

[Return to Sharenet](#)**06/20/2018 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 413244 STATUS: C DISP CODE: _____
RECEIVED: 06/06/2018 PROJTYPE: BERR ISSUED DT: 06/20/2018
SUP-DISP DATE: 06/20/2018

STAFF ASSIGNED TO PROJECT:

CALVIN, DENINE

PROJECT NOTES:

.AMEREX SUBMITTED TWO EC-2 APPLICATIONS; HOWEVER ALL OF THE CERTIFICATES ON THESE APPLICATIONS WERE GENERATED THROUGH THE SAME ERC GENERATION PROJECT, 411369. FOR THIS REASON, THESE APPLICATIONS HAVE BEEN COMBINED INTO ONE PROJECT. (MR)

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: AMEREX BROKERS LLC
CUSTOMER REGISTRY ID:

PORTFOLIO DATA

NUMBER: P3493 NAME: AMEREX BROKERS LLC - BKR1046

SITE DATA

ACCOUNT: BKR1046
REG ENTITY ID:
SITE NAME: BROKER ACCOUNT - AMEREX BROKERS LLC
COUNTY: NEAREST CITY:
LOCATION:

CONTACT DATA

NAME: AMALIA BERRIOS TITLE: VP/SR. COUNSEL
ROLE: AAR
STREET: 1 SUGAR CREEK CENTER BOULEVARD,
SUITE 700
CITY/STATE, ZIP: SUGAR LAND, TX , 77478-
PHONE: 281-340-5212 -
EMAIL: ABERRIOS@AMEREXENERGY.COM

NAME: KELLY COVINGTON TITLE: Emissions Broker/Consultant
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-808-3503 -
EMAIL: KCOVINGTON@AMEREXENERGY.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RRVW
DATE ENTERED: 2018-06-08 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: VOC TONS: 0 DOLLARS: 0
ALLOWANCE 0 CERTIFICATE NO.: 0 COUNTY :

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY
CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K

REG ENTITY ID: RN100225085

SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT

COUNTY: HARRIS

NEAREST CITY: LA PORTE

LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
610. TAKE EXIT SENS/STRANG AND TURN LEFT AT THE
TRAFFIC LIGHT. CROSS THE OVERPASS AND CONTINUE
ON SENS ROAD. TURN RIGHT ONTO STRANG AND
CONTINUE TO THE END OF STRANG ROAD.

CONTACT DATA

NAME: THUY T.MAI

TITLE: Senior Environmental Engineer

ROLE: AAAR

STREET:

CITY/STATE, ZIP:

PHONE: 281-470-3150 -

EMAIL: THUY.T.MAI@DUPONT.COM

NAME: R. ALEX ATOR

TITLE: PLANT MANAGER

ROLE: AAR

STREET: PO BOX 347

CITY/STATE, ZIP: LA PORTE, TX , 77572-0347

PHONE: 281-470-3211 -

EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2018-06-12 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **NOX**

TONS: **0.30**

DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **3225** COUNTY : **HARRIS**

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY

CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K

REG ENTITY ID: RN100225085

SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT

COUNTY: HARRIS

NEAREST CITY: LA PORTE

LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
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TITLE: Senior Environmental Engineer

ROLE: AAAR

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ROLE: AAR

STREET: PO BOX 347

CITY/STATE, ZIP: LA PORTE, TX , 77572-0347

PHONE: 281-470-3211 -

EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2018-06-12 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **NOX** TONS: **1.20** DOLLARS: **0**
ALLOWANCE0 CERTIFICATE NO.: **3226** COUNTY : **HARRIS**

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY
CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K
REG ENTITY ID: RN100225085
SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT
COUNTY: HARRIS NEAREST CITY: LA PORTE
LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
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CONTINUE TO THE END OF STRANG ROAD.

CONTACT DATA

NAME: THUY T.MAI TITLE: Senior Environmental Engineer
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-470-3150 -
EMAIL: THUY.T.MAI@DUPONT.COM

NAME: R. ALEX ATOR TITLE: PLANT MANAGER
ROLE: AAR
STREET: PO BOX 347
CITY/STATE, ZIP: LA PORTE, TX , 77572-0347
PHONE: 281-470-3211 -
EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2018-06-12 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **VOC** TONS: **0.10** DOLLARS: **0**
ALLOWANCE0 CERTIFICATE NO.: **3227** COUNTY : **HARRIS**

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY
CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K
REG ENTITY ID: RN100225085
SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT
COUNTY: HARRIS NEAREST CITY: LA PORTE
LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
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CONTACT DATA

NAME: THUY T.MAI TITLE: Senior Environmental Engineer
ROLE: AAAR
STREET:

CITY/STATE, ZIP:
PHONE: 281-470-3150 -
EMAIL: THUY.T.MAI@DUPONT.COM

NAME: R. ALEX ATOR TITLE: PLANT MANAGER
ROLE: AAR
STREET: PO BOX 347
CITY/STATE, ZIP: LA PORTE, TX , 77572-0347
PHONE: 281-470-3211 -
EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2018-06-12 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **VOC** TONS: **2.30** DOLLARS: **0**
ALLOWANCE **0** CERTIFICATE NO.: **3228** COUNTY : **HARRIS**

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY
CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K
REG ENTITY ID: RN100225085
SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT
COUNTY: HARRIS NEAREST CITY: LA PORTE
LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
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CONTINUE TO THE END OF STRANG ROAD.

