

10/29/2003 ----- EBTP IMS-PROJECT RECORD -----

PROJECT#: 99580

STATUS: P

DISP CODE: C ✓

AIR DERC_100542711-99580_

RECEIVED: 07/23/2003

PROJTYPE: BDRC

ISSUED DT: 11/6/03 ✓

CE_20031106_Certification

PUB NOT REQ:

SUP-DISP DATE: 11/5/03 ✓

STAFF ASSIGNED TO PROJECT:

HARPER, CLINT

PROJECT TRANSACTIONS

TRANSACTION TYPE:

COMPANY DATA

COMPANY NAME: EI DUPONT DE NEMOURS & COMPANY INC

CUSTOMER REGISTRy ID: 600128284 ✓**PORTFOLIO DATA**

NUMBER: P0219 NAME: PORTFOLIO NAME for P0219

SITE DATA

REGION: 10 ACCOUNT: OC0007J REG ENTITY ID: RN100542711

SITE NAME: DUPONT SABINE RIVER WORKS

COUNTY: ORANGE

CITY: ORANGE

LOCATION: 0

CONTACT DATA

NAME: MR RICHARD H HAAR

TITLE: SENIOR ENGINEER

e-mail: RICHARD.H.HAAR-1@USA.DUPONT.COM

STREET: PO BOX 1089 CITY/STATE, ZIP: ORANGE, , 77631-1089

FAX: 409-886-9333 ext

PHONE: 409-886-9277 ext

TRANSACTION DATA

DATE ENTERED: EFFECTIVE DATE: DELETED DATE:

CONTAMINATE: TONS: DOLLARS:

ALLOWANCE CERTIFICATE NO.:

STREAM AND FUTURE TRADES DATA

TRACKING ACTIVITIES

FA - PROJECT ISSUED : TR - PROJECT RECEIVED :

Customer List

1 - 1 of 1 Customers

Name	Number
E I DU PONT DE NEMOURS AND COMPANY	CN600128284

[Central Registry Help](#) [Central Registry Glossary](#)

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 6, 2003

Mr. Richard H. Haar
E.I. DuPont de Nemours & Company, Inc.
P.O. Box 1089
Orange, Texas 77631-1089

Re: Application for Certification of Discrete Emission Reduction Credits
Project Number: 99580
Dupont Sabine River Works
Orange, Orange County
Regulated Entity Number: 100542711
Customer Reference Number: CN600128284

Dear Mr. Haar:

This is in reply to the above-referenced application for discrete emission reduction credits, DEC-1 form dated April 14, 2000. We received your letter, dated September 30, 2003, confirming that Dupont will not be able to submit the appropriate information requested in the deficiency letter dated July 24, 2003. Without the supporting documentation the DEC-1 form is incomplete.

Your application was voided on October 6, 2003.

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 TCEQ 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.

Thank you for your cooperation in this matter. If you have questions concerning this review, please contact Ms. Graciela Juarez at (512) 239-2990 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,

A handwritten signature in black ink, appearing to read "Dale L. Beebe Farrow".

Dale L. Beebe Farrow, P.E., Director
Air Permits Division
Office of Permitting, Remediation and Registration

DBF/GAJ/mfs

cc: Mr. Marion Everhart, Air Section Manager, Region 10 - Beaumont
Project Number: 99580

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

Steve Sun - NOx DERC Registration DuPont Sabine River Works

From: "Richard H Haar" <Richard.H.Haar-1@invista.com>
To: <ssun@tceq.state.tx.us>
Date: 9/30/2003 8:59 AM
Subject: NOx DERC Registration DuPont Sabine River Works
CC: "Gary G Long_Sr" <Gary.G.Long-Sr-1@usa.dupont.com>

In response to the TCEQ letter of 7/24/03, this is to confirm that DuPont Sabine River Works, Air Account OC-0007-J, will not be submitting documentation to certify the 589 tons of NOx DERCs filed 4/14/00. We have submitted a request for 285.3 tons of NOx DERCs on 7/28/03.

