) <i>M Mscf</i>	Baseline Emission Rate (units) <i>lbs/MMscf</i>	Strategy Activity (units) <i>M Mscf</i>	Strategy Emission Rate (units) <i>lbs/MMscf</i>	Most stringent emission rate (units)	
82	2830	NO _x	121.71	100	105.40	100	NA	0.82
141	D132	NO _x	112.35	100	82.27	100		1.50
75	F120	NO _x	210.36	100	188.85	100		1.08
73	F121	NO _x	210.36	100	195.96	100		0.72
22	F276	NO _x	121.71	100	105.41	100		0.81
47	F500	NO _x	210.36	100	187.38	100		1.15

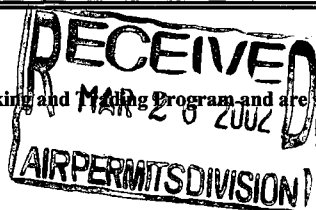
VII. Shutdown Emission Reduction Strategies

Has production shifted from the shutdown facility to another facility in the same nonattainment area? **G Yes*** **G No**
 *If Yes, DERC can not be claimed.

VIII. VOC

List Specific Compounds reduced:

Emission Point No.	FIN	Name of Air Contaminant	DERCs (T)





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

VIII. Most Stringent Emission Rate

Describe basis for most stringent emission rate: G Permit _____ G RACT _____ G Other: _____

NA

IX. Protocol

Protocol used to calculate DERC:

$$\left[(BA)(BER) - (SA)(SER) \right] / 2000 = DERC (tons)$$

VIII. CERTIFICATION BY RESPONSIBLE OFFICIAL

I, _____, hereby certify that the emission reductions claimed on this notice meet the requirements of 30 TAC Chapter 101, Subchapter H, Division 4 and are not based on an emission strategy prohibited in 30 TAC Chapter 101, Subchapter H, Division 4 to the best of my knowledge and belief and that the information entered in this application is correct to the best of my knowledge and belief.

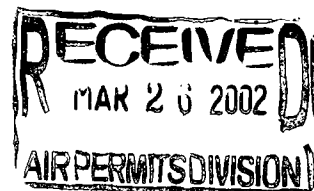
Signature _____

Signature Date 3-20-02

Title _____

Mail application to:

Emission Banking and Trading Program
TNRCC MC 162
PO BOX 13087
AUSTIN, TX 78711-3087





LOGOUT HELP IN/OUT STATUS Staff Company Site Contact Permit Project Tracking Element

Projects Listing

order:Project Number

(Click on the Project Number to view a project's data)

	Permit Num	Version	Permit Status	Permit Status Date	Project Num	Companyname	Customer Id	Project type	TNRCC Recvd Date	Disposal Date	Disposal Code	Par Staff	TechEngr	Unitn
1	12714	0			5059	CAMERON IRON WORKS, INC.		XRWW	05/12/81	07/10/81	X		KELLOGG, ART	PRO COIL BOO
2	13587	0			5439	CAMERON IRON WORKS, INC.		XRWW	04/29/82	06/07/82	X		RANDALL, JAMES	GAS LADL HEA
3	14143	0			5811	CAMERON IRON WORKS, INC.		XRWW	01/06/83	02/01/83	X		HAMILTON, RANDY	LADL PRE
4	14522	0			8554	CAMERON IRON WORKS, INC.		XRWW	05/20/83	06/14/83	X		MCARTHUR, GARY	MOL OPE
5	13463	0			9517	CAMERON IRON WORKS, INC.		XRWW	03/11/82	06/01/82	X		DAVIDSON, WAYNE	STU WEL GOU PRO
6	1809	0			14810	CAMERON FORGE COMPANY		ROWN	05/07/90	08/27/90	A	BRADFORD, CECIL	BRADFORD, CECIL	BAR FACI
7	1810A	0			15618	CAMERON FORGE COMPANY		RNEW	09/14/90	01/10/91	I		BLACKSTOCK, RITA	INGO GRIN

8	1809	0
9	3082	0
10	4288	0
11	1810	0
12	X	0
13	4813	0
14	34274	0
15	X	0
16	X	0
17	X	0
18	X	0

<u>16570</u>	CAMERON FORGE COMPANY
<u>16666</u>	CAMERON FORGE COMPANY
<u>20198</u>	CAMERON FORGE COMPANY
<u>21899</u>	CAMERON FORGED PRODUCTS COMPANY
<u>24391</u>	CAMERON FORGED PRODUCTS COMPANY
<u>27583</u>	CAMERON FORGED PRODUCTS COMPANY
<u>47867</u>	WYMAN- GORDON FORGINGS, INC.
<u>49812</u>	WYMAN- GORDON FORGINGS
<u>51883</u>	WYMAN- GORDON FORGINGS
<u>78270</u>	WYMAN- GORDON FORGINGS INC
<u>80569</u>	WYMAN- GORDON FORGINGS INC

CVOD	03/08/91	04/04/91	V	BRADFORD, CECIL	BRADFORD, CECIL	BAR FACI
RNEW	03/20/91	07/26/91	I		BLACKSTOCK, RITA	TOR OFF
RNEW	09/01/92	04/25/94	I		SMITH, J. WESLEY	PIPE
RNEW	04/27/93	10/18/93	I		GOULD, MICHAEL	BILL CON FACI
XLTR	10/27/93	11/05/93	X	NAEGLI, ALAN	LUSK, DAVID	SWN GRIN
RVOD	05/11/94	05/27/94	V	HOWELL, DAVID & BURUM, JOHN	BURUM, JOHN	BOIL OIL CON
XRWW	11/26/96	12/18/96	X	NAEGLI, ALAN	COTTINGTON, GRANT	ABR CLEA
XLTR	03/04/97	03/25/97	X	NAEGLI, ALAN	FOREY, MELISSA	DIE P FUR
XLTR	06/10/97	07/21/97	X	NAEGLI, ALAN	COTTINGTON, GRANT	ABR CLEA FACI
XLTR	01/17/01	03/08/01	X	ROMERO, RONICA	AKINTAN, NANCY	CER OF E SOU
XLTR	05/11/01	05/31/01	X	BARTLEY, LUCY	TAO, ANGELA	EXT PRE

19	M	0			81579	WYMAN-GORDON FORGINGS INC	BISC	06/26/01	10/31/01	C		ONUOHA, INNOCENT	FRE SITE
20	X	0			81692	WYMAN-GORDON FORGINGS INC	XLTR	07/03/01	08/09/01	D	BARTLEY, LUCY	N'DAME, EMMANUEL	1200 EXT PRE
21	M		P	02/05/02	86880	WYMAN-GORDON FORGINGS INC	BISC	01/31/02	03/07/02	C		ONUOHA, INNOCENT	
22	M		P	03/28/02	88002	WYMAN-GORDON FORGINGS INC	BDRC	03/26/02		P		SUN, STEVE	HOU PLAN

User logged in as: **STEVE SUN** | Application rights: **EXTERNAL USER**

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