CONTACT DATA

NAME: THUY T.MAI TITLE: Senior Environmental Engineer
ROLE: AAAR
STREET:
CITY/STATE, ZIP:
PHONE: 281-470-3150 -
EMAIL: THUY.T.MAI@DUPONT.COM

NAME: R. ALEX ATOR TITLE: PLANT MANAGER
ROLE: AAR
STREET: PO BOX 347
CITY/STATE, ZIP: LA PORTE, TX , 77572-0347
PHONE: 281-470-3211 -
EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2018-06-12 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **VOC** TONS: **0.70** DOLLARS: **0**
ALLOWANCE **0** CERTIFICATE NO.: **3229** COUNTY : **HARRIS**

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY
CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K

REG ENTITY ID: RN100225085

SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT

COUNTY: HARRIS

NEAREST CITY: LA PORTE

LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
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NAME: THUY T.MAI

TITLE: Senior Environmental Engineer

ROLE: AAAR

STREET:

CITY/STATE, ZIP:

PHONE: 281-470-3150 -

EMAIL: THUY.T.MAI@DUPONT.COM

NAME: R. ALEX ATOR

TITLE: PLANT MANAGER

ROLE: AAR

STREET: PO BOX 347

CITY/STATE, ZIP: LA PORTE, TX , 77572-0347

PHONE: 281-470-3211 -

EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2018-06-12 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **VOC**

TONS: **0.10**

DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **3230** COUNTY : **HARRIS**

COMPANY DATA

COMPANY NAME: E I DU PONT DE NEMOURS AND COMPANY

CUSTOMER REGISTRY ID: CN600128284

PORTFOLIO DATA

NUMBER: P1785 NAME: E I DU PONT DE NEMOURS LA PORTE PLANT- RN100225085

SITE DATA

ACCOUNT: HG0218K

REG ENTITY ID: RN100225085

SITE NAME: E I DU PONT DE NEMOURS LA PORTE PLANT

COUNTY: HARRIS

NEAREST CITY: LA PORTE

LOCATION: GO EAST ON HIGHWAY 225 FROM EAST LOOP
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CONTACT DATA

NAME: THUY T.MAI

TITLE: Senior Environmental Engineer

ROLE: AAAR

STREET:

CITY/STATE, ZIP:

PHONE: 281-470-3150 -

EMAIL: THUY.T.MAI@DUPONT.COM

NAME: R. ALEX ATOR

TITLE: PLANT MANAGER

ROLE: AAR

STREET: PO BOX 347

CITY/STATE, ZIP: LA PORTE, TX , 77572-0347

PHONE: 281-470-3211 -

EMAIL: R-ALEX.ATOR@DUPONT.COM

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET

DATE ENTERED: 2018-06-12 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **VOC**TONS: **5.00**DOLLARS: **0**ALLOWANCE**0**CERTIFICATE NO.: **3231** COUNTY : **HARRIS**

TRACKING ACTIVITES

PROJECT SUBMITTED : 06/04/2018 PM RECEIVED DATE : 06/08/2018

TEAM LEAD REVIEW : 06/12/2018 06/20/2018

PROJECT COMPLETED : 06/20/2018 SECTION MANAGER
REVIEW : 06/20/2018 06/20/2018

Emission Reduction Credit (ERC) Creditability Technical Review

Project Number:	413244	Project Manager:	Denine Calvin
Customer Reference No.:	NA	Company Name:	Amerex Brokers LLC
Broker Account Number:	BKR1046	Site Name:	Broker Account
Portfolio Number:	P3493	County:	NA

Project Overview

Amerex Brokers LLC submitted a Creditability Review of Emissions Credits application on June 4, 2018 for the review of NO_x ERC certificate numbers 3225 (0.3 tpy) and 3226 (1.2 tpy) and VOC certificate numbers 3227 (0.1 tpy), 3228 (2.3 tpy), 3229 (0.7 tpy), 3230 (0.1 tpy), and 3231 (5.0 tpy).

ERC Creditability

Certificates 3225, 3226, 3227, 3228, 3229, 3230, and 3231

Originator certificates 3225, 3226, 3227, 3228, 3229, 3230, and 3231 were all generated by EI DuPont de Nemours and Company (RN100225085) in Project 411369 from the permanent shutdown of the Herbicide Business Unit. Separate generator certificates were issued based on the reduction dates of applicable FINs. The credits expire on 08/20/2021 (3225), 08/31/2021 (3226 and 3230), 06/02/2020 (3227), 06/04/2020 (3228), 08/11/2020 (3229), and 09/26/2021 (3231).