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Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

http://www.DuPont.com/corp/email_disclaimer.html

**DISCRETE EMISSION REDUCTION CREDITS (DERCs)
VERIFICATION TECHNICAL REVIEW**

Permit No: B910
Project Type: BDRC
Project No: 99580
Regulated Entity No: OC-0007-J
Reviewer: Ms. Graciela A. Juarez

Company: EI Dupont Nemours
& Company Inc.
Facility Name: Dupont Sabine River
Works
City: Orange
County: Orange

Project Overview

E I Dupont Nemours Company Inc. (Sabine River Works plant site) submitted a D-1, Notice of Generation Form, dated April 14, 2000. The DERC credits were generated by additional controls on 11 units for the period of January 15, 1999 to January 15, 2000. The total amount of DERCs estimated was 595 tons of NOx.

Discrete Emission Reductions Summary

The company claimed credit from additional control devices on 11 units. The company submitted the application on April 14, 2000. Dupont represented a total of 593 tons of NOx which was discounted to 589 tons due to an error in rounding.

The company was sent a deficiency letter on July 28, 2003 requesting additional information. An email was received September 30, 2003 explaining Dupont's inability to provide the necessary documentation to complete the application. The application will be voided.

Conclusion

The application will be voided because the company was not able to provide complete documentation to support their notice of DERC generation.


Project Reviewer Date 10/6/03

 11/5/03
Team Leader/Section Manager/Backup Date



FAX TRANSMITTAL

DATE: 9-29-03 NUMBER OF PAGES (including this cover sheet:

3

TO: Name

Mr. Richard H. Haar

Organization

El Dupont De Nemours + Co. Inc.

FAX Number

409-806-9333

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Name

Graciela Suárez

Division/Region

Office of Air Quality/NSR Division

Telephone Number

512-239-2990

FAX Number

512-239-1300 1323

NOTES:

Dear Mr. Haar:

Please send an email to: SSUN@tceq.state.tx.us
verifying your inability to submit the
necessary documentation requested in the letter
dated July 24, 2003. Thank you!

Sincerely,

Graciela Suárez

Air Permits Division, TCEQ.

July 24, 2003

Signed
Sent 7/28/03

Mr. Richard H Haar
Senior Engineer
Ei Dupont De Nemours & Company Inc
PO Box 1089
Orange, 77631-1089

Re: Administrative Review of Discrete Emission Reduction Credits
Review Of Registered Dercs
Orange, Orange County
Regulated Entity Number: OC-0007-J

Dear Mr Haar:

This letter is in response to your Form DEC-1, entitled "Notice of Generation and Generator Certification of Discrete Emission Credits," dated April 14, 2000. We are currently reviewing the 589 NO_x DERCs created during the generation period between January 15, 1999 and January 14, 2000. for creditability. In order complete our review we need the following documentation:

Documentation of hours of operation for each facility by month for the DERC generation period..

Supporting documentation of actual NO_x emission rate for each facility for the DERC generation period.

After receipt of all the additional information, we will continue the review of your request. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible.

Failure to submit all the requested information within 30 days of the date of this letter may result in the administrative voidance of your application. To reactivate the voided application, a new Form DEC-1 and all the information requested above will be required. Please be aware that in accordance to Title 30 Texas Administrative Code § 101.373(e)(1), an application must be submitted within 90 days after the end of the reduction strategy.

