

[Return to Sharenet](#)**02/14/2018 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 412716      STATUS: P      DISP CODE: \_\_\_\_\_  
RECEIVED: 01/29/2018      PROJTYPE: BDIU      ISSUED DT: 02/14/2018  
SUP-DISP DATE:

**STAFF ASSIGNED TO PROJECT:**

MACKENZIE, KELLY

**PROJECT NOTES:**

.PROJECT ON HOLD 02/5/2018 TO GET FURTHER INFORMATION FROM AAR. SPOKE WITH AAR ON 02/07/2018 AND CONFIRMED USE OF D-3295 FOR 2018-2019 DERC CREDIT. EMAIL CONFIRMATION HAS ALSO BEEN SENT.

.INTENDED USE: 03/16/2018-03/15/2019

**PROJECT TRANSACTIONS****COMPANY DATA**

COMPANY NAME: AFTON CHEMICAL CORPORATION

CUSTOMER REGISTRY ID: CN604980136

**PORTFOLIO DATA**

NUMBER: P3760 NAME: AFTON CHEM CORP-LUBE &amp; FUEL ADD PLANT-RN101613230

**SITE DATA**

ACCOUNT: HG6831P

REG ENTITY ID: RN101613230

SITE NAME: AFTON LUBE AND FUEL ADDITIVES PLANT

COUNTY: HARRIS

NEAREST CITY: PASADENA

LOCATION: APPROX 1.5 MI N OF SH 225 &amp; PRESTON ST

**CONTACT DATA**

NAME: LISA TROWBRIDGE

TITLE: EHS

ROLE: AAAR

STREET: 1000 N. SOUTH AVE

CITY/STATE, ZIP: PASADENA, TX , 77503-

PHONE: 713-740-8371 -

EMAIL:

LISA.TROWBRIDGE@AFTONCHEMICAL.COM

NAME: BENOIT LAMARCHE

TITLE: EHS SPECIALIST

ROLE: AAR

STREET: PO BOX 3008

CITY/STATE, ZIP: PASADENA, TX , 77501-3008

PHONE: 713-740-8428 -

EMAIL:

BENOIT.LAMARCHE@AFTONCHEMICAL.COM

NAME: LISA TROWBRIDGE

TITLE: EHS

ROLE: TECHNICAL

STREET: 1000 N. SOUTH AVE

CITY/STATE, ZIP: PASADENA, TX , 77503-

PHONE: 713-740-8371 -

EMAIL:

LISA.TROWBRIDGE@AFTONCHEMICAL.COM

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_INTEN

DATE ENTERED: 2018-02-02 00:00:00.0

CONTAMINATE: **NOX**

DELETED DATE:

TONS: **0.30**

EFFECTIVE YEAR:

DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **D3295** COUNTY : **HARRIS****TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2018-02-02 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **NOX**TONS: **0.10**DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **D3351** COUNTY : **HARRIS**

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**TRACKING ACTIVITES**

PROJECT SUBMITTED : 01/22/2018 PM RECEIVED DATE : 02/02/2018

PROJECT HOLD : 02/05/2018 02/07/2018

PEER REVIEW : 02/07/2018 02/12/2018

TEAM LEAD REVIEW : 02/08/2018 02/14/2018 PROJECT COMPLETED : 02/14/2018

SECTION MANAGER  
REVIEW : 02/14/2018 02/14/2018

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### Portfolio Detail

**Portfolio Number:** P3760  
**Portfolio Name:** AFTON CHEM CORP-LUBE & FUEL ADD PLANT-RN101613230  
**Company Name:** AFTON CHEMICAL CORPORATION

### Actual Allowances for Pollutant NOX

Balance/Year	2015	2016	2017	2018	2019	2020	2021
Penalty from last year	0	0	0	0	0	0	0
Certified Allocation	0	0	0	0	0	0	0
Allowances for Offsets	-0	-0	-0	-0	-0	-0	-0
Future Trade In	0	0	0	0	0	0	0
Future Trade Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	0	0	0	0	0	0	0
Stream Traded Out	-0	-0	-0	-0	-0	-0	-0
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	0	0	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	-0	-0	-0	-0	-0	-0	-0
Vintage From Previous Year	0	0	0	0	0	0	0
Vintage Traded In	0	0	0	0	0	0	0
Vintage Traded Out	-0	-0	-0	-0	-0	-0	-0
Vintage Used for Compliance	-0	-0	-0	-0	-0	-0	-0
DERC Intent	0	0	0	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
<b>CURRENT ALLOWANCE BALANCE</b>	0	0	0	0	0	0	0
<b>VINTAGE ALLOWANCE BALANCE</b>	0	0	0	0	0	0	0