Table 1 below lists the regulations that were evaluated in this project. There have been no new regulatory provisions that would have affected the facilities since project 411369 and the submission of this creditability review project. Therefore, the certificates listed still retain the certified amount of 1.5 tpy of NO_x and 8.2 tpy of VOC (cumulative) and the full amounts are available.

Table 1: Regulatory Review

FIN	Certificate(s)	Citations and Regulations	Verified	Last Revision Date
VP-01AC	3226 3230	30 TAC §111.111(a)(4)	Complied with the visible emission requirements in Chapter 111. There are currently no VOC limits established.	07/23/1993
VP-01AC	3226 3230	30 TAC §117.303(a)(4)	Exempt, flares do not require NO _x controls.	06/14/2007
VP-01AC	3226 3230	40 CFR Part 63 Subpart A	Complied with the opacity, net heating value, and velocity specifications as required by the applicable MACT (Part 63 Subpart MMM).	03/16/1994
VP-01BC	3225	30 TAC §111.111(a)(4)	Complied with the visible emission requirements in Chapter 111. There are currently no VOC limits established.	07/23/1993
VP-01BC	3225	30 TAC §117.303(a)(4)	Exempt, flares do not require NO _x controls.	06/14/2007

FIN	Certificate(s)	Citations and Regulations	Verified	Last Revision Date
VP-01BC	3225	40 CFR Part 63 Subpart A	Complied with the net heating value and velocity specifications as required by the applicable MACT (Part 63 Subpart FFFF).	03/16/1994
UC-02P	3229	30 TAC §115.121(a)(1)	Complied with the Vent Gas Control requirements with a control efficiency of at least 90%.	06/25/2015
UC-02P	3229	40 CFR Part 63 Subpart FFFF	Complied with requirements by reducing the total HAP emissions by at least 98%.	11/10/2003
VP-01P-2	3227	30 TAC §115.121(a)(1)	Complied with the Vent Gas Control requirements with a control efficiency of at least 90%.	06/25/2015
VP-01P-2	3227	40 CFR Part 63 Subpart MMM	Complied with requirements by reducing the total HAP emissions by at least 98%.	03/27/2014
VP-03P-5	3228	30 TAC §115.121(a)(1)	Complied with the Vent Gas Control requirements with a control efficiency of at least 90%.	06/25/2015
VP-03P-5	3228	40 CFR Part 63 Subpart MMM	Complied with requirements by reducing the total HAP emissions by at least 98%.	03/27/2014
VP-05F	3231	40 CFR Part 63 Subpart MMM	Complied with monitoring requirements specified for Velpart process equipment in HAP Service.	03/27/2014
VP-05F	3231	40 CFR Part 63 Subpart EEEE	Complied with the monitoring requirements for organic loading rack equipment in HAP Service.	07/28/2006
VP-05F	3231	40 CFR Part 63 Subpart FFFF	Complied with the monitoring requirements specified for NaOMe process equipment in HAP Service.	11/10/2003
All FINs	NA	Permit 2446A	Permit 2446A was voided on 09/09/2016	09/09/2016
All FINs	NA	FOP O1905	Federal Permit was voided on 03/06/2017	03/06/2017

Conclusion

From this review it has been determined that, as of June 20, 2018, the ERCs on certificate(s) 3225, 3226, 3227, 3228, 3229, 3230, and 3231 have not devalued.



Texas Commission on Environmental Quality **Received**
Form EC-2
Creditability Review for Emission Credits **JUN - 6 2018**
(Title 30 Texas Administrative Code § 101.300, § 101.304)
Air Quality Division

I. REQUESTOR INFORMATION

A. Company Name: Amerex Brokers, LLC

Mailing Address: 1 Sugar Creek Center Blvd # 700

City: Sugar Land

State: TX

Zip Code: 77478

B. Contact Name: David DeVooght

Telephone: 281-340-8010

Fax: 281-340-5266

II. EMISSION CREDIT OWNER INFORMATIONA. Company Name: EI Du Pont De Nemours and Company

B. Nonattainment area: HGB

C. Contact Name: Alex Ator

Telephone: 281-470-3211

Fax:

III. EMISSION CREDIT CERTIFICATES TO BE REVIEWED

Certificate No.:	3226	Exp. Date:	8/31/2021	TPY VOC:		TPY NO _x :	1.20
Certificate No.:	3227	Exp. Date:	6/02/2020	TPY VOC:	0.10	TPY NO _x :	
Certificate No.:	3228	Exp. Date:	6/04/2020	TPY VOC:	2.30	TPY NO _x :	
Certificate No.:	3229	Exp. Date:	8/11/2020	TPY VOC:	0.70	TPY NO _x :	

IV. EMISSION RATE RULE AND REGULATION CHANGES

List any state or federal rules and regulations that have changed since these ERCs were last reviewed which could affect the creditability of the reduction:

V. SIGNATURE

I, David DeVooght, hereby certify that the information entered in this application is correct to the best of my knowledge and belief and understand that the emission reduction credits listed above may devalue upon review of their creditability per 30 TAC Chapter 101, Subchapter H, Division 1.