Mr. Richard H Haar

Page 2

July 24, 2003

Re: Administrative Review of Discrete Emission Reduction Credits

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 me at (512) 239-5218 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Clint Harper
Air Permits Division
Texas Commission on Environmental Quality

CH/pl

Enclosures

cc: Mr. Marion Everhart, Air Section Manager, Region 10 - Beaumont

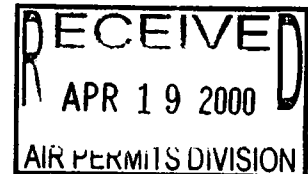
Project Number: 99580



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

April 14, 2000

Matthew Baker
Office of Permitting, Remediation, and Registration
Emissions Banking and Trading Program, MC 162
TNRCC
P.O. Box 13087
Austin, TX 78711-3087



Re: Application for 1999 Discrete Emission Reduction Credits (DERCs)

Dear Mr. Baker:

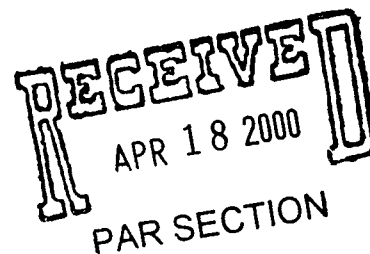
In response to 30 TAC 101.29, Dupont Sabine River Works (SRW) is submitting documentation for the Discrete Emission Reduction Credits (DERCs) generated from January 15, 1999 through January 14, 2000. SRW has been generating DERCs from various plant operations, but has failed to register them in the past. We are taking this opportunity to register credits from 1999 for three of our processes that control above that currently required under NOx RACT. Emission data and calculations are being submitted with this application. NOx credits generated by the facilities equal 595 tpy of DERCs.

If you have any questions, please call me at (409) 886-6773.

Sincerely,

April S. Hinson
Engineer - Environmental Technology

Attachments
Certified mail: 2257624036

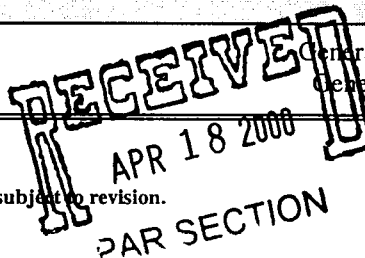




Form D-1 (Page 1)
Notice of Generation
of Discrete Emission Reduction Credits
(Title 30 Texas Administrative Code § 101.29)

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: E. I. duPont de Nemours & Company		
B. Owner or Operator of Generator Source: E. I. duPont de Nemours & Company		
C. Plant/Site Name: DuPont Sabine River Works		
D. Street Address: FM 1006		
E. Nearest City: Orange	F. Zip Code: 77631-1089	
G. County: Orange	H. Primary SIC: 2869	
I. TNRCC Account No.: TXD 008079652	J. Air Permit No.: OC-0007-J	
K. Telephone: 409-883-8411	L. Fax: 409-886-9333	
M. Mailing Address: P. O. Box 1089		
City: Orange	State: Texas	Zip Code: 77631-1089
II. TECHNICAL CONTACT IDENTIFYING INFORMATION		
A. Technical Contact Name: (☐ Mr. ☒ Mrs. ☐ Ms. ☐ Dr.) April Hinson <i>Ziet Harr</i>		
B. Technical Contact Title: Engineer <i>Richard. h. harr - 1 @ usa.dupont.com</i>		
C. Telephone: 409-886-6773	D. Fax: 409-886-9333	
E. Mailing Address: P. O. Box 1089		
F. City: Orange	State: Texas	Zip Code: 77631-1089
III. CONTACT FOR SALE OF CREDITS		
A. Contact Name: (☐ Mr. ☒ Mrs. ☐ Ms. ☐ Dr.) Rebecca Pietras		
B. Sale Contact Title: Environmental Superintendent		
C. Telephone: 409-886-6710	D. Fax: 409-886-9333	
E. Mailing Address: P. O. Box 1089		
F. City: Orange	State: Texas	Zip Code: 77631-1089
IV. SOURCE DESCRIPTION		
Generating emissions source: <u>Ethylene Boiler, Ethylene Heaters and Cogeneration Facility</u>		
Primary function: _____		
V. GENERATION PERIOD		
☒ 12 months		
☐ Other _____ Days/months		
Generation Period Start Date <u>1 / 15 / 1999</u>		Generation Period End Date <u>1 / 15 / 2000</u>