### Flexible Allowances for Pollutant NOX

Balance	2015	2016	2017	2018	2019	2020	2021
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0
Associated Annual Emissions	-0	-0	-0	-0	-0	-0	-0
<b>BALANCE</b>	0	0	0	0	0	0	0

**Sb7 Allowances for Pollutant NOX**

Balance/Year	2015	2016	2017	2018	2019	2020	2021
<b>Previous Year Deficit</b>	0	0	0	0	0	0	0
<b>Allowances Remaining from Previous Year</b>	0	0	0	0	0	0	0
<b>Allocation</b>	0	0	0	0	0	0	0
<b>Current Traded In</b>	0	0	0	0	0	0	0
<b>Current Traded Out</b>	-0	-0	-0	-0	-0	-0	-0
<b>Stream Traded In</b>	0	0	0	0	0	0	0
<b>Stream Traded Out</b>	-0	-0	-0	-0	-0	-0	-0
<b>Total Reported Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Remaining Balance</b>	0	0	0	0	0	0	0

**DERC >**

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
<a href="#">D3273</a>	NOX	0.70	DERC_INTEN	02/22/2017	08/01/1995	12/31/1997	BRAZORIA	D2541
<a href="#">D3228</a>	NOX	0.30	DERC_INTEN	07/17/2017	11/01/1997	10/31/1998	HARRIS	D3165
<a href="#">D3351</a>	NOX	0.10	DERC_RET	12/30/3000	08/01/1995	12/31/1997	BRAZORIA	D3295
<a href="#">D3295</a>	NOX	0.40	DERC_INTEN	12/30/3000	08/01/1995	12/31/1997	BRAZORIA	D3273
<a href="#">D3228</a>	NOX	0.30	DERC_BUY	07/17/2017	11/01/1997	10/31/1998	HARRIS	D3165
<a href="#">D3273</a>	NOX	0.70	DERC_BUY	02/22/2017	08/01/1995	12/31/1997	BRAZORIA	D2541
<a href="#">D3295</a>	NOX	0.40	DERC_RET	12/30/3000	08/01/1995	12/31/1997	BRAZORIA	D3273
<a href="#">D3274</a>	NOX	2.30	DERC_BUY	12/30/3000	11/01/1997	10/31/1998	HARRIS	D2925
<a href="#">D3228</a>	NOX	0.30	DERC_USE	07/17/2017	11/01/1997	10/31/1998	HARRIS	D3165

## Banking Cap and Trade

### Certificate Detail

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#### Detail Data for Certificate Num D3295

##### Detail Data for Certificate Num D3295

**Certificate Number:** **D3295**  
**Parent Certificate:** [D3273](#)  
**County Name:** BRAZORIA  
**End Date:** 12/30/3000  
**Gen Period Start Date:** 08/01/1995  
**Gen Period End Date:** 12/31/1997  
**Source:** POINT

##### Tons Quantity Pollutant Code

**0.40**
**NOX**

#### Children Detail Data for Certificate Num D3295

Certificate Num	Cont Code	Avail Tons	Active/Inactive	Original Cert Num	Parent Cert Num	Portfolio
<a href="#">D3351</a>	NOX	0.10	Active	D1005	D3295	AFTON CHEM CORP-LUBE & FUEL ADD PLANT-RN101613230

#### Portfolio Listing

Portfolio Num	Portfolio Name	Company Name	Summary	Fins List	Transactions List
P3760	<a href="#">AFTON CHEM CORP-LUBE &amp; FUEL ADD PLANT-RN101613230</a>	AFTON CHEMICAL CORPORATION	<a href="#">View Summary</a>	<a href="#">Fins List</a>	<a href="#">Xactions List</a>

## DISCRETE EMISSION CREDITS INTENT TO USE TECHNICAL REVIEW

Project No.:	412716	Customer Reference No.:	CN604980136
Project Type:	BDIU	Regulated Entity No.:	RN101613230
Company:	Afton Chemical Corporation	Facility Name:	Afton Lube and Fuel Additives Plant
City:	Pasadena	County:	Harris
Project Reviewer:	Kelly MacKenzie	Portfolio Number:	P3760

### Project Overview

Afton Chemical Corporation (Afton) submitted a Notice of Intent to Use Discrete Emission Credits application (Form DEC-2) on January 22, 2018 for the use period of March 16, 2018 through March 15, 2019. The Afton Lube and Fuel Additives Plant is located in Harris County within the Houston-Galveston-Brazoria (HGB) ozone nonattainment area.