Signature

Signature Date

Title

Mail application to:
 Texas Commission on Environmental Quality
 Emission Banking and Trading Program MC 206
 PO BOX 13087
 AUSTIN, TX 78711-3087



Texas Commission on Environmental Quality
Form EC-2
Creditability Review for Emission Credits
 (Title 30 Texas Administrative Code § 101.300 - § 101.304) **Received**
June 6 2018

Air Quality Division

I. REQUESTOR INFORMATION

A. Company Name: Amerex Brokers, LLC

Mailing Address: 1 Sugar Creek Center Blvd # 700

City: Sugar Land

State: TX

Zip Code: 77478

B. Contact Name: David DeVooght

Telephone: 281-340-8010

Fax: 281-340-5266

II. EMISSION CREDIT OWNER INFORMATION

A. Company Name: E I DU PONT DE NEMOURS AND COMPANY

B. Nonattainment area: HGB

C. Contact Name: Alex Ator

Telephone: 281-470-3211

Fax:

III. EMISSION CREDIT CERTIFICATES TO BE REVIEWED

Certificate No.:	3230	Exp. Date:	8/31/2021	TPY VOC:	0.10	TPY NO _x :	
Certificate No.:	3231	Exp. Date:	9/26/2021	TPY VOC:	5.00	TPY NO _x :	
⊗ Certificate No.:	3225	Exp. Date:	8/20/2021	TPY VOC:		TPY NO _x :	0.30
Certificate No.:		Exp. Date:		TPY VOC:		TPY NO _x :	

⊗ moved from project # 413245. David DeVooght was notified on

IV. EMISSION RATE RULE AND REGULATION CHANGES

6/8/2018 MB

List any state or federal rules and regulations that have changed since these ERCs were last reviewed which could affect the creditability of the reduction:

V. SIGNATURE

I, David DeVooght, hereby certify that the information entered in this application is correct to the best of my knowledge and belief and understand that the emission reduction credits listed above may devalue upon review of their creditability per 30 TAC Chapter 101, Subchapter H, Division 1.

Signature

Signature Date

6/4/18

Title

Analyst

Mail application to:
 Texas Commission on Environmental Quality
 Emission Banking and Trading Program MC 206
 PO BOX 13087
 AUSTIN, TX 78711-3087

Tech Review for ERC Generation related to all 7 certificates.

Point and Area Source Emission Reduction Credit (ERC) Certification Project

Technical Review

Latest Update: 04/13/2018

Project No.:	411369	Project Manager:	Marie Mercado, P.E.
Customer Reference No.:	CN600128284	Company Name:	E.I. DuPont de Nemours and Company
Regulated Entity Reference No:	RN100225085	Site Name:	E.I. DuPont de Nemours La Porte Plant
Portfolio Number:	P1785	County:	Harris

I. Summary

Project Status	Pending
ERC Certificate Details	<p>3230 - 0.1 tpy VOC ERCs, Expiration Date: 08/31/2021</p> <p>3227 - 0.1 tpy VOC ERCs, Expiration Date: 06/02/2020</p> <p>3228 - 2.3 tpy VOC ERCs, Expiration Date: 06/04/2020</p> <p>3229 - 0.7 tpy VOC ERCs, Expiration Date: 08/11/2020</p> <p>3231 - 5.0 tpy VOC ERCs, Expiration Date: 09/26/2021</p> <p>3226 - 1.2 tpy NO_x ERCs, Expiration Date: 08/31/2021</p> <p>3225 - 0.3 tpy NO_x ERCs, Expiration Date: 08/20/2021</p>
Source Type	Point
Key Points of Review	<p>Company originally requested 17.42 and 1.63 tpy of VOC and NO_x ERCs, respectively. After revisions were made to project to remove ineligible facilities and limit baseline emissions to the EI reported values, the generation amounts are 8.2 and 1.5 tpy of VOC and NO_x ERCs, respectively.</p> <p>FIN VP-03P-5 exceeded the values reported to EI for both historical emissions years. FIN VP-05F and VP-01BC exceeded the values reported to EI for the 2012 baseline year.</p> <p>FINs VP-01P-2, VP-03P-5, VP-05F exceeded the permit limits at the time of reduction (2015 MAERT) for the SIP year. The SIP emissions values were adjusted but it did not impact the generation amount.</p>