Form D-1 (Page 2)
Notice of Generation
of Discrete Emission Reduction Credits
(Title 30 Texas Administrative Code § 101.29)

VI. GENERATION ACTIVITY

☐ Shutdown ☒ Additional Control ☐ Other:

VII. EMISSIONS RATE DATA

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

If $SA > BA$, then: $(BER \cdot BA) - (SER \cdot SA) = \text{reduction}$

If $SA < BA$, then: $(BER \cdot BA) - (SER \cdot BA) = \text{reduction}$

Emission Point No.	FIN	Air Contaminant	Calculation of DERCs					DERCs (T)
			Baseline Activity (units)	Baseline Emission Rate (units)	Strategy Activity (units)	Strategy Emission Rate (units)	Most stringent emission rate (units)	
PK-1	PK-1	NOx	See attached spreadsheet					38
PK-2	PK-2	NOx	See attached spreadsheet					39
PK-3	PK-3	NOx	See attached spreadsheet					40
PK-4	PK-4	NOx	See attached spreadsheet					39
PK-5	PK-5	NOx	See attached spreadsheet					40
PK-6	PK-6	NOx	See attached spreadsheet					40

VIII. SHUTDOWN EMISSION REDUCTION STRATEGIES

Has production shifted from the shutdown facility to another facility in the same nonattainment area? ☐ Yes* ☒ No

*If Yes, DERC can not be claimed.

IX. VOC

List Specific Compounds reduced:

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

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Form D-1 (Page 3)
Notice of Generation
of Discrete Emission Reduction Credits
(Title 30 Texas Administrative Code § 101.29)

X. MOST STRINGENT EMISSION RATE

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

XI. PROTOCOL (Attach documentation, if appropriate)

Protocol used to calculate DERC: see attached sheet for DERC calculation sheet.

XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

I, GERALD R. EHMAN, hereby certify that the emission reductions claimed on this notice meet the requirements of 30 TAC §101.29 and are not based on an emission strategy prohibited in 30 TAC 101.29 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

Gerald R. Eelman

Signature Date

4/14/00

Title

PLANT MANAGER

Mail application to:

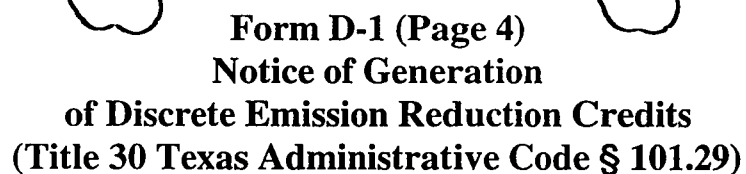
Emission Banking and Trading Program

TNRCC MC 162

PO BOX 13087

AUSTIN, TX 78711-3087

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PAR SECTION

[illegible]

Robert J. Huston, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Jeffrey A. Saitas, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

May 8, 2000

Ms. April Hinson
Engineer
E.I. duPont de Nemours & Company
P.O. Box 1089
Orange, Texas 77631-1089

Re: Administrative Review of Discrete Emission Reduction Credits
DuPont Sabine River Works
Orange, Orange County
Account ID No. OC-0007-J

Dear Ms. Hinson:

This will acknowledge receipt of your letter dated April 14, 2000 regarding the generation of Discrete Emission Reduction Credits (DERCs). We have determined that the information contained in your registration is complete. The following credits will be deposited in the TNRCC Emissions Registry:

Nitrogen Oxides 589 tons

This review verifies that all information needed for credit review has been received. However, the DERCs' actual credit has not yet been verified. Upon submittal of a notice of intent to use, the credits will be assigned to a technical engineer who will review the reductions for creditability. At that time, the credits may be adjusted accordingly.