Certificate to be set aside.....D-3295  
 Pollutant.....NO<sub>x</sub>  
 Amount.....0.3 ton  
 Regulation.....30 Texas Administration Code §117.2010(c)(1)(A)  
 Intent to Use Period.....03/16/2018 - 03/15/2019

### Discrete Emission Credit Intent to Use

The Afton Lube and Fuel Additive Plant has a heater, Facility Identification Number (FIN) X-C-1, which is subject to the Emission Specifications for Attainment Demonstration (ESAD) listed in §117.2010(c)(1)(A). The expected emission rate of 0.044 pound per million British thermal units (lb/MMBtu) for the heater is based on a stack test performed on August 20, 2008 (see Project number 408606 for stack test results). The ESAD is 0.036 lb/MMBtu. Because the emission rate is higher than the ESAD value, the company plans to use DERCs to account for the difference.

### Discrete Emission Credit Use Calculation Method

Based on 2017 fuel usage, Afton expects heater X-C-1 to use 40,178 thousand standard cubic feet (Mscf) of natural gas. Using an average natural gas heating value of 1,020 Btu/scf, the expected heat input is 40,982 MMBtu.

According to 30 TAC §101.376(d)(2)(B), DEC<sub>s</sub> = ELA x (EER - RER)

Where:

ELA = Expected Level of Activity

EER = Expected Emission Rate per unit activity

RER = Regulatory Emission Rate per unit activity

DEC<sub>s</sub> required = 40,982 MMBtu x (0.044 lb/MMBtu - 0.036 lb/MMBtu) ÷ 2,000 lb/ton

DEC<sub>s</sub> required = 0.164 ton; Rounded up to the nearest tenth of a ton = 0.2 ton

10% environmental contribution = 0.02 ton; Rounded up to the nearest tenth of a ton = 0.1 ton

Total DEC<sub>s</sub> required = 0.2 ton + 0.1 ton = 0.3 ton

### Conclusion

Afton has submitted all required documentation for this intent to use DERCs to be in compliance §117.2010(c)(1)(A). An amount of 0.3 ton of NO<sub>x</sub> DERCs will be set aside from certificate D-3295, valued at 0.4 ton. The remaining 0.1 ton of NO<sub>x</sub> DERCs from certificate D-3295, retained on certificate D-3351, has been deposited in the Texas Commission on Environmental Quality Discrete Emission Credit Registry for Afton's future use.



Receive

JAN 29 2018

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

Air Quality Division

412 716

P3760

**I. Company Identifying Information**

A. Company Name: **Afton Chemical Corporation**

Mailing Address: **P.O. Box 3008**

City: **Pasadena**

State: **TX**

Zip Code: **77501-3008**

Telephone: **(713) 740-8300**

Fax: **(713) 740-8310**

B. TCEQ Customer Number (CN): **CN604980136**

C. Site Name: **Afton Chemical Corporation - Lube and Fuel Additives Plant**

Street Address (If no street address, give driving directions to site)