II. Project Eligibility

✓	Review	Notes
<input checked="" type="checkbox"/>	Ensure application was submitted by credit application deadline: two years after the emission reduction date with some exceptions under 30 Texas Administrative Code §101.303 .	Submitted on 09/26/2016; Earliest shutdown date provided 06/02/2015. See Attachment B: Supporting Documentation for Process Shutdown Dates
<input checked="" type="checkbox"/>	Ensure reduction strategy is allowed per §101.303 .	Shutdown of Herbicide Business Unit
<input type="checkbox"/>	Ensure the source is not in an ineligible generator category per §101.302 .	N/A - Point Source
<input type="checkbox"/>	For area sources, ensure the facilities were actually operated during the SIP emissions year (from the current SIP or, for HGB, the prior SIP as allowed under the modeling sensitivity analysis)	N/A - Point Source

III. Completeness Review

✓	Review to ensure the following are provided	Notes
<input checked="" type="checkbox"/>	Company and site information <ul style="list-style-type: none"> Ensure it is consistent with Central Registry. If not, refer to Change in Name/Ownership document for assistance. 	Reviewed Central Registry. Copy of Central Registry page is included in ERC Generation file.
<input checked="" type="checkbox"/>	Authorized Account Representative (AAR) <ul style="list-style-type: none"> If the AAR is not in the Information Management System (IMS), request that the company update IMS through the State of Texas Environmental Electronic Reporting System (STEERS) or submit an AAR Registration Form. 	Alternate AAR Thuy T. Mai certified the form.
<input checked="" type="checkbox"/>	Description of the facilities in the application (FIN, unit size, heat input, kwh, horsepower, etc.)	Company provided missing information on 08/01/2017.
<input checked="" type="checkbox"/>	Description of the emission reduction	Shutdown of Herbicide Business Unit
<input checked="" type="checkbox"/>	Documentation supporting the emission reduction date	Various reduction dates provided in Correspondence dated 3/15/2017. FIN VP-01AC: 08/31/2016 FIN VP-01BC: 08/20/2016 FIN UC-02P: 08/11/2015 FIN VP-01P-2: 06/02/2015 FIN VP-03P-5: 06/04/2015 FIN VP-05F: 09/26/2016
<input checked="" type="checkbox"/>	Requested amount of ERCs and proposed two consecutive baseline years	2012 and 2013 8.6 tpy of VOC 1.5 tpy of NO _x
<input checked="" type="checkbox"/>	Site/facility-specific speciated Volatile Organic Compounds (VOC) list for VOC ERC applications	Provided on page 4 of 1441 of Correspondence dated 03/15/2017.
<input checked="" type="checkbox"/>	Description of emission quantification protocol	See Correspondence dated 08/01/2017, page 11 of 1381.
<input checked="" type="checkbox"/>	Documentation supporting the level of activity, emission rate, historical adjusted emissions, SIP emissions, baseline emissions, and strategic emissions	
<input checked="" type="checkbox"/>	Calculations to determine the requested amount of ERCs	FIN VP-01AC: Page 13 of 1441 (Tab FINs VP-01AC & VP-01BC 2006 Calc) and Appendix D and Attachment I FIN VP-01BC: Page 13 of 1441 (Tab FINs VP-01AC & VP-01BC 2006 Calc), Attachments G-1 and G-2 FIN VP-01P-2: Attachments K and A FIN VP-03P-5: Appendices B and E FIN UC-02P: Attachments E-1, E-2, and E-3 FIN VP-05F: Appendices K and D
<input checked="" type="checkbox"/>	List of applicable rules/authorizations showing how each applies to each facility	See Correspondence dated 08/01/2017, page 2 and 3 of 1381 and Attachments E, F, G, and H.
<input checked="" type="checkbox"/>	The most stringent emission rate and emission limit for each facility	Most stringent emissions rates are based on permit 2446A.

✓	Review to ensure the following are provided	Notes
<input checked="" type="checkbox"/>	Applicant confirmed that no shifting of activity is occurring	Company confirmed that there was no shifting of activity in the Correspondence dated 08/01/2017, page 1 of 1381.
<input checked="" type="checkbox"/>	Explanation of how real, surplus, quantifiable, permanent, and enforceable criteria are met	Company provided explanation in Correspondence dated 08/01/2017, pages 1 and 2 of 1381.

IV. Source Characterization

✓	Review	Notes
<input checked="" type="checkbox"/>	<p>Determine if the site is an area or point source as defined in §101.300 using the applicable Point Source SIP Emissions file located on the H Drive at: H:\EBT\SIP Emissions.</p> <ul style="list-style-type: none"> To be a point source, the site and specific facilities (RN and FIN/EPN) must be in the Point Source SIP Emissions file for the applicable nonattainment area. If not, it is an area source. To be an area source, the source's emissions must not have exceeded the Emissions Inventory reporting thresholds in §101.10 during the SIP emissions year. If they did, it is a non-compliant point source. 	Point Source - HGB 2006 SIP
<input checked="" type="checkbox"/>	<p>Determine if site is or should be in Mass Emissions Cap and Trade (MECT), Highly Reactive Volatile Organic Compounds (HRVOC) Cap and Trade (HECT) program, and/or Emissions Banking and Trading Allowances (EBTA) program.</p> <ul style="list-style-type: none"> Ensure that the site is in compliance with EBT programs. 	Site in MECT and HECT program; however, not generating from facilities in the MECT or HECT program. In addition, the HECT facilities were transferred to Kuraray America, Inc., in 2014.