Ms. April Hinson
Page 2
May 8, 2000

Re: Administrative Review of Discrete Emission Reduction Credits

Thank you for your cooperation in this matter. If you have questions concerning the review or this notice, call Mr. Cory Chism at (512) 239-0539 or write to him at Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087. If you need further assistance regarding the banking program or future transactions, please call me at (512) 239-1091 or write to me at 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 'MB', followed by a horizontal line extending to the right.

Matthew R. Baker
Emission Credit Trading Coordinator
Air Permits Division

MB/RC/jb

Record No. 72548

**Emission Reduction Credits (ERC) Verification
SOURCE ANALYSIS & TECHNICAL REVIEW**

Permit No: **M**
Project Type: **VDRC**
Record No: **72548**
Account No: **OC-0007-J**

Company: **E.I. duPont de Nemours & Company**
Facility Name: **DuPont Sabine River Works**
City: **Orange**
County: **Orange**

PROJECT OVERVIEW

E.I. duPont de Nemours has applied for DERC credits generated by additional controls on 11 units at their Sabine River Works plant for the period of January 15, 1999 to January 15, 2000. A total of 595 tons of NOx DERCs have been generated by controlling beyond permitted and/or RACT emission limits.

Emission Reductions Summary

DuPont Sabine River Works has added control devices to 9 ethylene cracking heaters (PK-1 through PK-6, PK-9, PK-10), an ethylene boiler (PK-7), and a gas turbine (11TRB-014) to attain emission rates below permitted and RACT limits. Permitted emission rates were the most stringent for all units except PK-7, ethylene boiler, which has a RACT requirement found in §117.205(b)(1)(C) that is below the permitted level. Actual emission rates for the ethylene cracking units and boiler were measured using CEMS data, actual emissions for the gas turbine were based on a 1996 stack test.

DERC credits were calculated by subtracting the actual emission rate from the most stringent emission rate limit (permit or RACT), multiplying by the yearly runtime, and converting to tons. Calculations for each unit were computed correctly. DuPont represented a total of 593 tons of NOx which was discounted to 589 tons due to an error in rounding.

Conclusion

DuPont has correctly represented an emission reduction of 589 tons of NOx DERCs.

 _____ Permit Engineer	5/4/00 _____ Date	 _____ Team Leader/Section Manager/Backup	5/4/00 _____ Date
---	-------------------------	---	-------------------------

Baseline activity - fuel usage,
heat input

BER - CEWS/PEMS

Summary data in
1b/MMBtu, Stack Test
report

SA - same as above

SEB - same as above

2 consecutive month Baseline
period.

Authorization & Authorization #

DuPont Sabine River Works
Discrete Emission Reduction Credits
January 15, 1999 - January 14, 2000

Unit ID	EPN	FIN	Hours of Operation 1/15/99 - 1/15/00	Permitted NOx Emission Limit lb/hr	NOx RACT Emission Limit lb/hr	Most Stringent NOx Emission Limit lb/hr	Actual NOx Emission Rate lb/hr	Actual NOx Emission Rate Basis	Discrete NOx Reductions lb/hr	NOx Reductions tpy
BA-100	PK-1	PK-1	7397	17.2 ✓	19.8	17.2	6.95	1	75,849	38 ✓ 57.91
BA-101	PK-2	PK-2	6881	17.2 ✓	19.8	17.2	5.78	1	78,567	39 ✓ 57.29
BA-102	PK-3	PK-3	7372	17.2 ✓	19.8	17.2	6.24	1	80,819	40 ✓ 40.40
BA-103	PK-4	PK-4	7239	17.2 ✓	19.8	17.2	6.45	1	77,798	39 ✓ 36.91
BA-104	PK-5	PK-5	7353	17.2 ✓	19.8	17.2	6.19	1	80,942	40 ✓ 40.48
BA-105	PK-6	PK-6	7372	17.2 ✓	19.8	17.2	6.27	1	80,576	40 ✓ 40.29
BA-106	PK-9	PK-9	6929	17.2 ✓	19.8	17.2	6.40	NOx CEMs	74,861	37 ✓ 37.42
BA-107	PK-10	PK-10	6428	17.2 ✓	19.8	17.2	5.46	1	75,490	38 ✓ 37.73
BA-108	PK-11	PK-11	7450	17.2 ✓	19.8	17.2	6.44	1	80,177	40 ✓ 40.08
Ethylene Boiler	PK-7	PK-7	7539	110.4 ✓	* 96.0 ✓	96.0	58.52	NOx CEMs	282,599	141 ✓ 141.28
CoGen	11TRB-014	11TRB014	8346	166 ✓	564.5	166.0	141.83	2	201,714	101 ✓ 100.86
* § 117.205(b)(1)(c)									Total Site Nox Reductions	595 593