**1000 N. South Street**

Nearest City: **Pasadena**

Zip Code: **77503-2516**

County: **Harris**

D. TCEQ Regulated Entity Number (RN): **RN101613230**

E. TCEQ Air Account Number: (if applicable) **HG-6831-P**

F. Primary SIC: **2869**

Air Permit Number: **18161**

**II. Technical Contact Identifying Information**

A. Technical Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.): **Benoît R. Lamarche**

Technical Contact Title: **EHS Specialist**

Mailing Address: **P.O. Box 3008**

City: **Pasadena**

State: **TX**

Zip Code: **77501-3008**

Telephone: **(713) 740-8428**

Fax: **(713) 740-8310**

E-mail: **benoit.lamarche@aftonchemical.com**

**III. Company Contact Identifying Information (If different from Technical Contact)**

A. Company Contact Name: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.): **Lisa Trowbridge**

Company Contact Title: **EHS Manager**

Mailing Address: **P.O. Box 3008**

City: **Pasadena**

State: **TX**

Zip Code: **77501-3008**

Telephone: **(713) 740-8371**

Fax: **(713) 740-8310**

E-mail: **Lisa.Trowbridge@AftonChemical.com**

**IV. 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

**V. Intended Use Period**

Intended Use Start Date: **03/16/2018**

Intended Use End Date: **03/15/2019**



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

**VI. State and Federal Requirements**

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

**30 TAC 117.2010(c)(1)(A); 30 TAC 117.9800(a)(6); 30 TAC 117.9200(2)(D)**

**VII. Most Stringent Emission Rate**

Describe basis for most stringent allowable emission rate:

☐ Permit: \_\_\_\_\_ ☐ RACT: \_\_\_\_\_ ☒ Other: **§117.2010(c)(1)(A)**

*Notes:*

**Regulatory NO<sub>x</sub> emission limit (0.036 lb/MMBtu) for gas-fired heaters located in an ozone non-attainment area at a minor NO<sub>x</sub> source.**

**VIII. Protocol**

Protocol used to calculate DERC:

**Emissions calculations are attached at the end of this package.**

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 3)**  
**Notice of Intent to Use Discrete Emission Credits**  
**(Title 30 Texas Administrative Code § 101.370 - § 101.379)**

<b>IX. Tons of DERCS Required</b>									
<b>Emission Point No.</b>	<b>FIN</b>	<b>Air Contaminant</b>	<b>Calculation of DERCS</b>						
			<b>Expected Activity (units)</b>	<b>Expected Emission Rate (units)</b>	<b>Expected Total Emissions (tons)</b>	<b>Regulated Activity (units)</b>	<b>Regulated Emission Rate (units)</b>	<b>Regulated Total Emissions (tons)</b>	<b>DERCs (tons)</b>
<b>X-C-1</b>	<b>X-C-1</b>	<b>NOx</b>	<b>40,982 (MMBtu)</b>	<b>0.044 (lb/MMBtu)</b>	<b>0.902 (tons)</b>	<b>40,982 (MMBtu)</b>	<b>0.036 (lb/MMBtu)</b>	<b>0.738 (tons)</b>	<b>0.164 (tons)</b>
								<b>Total:</b>	<b>0.164 (tons)</b>



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

**X. Total DERCS Required for Use (round up to the nearest tenth of a ton)**

Tons of DERCS required (from Sect. VII.)	CO: _____	NO <sub>x</sub> : <u>0.2</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : <u>0.1</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Compliance Margin (+ 5%) (If DERC use requires > 10 tons)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
<b>Total DERCS</b>	CO: _____	NO <sub>x</sub> : <u>0.3</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____

**XI. DERC Information**

Name of the DERC Generator: KM Liquids Terminals LLC

DERC Generator Regulated Entity Number: RN100237452

Certificate number of the DERCS acquired or to be acquired: ~~D-3273 and D-3274~~ D-3275

Date on which the DERCS were acquired or will be acquired: 12/21/2016

*Note: The certificate number is assigned by the TCEQ*

**XII. Certification by Responsible Official**

I, Benoît R. Lamarche, 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: B. Lamarche

Signature Date: 1/22/2018

Title: EHS Specialist

## Afton Chemical Corporation – Lube and Fuel Additives Plant

Company Number	CN604980136	Equipment	E-1614 Syltherm Heater
Regulated Entity Number	RN101613230	EPN	X-C-1
TCEQ Account Number	HG-6831-P		

### Estimated DERC Requirements (for DEC-2 preparation)

Use period: 03/16/2018 to 03/15/2019  
 Basis: NG Consumption For Similar Period of Prior Year

	Natural Gas Usage (MSCF estimate) <sup>1</sup>	MMBtu <sup>2</sup>	Emission Factor (NOx lb/MMBtu)	Tons per year
E-1614	40,178	40,982	0.044	0.902
Target			0.036	0.738
<b>Delta <sup>3</sup></b>				<b>0.164</b>
Estimated DERCs required				0.200
Minimum Environmental Contribution				0.100
<b>Total DERCs required for use</b>				<b>0.300</b>