V. Real/Quantifiable

✓	Review	Notes
<input checked="" type="checkbox"/>	<p>Confirm there was no shifting of activity at the site per §101.303.</p> <ul style="list-style-type: none"> If applicable, review the Maximum Allowable Emission Rate Table (MAERT) to ensure that similar facilities or facilities serving the same purpose as the facilities being shutdown have not been added to the MAERT. 	See Correspondence dated 08/01/2017, page 1 of 1381.
<input checked="" type="checkbox"/>	<p>Ensure the protocol is appropriate and consistent for the SIP and historical adjusted emissions years. Refer to the following sources for guidance:</p> <ul style="list-style-type: none"> §101.302 and §101.303 Emission Inventory Guidelines Air NSR Permits: Index of Common Permitted Facilities <p>If calculation method is not acceptable and/or consistent, request applicant recalculate emissions using an acceptable and/or consistent method.</p>	
<input checked="" type="checkbox"/>	<p>Verify that all compounds listed are VOCs as defined by the Environmental Protection Agency under 40 Code of Federal Regulations §51.100(s).</p> <ul style="list-style-type: none"> Check that only VOC reductions are being credited. Remove any non-VOCs from the total VOC emissions. 	VOCs (Correspondence dated 03/15/2017, page 4 of 1441) provides a list per FIN: Acetic Acid, Toluene, Ethanol, Dimethylamine (DMA), F-3455.HCl, Cyclohexylisocyanate(CHI), Hexane, and Unspeciated VOCs

✓	Review	Notes
<input checked="" type="checkbox"/>	Review supporting documentation. Refer to the appropriate ERC supplemental documents for assistance.	
<input checked="" type="checkbox"/>	<p>Review emission quantification calculations.</p> <ul style="list-style-type: none"> Check the math for at least one facility type for each protocol If multiple facilities using the same protocol, ensure that the applicant entered the data correctly for the remaining facilities. Perform calculations for a representative sample of each facility type for which no calculation is provided to ensure math was done correctly. Ensure that applicable rules/authorization limits that would impact emissions (e.g., emission rates, destruction efficiency, etc.) are being used in the calculations. If not, have the applicant recalculate emissions using the limits or provide documentation on how they are compliant with the limit. If alternative data under §101.302 is used, determine if compliant data is available or if data higher on the list is available and justification is provided. 	<p>FIN VP-05F/EPN VP-05F in early reporting years was reported under several FIN/EPN combos. In later years, FIN VP-05F/EPN VP-05F was reported under a single FIN/EPN combo. As such for 2006, the company provided a list of FINs that should be associated with FIN VP-05F/EPN VP-05F in the ERC generation project. See Tab FIN VP-05F, 2006 Calc in the project file.</p>

VI. Surplus

✓	Review	Notes
<input checked="" type="checkbox"/>	For point source facilities, compare the actual emissions to the Emissions Inventory-reported emissions for the corresponding years. The lower of these values, adjusted for any exceedance of regulatory or permit limits, should be used to determine the historical adjusted emissions and SIP emissions, and thus the baseline emissions.	
<input type="checkbox"/>	For area sources, determine historical adjusted emissions, SIP emissions, and baseline emissions from actual operations, adjusting for any exceedance of regulatory or permit limits.	N/A - Point Source
<input type="checkbox"/>	For area sources, apply shut down and/or non-standard protocol deductions as appropriate.	N/A - Point Source
<input type="checkbox"/>	For area sources, verify that total amount to be generated doesn't exceed remaining available SIP emissions in the Area Source SIP emission file located on the H drive at: H:\EBT\SIP Emissions.	N/A - Point Source
<input checked="" type="checkbox"/>	Document any exceedance of emission limits observed in determining the baseline emissions in the Key Points and to the applicant.	
<input checked="" type="checkbox"/>	<p>Review the strategic emissions as defined in §101.300.</p> <ul style="list-style-type: none"> Refer to the permit for the strategic emissions. (e.g., MAERT) 	Strategic Emissions = 0 tpy - Shutdown

VII. Enforceable/Permanent

✓	Review	Notes
<input checked="" type="checkbox"/>	<p>Confirm the reduction is enforceable via one or a combination of the following mechanisms, as applicable.</p> <ul style="list-style-type: none"> Amended or voided Nonattainment New Source Review (NNSR). Amended Permit by Rule (PBR) registration. APD-CERT, as applicable. EBT-CERT. <p>Permit alterations should not be finalized until the end of processing the ERC application so the applicant will not need to revise the permit again if the amount of reduction changes.</p>	<p>Permit 2446A voided 09/09/2016; FOP O-1905 voided 03/06/2017</p> <p>EBT-CERT submitted to STEERS on 04/13/2018</p>
<input checked="" type="checkbox"/>	Create EBT-CERT in IMS, ensure EBT-CERT language is approved by Team Lead, and send to applicant. Verify EBT-CERT was certified in STEERS.	Verified EBT-CERT certified 04/13/2018