1 Emission limits based on CEMs from unit with the same maximum capacity. CEMs data from one unit is taken and ratioed based on heat and fuel value to unit.
 2 Based on uptime and emission factor from 1996 stack test results.

RECEIVED
 APR 18 2000
 PAR SECTION



Facsimile Cover Sheet

Date: 4-26-00

To: Corey Chisem

Of: TNRCC - ERCs & DERCS

Phone: 512-239-0539

Fax: 512-239-1300

From: April Hinson

Of: **DuPont - Sabine River Works
Environmental Technology**

Phone: 409-886-6773

Fax: (409) 886-9333

Please call (409) 886-____ if the following 2 page(s), including cover, are not received.

Message:

Corey,
I set the precision as displayed in Excel,
and I think that fixed the problem. Let
me know if you have any more questions.
Thanks,
April

CONFIDENTIALITY NOTE

The documents accompanying this telecopy transmission contain information from DuPont which is confidential and/or legally privileged. The information is intended only for use of the individual or entity named on this transmission sheet. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited, and that the documents should be returned to DuPont immediately. In this regard, if you have received this telecopy in error, please notify us by telephone immediately so that we can arrange for the return of the original documents to us at no cost to you.

DuPont Sabine River Works
Discrete Emission Reduction Credits
January 15, 1999 - January 14, 2000

Unit ID	EPN	FIN	Hours of Operation 1/15/99 - 1/15/00	Permitted NOx Emission Limit lb/hr	NOx RACT Emission Limit lb/hr	Most Stringent NOx Emission Limit lb/hr	Actual NOx Emission Rate lb/hr	Actual NOx Emission Rate Basis	Discrete NOx Reductions lb/hr	NOx Reductions lpy
BA-100	PK-1	PK-1	7397	17.2	19.8	17.2	6.95	1	75,819	38 37
BA-101	PK-2	PK-2	6881	17.2	19.8	17.2	5.78	1	78,581	39
BA-102	PK-3	PK-3	7372	17.2	19.8	17.2	6.24	1	80,797	40
BA-103	PK-4	PK-4	7239	17.2	19.8	17.2	6.45	1	77,819	39 38
BA-104	PK-5	PK-5	7353	17.2	19.8	17.2	6.19	1	80,957	40
BA-105	PK-6	PK-6	7372	17.2	19.8	17.2	6.27	1	80,576	40
BA-106	PK-9	PK-9	6929	17.2	19.8	17.2	6.40	NOx CEMs	74,833	37
BA-107	PK-10	PK-10	6428	17.2	19.8	17.2	5.46	1	75,465	38 37
BA-108	PK-11	PK-11	7450	17.2	19.8	17.2	6.44	1	80,162	40
Ethylene Boiler	PK-7	PK-7	7539	110.4	96.0	96.0	58.52	NOx CEMs	282,562	141
CoGen	11TRB-014	11TRB014	8346	166	564.5	166.0	141.83	2	201,723	101 100
Total Site Nox Reductions										593

1 Emission limit is based on CEMs from unit with the same maximum capacity. CEMs data from one unit is taken and ratioed based on heat and fuel value to unit.
2 Based on uptime and emission factor from 1996 stack test results.

589