(1) based on 2017 usage

(2) 1020 Btu/scf

**(3) must be covered by NOx DERCs**

1/22/2018

Afton Chemical Corporation  
PO BOX 3008  
PASADENA TX 77501-3008

US POSTAGE AND FEES PAID

FIRST-CLASS

Jan 22 2018

Mailed from ZIP 77501

1 oz First-Class Mail Letter



071S00777793

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**USPS CERTIFIED MAIL**



**9407 1108 9876 5004 4556 01**

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TCEQ

Emissions Banking and Trading Program - MC206

PO BOX 13087

AUSTIN TX 78711-3087



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FOLD ALONG THIS LINE



January 23, 2018

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Article No. 9407 1108 9876 5004 4556 01

Texas Commission on Environmental Quality  
Emissions Banking and Trading Program (MC 206)  
P. O. Box 13087  
Austin, TX 78711-3087

RE: TCEQ Form DEC-2 (Use Period: 03/16/2018 – 03/15/2019)  
Afton Chemical Corporation - Lube and Fuel Additives Plant; Pasadena, Harris County  
CN 604980136; RN101613230  
Account Number: HG-6831-P

Dear EB&T Team:

Afton Chemical Corporation (Afton) is submitting TCEQ Form DEC-2 (Notice of Intent to Use Discrete Emission Credits) pursuant to 30 TAC 101.376(d).

The attached Form DEC-2 represents the estimated (NOx) DERC use for the period of March 16, 2018 to March 15, 2019. The calculations used to develop the estimate are included.

A Form DEC-3 for the above referenced dates will be submitted following the end of the use period, as required by 30 TAC 101.376(e)(3).

If you have any questions regarding this submittal, or need additional information, please contact me (713-740-8428; [benoit.lamarche@aftonchemical.com](mailto:benoit.lamarche@aftonchemical.com)) or Lisa Trowbridge at (713-740-8371; [Lisa.Trowbridge@AftonChemical.com](mailto:Lisa.Trowbridge@AftonChemical.com)).

Sincerely,

A handwritten signature in blue ink that reads "B. Lamarche".

Benoit R. Lamarche  
Environmental, Health and Safety

Enclosures



# TCEQ Core Data Form

TCEQ Use Only

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input type="checkbox"/> Other
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in <b>Central Registry**</b>	3. Regulated Entity Reference Number (if issued)
CN 604980136		RN 101613230

## SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)		10/01/2015	
<input type="checkbox"/> New Customer <input type="checkbox"/> Update to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership					
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
<b>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</b>					
6. Customer Legal Name (If an individual, print last name first: e.g.: Doe, John)				If new Customer, enter previous Customer below:	
Afton Chemical Corporation				Ethyl Corporation	
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
0003069806		14309250885		430925088	
10. DUNS Number (if applicable)		05-396-9234			
11. Type of Customer:		<input checked="" type="checkbox"/> Corporation		<input type="checkbox"/> Individual	
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> State <input type="checkbox"/> Other		<input type="checkbox"/> Sole Proprietorship		Partnership: <input type="checkbox"/> General <input type="checkbox"/> Limited	
12. Number of Employees		<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		13. Independently Owned and Operated?	
				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check one of the following:					
<input checked="" type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Owner & Operator					
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> Voluntary Cleanup Applicant <input type="checkbox"/> Other:					
15. Mailing Address:					
P.O. Box 3008					
City: Pasadena State: TX ZIP: 77501 ZIP + 4: 3008					
16. Country Mailing Information (if outside USA)				17. E-Mail Address (if applicable)	
				erwin.rusli@aftonchemical.com	
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)	
( 713 ) 740 - 8300				( 713 ) 740 - 8310	

## SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)	
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input type="checkbox"/> Update to Regulated Entity Information	
<b>The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC).</b>	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
Afton Chemical Corporation - Lube and Fuel Additives Plant	



23. Street Address of the Regulated Entity: (No PO Boxes)	1000 N. South Street							
	City	Pasadena	State	TX	ZIP	77503	ZIP + 4	2516
24. County	Harris							

Enter Physical Location Description if no street address is provided.