VIII. Project Completion

✓	Review	Notes
<input checked="" type="checkbox"/>	<p>Calculate the amount of credits to be certified. (BE - SE = ERC)</p> <ul style="list-style-type: none"> Contact the company if the actual amount of credits is different than requested. 	See Table 1 and 2 on page 7 of this document.
<input type="checkbox"/>	If the company is proposing to generate ERCs from facilities in the Cap and Trade programs, prior to completion of generation project the company must permanently surrender an equivalent amount of nitrogen oxides (NO _x) or HRVOC allowances, as applicable, to the TCEQ retirement account.	N/A - company not generating from facilities in these programs
<input checked="" type="checkbox"/>	Determine the credit expiration date: five years after the facility's emission reduction date with some exceptions noted under §101.303 .	<p>6 different expiration dates</p> <p>FIN VP-01AC: 08/31/2021</p> <p>FIN UC-02P: 08/11/2020</p> <p>FIN VP-01P-2: 06/02/2020</p> <p>FIN VP-03P-5: 06/04/2020</p> <p>FIN VP-05F: 09/26/2021</p> <p>FIN VP-01BC: 08/20/2021</p>
<input checked="" type="checkbox"/>	<p>Ensure that all required project data is entered into IMS.</p> <ul style="list-style-type: none"> Refer to EBT Standard Operating Procedures (SOP). 	
<input checked="" type="checkbox"/>	Complete approval or denial letter.	
<input checked="" type="checkbox"/>	<p>Route letter and checklist to Team Lead and Section Manager</p> <ul style="list-style-type: none"> If ERC is denied, the letter and checklist will route to Division Director. 	<p>To Team/Work Leader: 03/23/2018</p> <p>To Section Manager: 04/03/2018</p>
<input checked="" type="checkbox"/>	E-mail applicant the letter.	Emailed 04/13/2018
<input checked="" type="checkbox"/>	<p>Prepare electronic file and upload to WCC. Refer to Filing with INEW SOP.</p> <ul style="list-style-type: none"> Shred confidential files once available in WCC. 	Uploaded to WCC: 04/13/2018

IX. General Notes

A description of the process is provided under the Process Description tab, Attachment A.

Ineligible Facilities:

They had requested but were ineligible to generate ERCs from the following FINs VP-01L-1, VP-01P-1, VP-01P-4, VP-01P-6, VP-01P-7, VP-01T, VP-02L-1, VP-02L-2, VP-02L-3, VP-02L-4, VP-02L-5, VP-2T, VP-03P-1, VP-03P-2, VP-03P-3, VP-03P-7, VP-03P-8, VP-03P-9, VP-03P-10, VP-03P-11, VP-03P-12, VP-03T, VP-05T, VP-06T, VP-07T, VP-09T, VP-10T, VP-11T, VP-14T, VP-05F13, and VP-05F27, because the amount of potential ERCs rounded to zero.

FINs VP-01P-3, VP-01P-5, VP-03P-4, VP-03P-6, VP-03P-13, VP-13T, and VP-01BC were able to generate based on the values reported on the application but were removed from the application by the company in the Correspondence dated 03/15/2017. The company did not explain why they removed these facilities.

2006 Calculations:

The 2006 calculation methodology for FINs VP-01AC, VP-01P-2, VP-03P-5, UC-02P, and VP-01BC is based on calculations submitted to Emission Inventory because the available data for the SIP year was limited.

However, the company was able to recalculate the emissions for the FIN VP-05F to be consistent with the baseline year calculation methodology. In addition, the company revised their baselines years for all the FINs in this project to be able to provide supporting documentation since the data available for earlier years was limited. The 2006 SIP year was not used to determine the baseline emissions for any of the FINs, except FINs VP-01AC, and VP-01BC for the NO_x ERC generation amount, because the historical emissions were lower in all cases, except FINs VP-01AC, and VP-01BC for the NO_x ERC generation amount.

30 TAC §113.700, Pesticide Active Ingredient Production:

The FOP O-1905 references both §113.700 and 40 Code of Federal Regulations (CFR) Part 63, Subpart MMM. However, §113.700, which states 'The Pesticide Active Ingredient Production Maximum Achievable Control Technology standard as specified in 40 CFR Part 63, Subpart MMM, is incorporated by reference as amended through March 27, 2014 (79 FR 17340).' Since §113.700 references 40 CFR Part 63, Subpart MMM and 40 CFR Part 63, Subpart MMM is included in the list of regulations for each applicable facility, §113.700 was not included in the list of regulations for each applicable facility.

Table 1. Creditable VOC ERCs.