25. Description to Physical Location:								
26. Nearest City					State		Nearest ZIP Code	
27. Latitude (N) In Decimal:			28. Longitude (W) In Decimal:					
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
29	44	06	95	10	10			
29. Primary SIC Code (4 digits)		30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
2869		4226		325199		325998		
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)								
Fuel and lube oil additives manufacturing								
34. Mailing Address:		P.O. Box 3008						
		City	Pasadena	State	TX	ZIP	77501	ZIP + 4
35. E-Mail Address:		Lisa.Trowbridge@AftonChemical.com						
36. Telephone Number			37. Extension or Code			38. Fax Number (if applicable)		
( 713 ) 740 - 8371						( 713 ) 740 - 8310		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

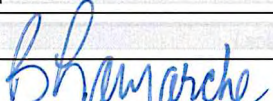
<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input checked="" type="checkbox"/> Emissions Inventory Air	<input checked="" type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input checked="" type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input checked="" type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input checked="" type="checkbox"/> Other: EBT

#### SECTION IV: Preparer Information

40. Name: Benoit R. Lamarche		41. Title: EHS Specialist	
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
( 713 ) 740 - 8428		( 713 ) 740 - 8310	benoit.lamarche@aftonchemical.com

#### SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Afton Chemical Corporation	Job Title:	EHS Specialist
Name(In Print):	Benoit R. Lamarche	Phone:	( 713 ) 740 - 8428
Signature:		Date:	1/23/2018

Questions or Comments &gt;&gt;

Main Query Page

Program Area Search

Regulated Entity Detail					
Regulated Entity Name:	AFTON LUBE AND FUEL ADDITIVES PLANT			RN:	RN101613230
Status:	Active	Status Comment:		Stand Alone:	N
Physical Address:	1000 N SOUTH ST PASADENA, TX 77503-2516			County:	HARRIS
Physical Location:	APPROX 1.5 MI N OF SH 225 & PRESTON ST				
Nearest City:	PASADENA	State:	TX	Zip Code:	77503
Latitude:	29° 44 min 0 sec (29.733333)		Longitude:	95° 10 min 0 sec (-95.166666)	

1-2 of 2 Records

Affiliated Customers						List All
CN Number	Customer*	Role	Begin Date	End Date	RE Comp Hist	
CN604980136	AFTON CHEMICAL CORPORATION	OWNER OPERATOR	10/1/2015	12/31/3000	SATISFACTORY	
CN600127740	ETHYL CORPORATION	OWNER OPERATOR	08/6/1996	12/31/3000	SATISFACTORY	

1-36 of 36 Records

Program Interests									
Program	RE Type	ID Type	Addn ID	Addn ID Status	Alt RE Name	Role	Customer Name (CN)	Begin Date - End Date	View 'Issued To' History
AIR EMISSIONS INVENTORY	SITE	ACCOUNT NUMBER	HG6831P	ACTIVE					<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	45551	ACTIVE	AFTON CHEMICAL HOUSTON PLANT	OWNER	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 09/30/2015	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	81723	CANCELLED	ETHYL LUBE ADDITIVES PLANT	OWNER	<a href="#">Ethyl Corporation (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	91719	CANCELLED	ETHYL LUBE ADDITIVES PLANT	OWNER	<a href="#">Ethyl Corporation (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	PERMIT	18161	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER	<a href="#">ETHYL CORPORATION (CN600127740)</a>	01/31/2008 - 09/30/2015	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	108205	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	02/12/2013 - 09/30/2015	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	123667	ACTIVE	AFTON CHEMICAL HOUSTON PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	09/25/2014 - 09/30/2015	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	133143	CANCELLED	AFTON CHEMICAL HOUSTON PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	06/09/2015 - 09/30/2015	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	123667	ACTIVE	AFTON CHEMICAL HOUSTON PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	108205	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	PERMIT	18161	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	133143	CANCELLED	AFTON CHEMICAL HOUSTON PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	45551	ACTIVE	AFTON CHEMICAL HOUSTON PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	137189	CANCELLED	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	11/18/2015 - 12/31/3000	<a href="#">View</a>
	SITE	REGISTRATION	139177	CANCELLED					<a href="#">View</a>



AIR NEW SOURCE PERMITS					AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	03/01/2016 - 12/31/3000	
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	<a href="#">139343</a>	CANCELLED	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	03/08/2016 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	<a href="#">139490</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	03/23/2016 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	<a href="#">144031</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	11/22/2016 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	<a href="#">148821</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/02/2017 - 12/31/3000	<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	ACCOUNT NUMBER	<a href="#">HG6831P</a>	CANCELLED					<a href="#">View</a>
AIR NEW SOURCE PERMITS	SITE	AFS NUM	<a href="#">4820101453</a>	ACTIVE					<a href="#">View</a>
AIR OPERATING PERMITS	SITE	PERMIT	<a href="#">1460</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 03/29/2010	<a href="#">View</a>
AIR OPERATING PERMITS	SITE	PERMIT	<a href="#">1460</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	03/30/2010 - 09/30/2015	<a href="#">View</a>
AIR OPERATING PERMITS	SITE	PERMIT	<a href="#">1460</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR OPERATING PERMITS	SITE	ACCOUNT NUMBER	<a href="#">HG6831P</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">AFTON CHEMICAL CORPORATION (CN604980136)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
AIR OPERATING PERMITS	SITE	ACCOUNT NUMBER	<a href="#">HG6831P</a>	ACTIVE	AFTON LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">Ethyl Corporation (CN600127740)</a>	10/01/2015 - 12/31/3000	<a href="#">View</a>
EMISSIONS BANKING AND TRADING	SITE								
TAX RELIEF	SITE	ID NUMBER	<a href="#">16000</a>	ACTIVE	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">Ethyl Corporation (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16001</a>	ACTIVE	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">Ethyl Corporation (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16002</a>	WITHDRAWN	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16003</a>	WITHDRAWN	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16004</a>	WITHDRAWN	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16005</a>	WITHDRAWN	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16006</a>	WITHDRAWN	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
TAX RELIEF	SITE	ID NUMBER	<a href="#">16007</a>	WITHDRAWN	LUBE ADDITIVES PLANT	OWNER OPERATOR	<a href="#">ETHYL CORPORATION (CN600127740)</a>	08/06/1996 - 12/31/3000	<a href="#">View</a>
UNDERGROUND INJECTION CONTROL	SITE	PERMIT	<a href="#">WDW086</a>	CANCELLED	ETHYL LUBE AND FUEL ADDITIVES PLANT	OWNER OPERATOR	<a href="#">Ethyl Corporation (CN600127740)</a>	12/18/2012 - 12/31/3000	<a href="#">View</a>

\*The Customer Name displayed may be different from the Customer Name associated with the Additional ID. This name may be different due to ownership changes, legal name changes, or other administrative changes.

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**From:** [Kelly Mackenzie](#)  
**To:** ["Lamarche, Benoit"](#)  
**Subject:** RE: Action Required by 03/07/2018: Request for Additional Information for Afton Lube and Fuel Additive Plant  
**Date:** Wednesday, February 07, 2018 10:03:00 AM

---

Dear Mr Lamarche,

Thank you so much for your phone call and for your email confirmation of wanting to use certificate D-3295 for the 2018-2019 DERC credits. I will add this information to your application. Also, thank you for getting back to me with the information that I requested so quickly. It is very much appreciated.

I spoke with one of my colleagues and if you are wanting to look at which certificates you have available, you are able to see this for each portfolio by going to the following website [http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt\\_dpa.start](http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start) and entering the portfolio number. For Afton Lube and Fuel Additives Plant, the portfolio number is P3760.

Please don't hesitate to contact me if you have any further questions.

Many thanks,

**Kelly MacKenzie**

Emissions Banking and Trading Program  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

Phone: (512) 239-4989  
Email: [Kelly.MacKenzie@TCEO.texas.gov](mailto:Kelly.MacKenzie@TCEO.texas.gov)

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**Sign up to receive e-mail updates** on EBT programs. Select *Emissions Banking and Trading (EBT) Program* under the *Air Quality* heading.

---

**From:** Lamarche, Benoit [mailto:[Benoit.Lamarche@AftonChemical.com](mailto:Benoit.Lamarche@AftonChemical.com)]  
**Sent:** Wednesday, February 07, 2018 9:55 AM  
**To:** Kelly Mackenzie <[Kelly.Mackenzie@tceq.texas.gov](mailto:Kelly.Mackenzie@tceq.texas.gov)>  
**Cc:** Trowbridge, Lisa <[Lisa.Trowbridge@AftonChemical.com](mailto:Lisa.Trowbridge@AftonChemical.com)>  
**Subject:** RE: Action Required by 03/07/2018: Request for Additional Information for Afton Lube and Fuel Additive Plant

Dear Ms. Mackenzie –

Per our conversation, **Afton wants to use certificate D-3295 for 2018-2019 DERC Credits.** Thank you for the clarifications and pointing the discrepancy to our attention.

The EBT notice for the creation of Certificate D-3295 is attached.