ERC Certificate	FIN	FIN Name	Year	Actual Emissions (tpy)	EI Reported Emissions (tpy)	Adjusted Emissions (tpy)	Historical Adjusted Emissions (tpy)	2006 SIP Emissions (tpy)	BE (tpy)	SE (tpy)	ERCs (tpy)
3230	VP-01AC	Velpar Flare	2012 2013	0.06 0.06	0.08 0.09	0.06 0.06	0.06	1.46	0.06	0.00	0.1
3227	VP-01-2	Vacuum Stripper	2012 2013	0.13 ^a 0.13 ^a	0.21 0.22	0.13 0.13	0.13	0.94 ^c	0.13	0.00	0.1
3228	VP-03P-5	Dryer	2012 2013	3.50 4.06	2.13 2.47	2.13 ^b 2.47 ^b	2.30	2.89 ^c	2.30	0.00	2.3
3229	UC-02P	NAOME Reactor	2012 2013	0.72 0.58	0.72 0.58	0.72 0.58	0.65	0.76	0.65	0.00	0.7
3231	VP-05F	Liquid Toluene Fugitives	2012 2013	6.53 3.57 ^a	6.51 6.19	6.51 ^b 3.57	5.04	5.30 ^{c,d}	5.04	0.00	5.0
Total:											8.2

a. The reported value on the form did not correspond with the supporting documentation. Revised value to correspond with supporting documentation.

b. Adjusted to not exceed reported EI value.

c. Adjusted to not exceed permit limit at the time of reduction (2015 MAERT limit).

d. There were several FINs routed to EPN VP-05F including FIN VP-05F that were being reported as individual FIN/EPN combos. However, in later years emissions were solely reported under FIN VP-05F and EPN VP-05F. The company listed the associated FINs in the calculations for 2006 (Appendix K).

Table 2. Creditable NO_x ERCs.

ERC Certificate	FIN	FIN Name	Year	Actual Emissions (tpy)	EI Reported Emissions (tpy)	Adjusted Emissions (tpy)	Historical Adjusted Emissions (tpy)	2006 SIP Emissions (tpy)	BE (tpy)	SE (tpy)	ERCs (tpy)
3226	VP-01AC	Velpar Flare	2012 2013	2.53 2.56	2.74 2.85	2.53 2.56	2.55	1.24	1.24	0.00	1.2
3225	VP-01BC	NAOME Flare	2012 2013	0.82 0.39	0.42 0.47	0.42 ^a 0.39	0.41	0.33	0.33	0.00	0.3
Total:											1.5

a. Adjusted to not exceed reported EI value.

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Stephanie Bergeron Perdue, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 20, 2018

Amalia Berrios
VP/SR. Counsel
Amerex Brokers LLC
1 Sugar Creek Center Boulevard, Suite 700
Sugar Land, TX 77478
Via email: aberrios@amerexenergy.com

Re: ERC Creditability Review
ERC Certificate(s): 3225, 3226, 3227, 3228, 3229, 3230, and 3231
Project Number: 413244

Dear Amalia Berrios:

This letter is in response to the Application for Creditability Review of Emission Credits submitted on June 4, 2018 requesting review of the nitrogen oxides (NO_x) and volatile organic compounds (VOC) emission reduction credits (ERCs) in certificate(s) 3225, 3226, 3227, 3228, 3229, 3230, and 3231. The ERCs in these certificate(s) were certified by El DuPont de Nemours and Company in project 411369 from the permanent shutdown of the Herbicide Business Unit at the La Porte Plant.

The Texas Commission on Environmental Quality (TCEQ) has determined that as of June 20, 2018 there have been no regulatory changes that decrease the certified amount of ERCs available in certificate(s) 3225, 3226, 3227, 3228, 3229, 3230, and 3231. Changes to the representations made in the original ERC application or future regulatory actions could affect the amount of credits available for use in the certificates.

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. If you have questions concerning this project or the EBT program, please contact Denine Calvin at (512) 239-0613 or denine.calvin@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: Kelly Covington, Emissions Broker/Consultant, Amerex Brokers LLC, Sugar Land
David DeVooght, Analyst, Amerex Brokers LLC, Sugar Land
Alex Altor, Plant Manager, El Du Pont de Nemours and Company, La Porte

From: [Denine Calvin](#)
To: ["ABERRIOS@AMEREXENERGY.COM"](#)
Cc: ["KCOVINGTON@AMEREXENERGY.COM"](#); ["ddevooight@amerexenergy.com"](#); ["R-ALEX.ATOR@DUPONT.COM"](#)
Subject: TCEQ EBT Documents - ERC ReReview - AMEREX BROKERS LLC
Date: Wednesday, June 20, 2018 11:24:00 AM
Attachments: [413244.ECRR.BKR1046.pdf](#)

Please see the attached EBT document(s) for project number 413244. For additional information about this project, visit the TCEQ EBT Database. If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality

EBT Programs

(512) 239-4900

ebt@tceq.texas.gov

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