Regards,

---

Benoît R. Lamarche | Environmental, Health and Safety  
**Afton Chemical Corporation** | Pasadena TX 77503-2516  
[O] 713.740.8428 | [M] 346.302.6298  
[benoit.lamarche@aftonchemical.com](mailto:benoit.lamarche@aftonchemical.com)

---

**From:** Kelly Mackenzie [<mailto:Kelly.Mackenzie@tceq.texas.gov>]  
**Sent:** Monday, February 5, 2018 16:33  
**To:** Lamarche, Benoit <[Benoit.Lamarche@AftonChemical.com](mailto:Benoit.Lamarche@AftonChemical.com)>  
**Cc:** Trowbridge, Lisa <[Lisa.Trowbridge@AftonChemical.com](mailto:Lisa.Trowbridge@AftonChemical.com)>  
**Subject:** Action Required by 03/07/2018: Request for Additional Information for Afton Lube and Fuel Additive Plant

Dear Mr. Lamarche:

This e-mail is in response to the DERC Notice of Intent submitted to the Texas Commission on Environmental Quality (TCEQ) on January 22, 2018 (EBT Project Number 412716) for Afton Chemical Corporation (CN604980136), Afton Lube and Fuel Additive Plant (RN101613230). The following item(s) are required before we can process your project:

1. On your recent DERC Notice of Intent application, you asked that DERC Certificate D-3273 and D-3274 be used for your 2018-2019 DERC credits. Certificate D-3273 is not able to be used as it had 0.3 ton set aside for DERC use in 2017-2018 and the remaining 0.4 ton was allocated to DERC certificate D-3295. Would you like to use certificate D-3295 for the 2018-2019 DERC Notice of Intent? Or, would you like to use Certificate D-3274 or a different certificate number?

Please provide this information by 03/07/2018 or contact me by this date to ask for an extension. If a response is not received within 30 calendar days of this email, or if you request an extension of more than 30 days to provide the requested items, the review of your application will be suspended until we receive the information.

Please contact me if you have any questions.

Sincerely,

**Kelly MacKenzie**

Emissions Banking and Trading Program  
Texas Commission on Environmental Quality  
Air Quality Division, MC 206  
PO Box 13087  
Austin, TX 78711-3087

Phone: (512) 239-4989

Email: [Kelly.MacKenzie@TCEO.texas.gov](mailto:Kelly.MacKenzie@TCEO.texas.gov)

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Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Jon Niermann, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 14, 2018

Mr. Benoit Lamarche  
EHS Specialist  
Afton Chemical Corporation  
PO Box 3008  
Pasadena, Texas 77501  
Via email: benoit.lamarche@aftonchemical.com

Re: Notice of Intent to Use Discrete Emission Credits  
Afton Chemical Corporation  
Afton Lube and Fuel Additives Plant  
Customer Number: CN604980136  
Regulated Entity Number: RN101613230  
EBT Portfolio Number: P3760  
Project Number: 412716

Dear Mr. Lamarche:

In response to your Notice of Intent to Use Discrete Emission Credits submitted on January 22, 2018, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for the purpose of compliance with §117.2010(c)(1)(A). A Notice of Use of Discrete Emission Credits application must be submitted within 90 days after the end of the use period.

Pollutant	Set Aside Certificate	Intent Amount (tons)	Use Period	Retained Certificate	Amount Retained (tons)
NO <sub>x</sub>	D-3295	0.3	03/16/2018- 03/15/2019	D-3351	0.1

Additional information regarding this project and the site's portfolio is available online at [http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt\\_dpa.start](http://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start). If you have questions concerning this project or the Emissions Banking and Trading program, please contact Kelly MacKenzie at (512) 239-4989 or [Kelly.MacKenzie@tceq.texas.gov](mailto:Kelly.MacKenzie@tceq.texas.gov), or write to the TCEQ, Office of Air, Air Quality Division, MC-206, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the executive director of the TCEQ.

Sincerely,

A handwritten signature in black ink that reads "David Brymer".

David Brymer, Director  
Air Quality Division

cc: Air Section Manager, Region 12 - Houston  
Mr. Bob Allen, Director, Harris County Pollution Control Services Department  
Ms. Martha O' Daniel, Chief Health Inspector, Health Department, City of Pasadena  
Ms. Lisa Trowbridge, EHS Manager, Afton Chemical Corporation, Pasadena