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07/11/2018 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 412794 STATUS: C DISP CODE: _____
RECEIVED: 02/20/2018 PROJTYPE: BUSE ISSUED DT: 07/11/2018
SUP-DISP DATE: 07/11/2018

STAFF ASSIGNED TO PROJECT:
THOMAS, JOSEPH

PROJECT NOTES:

.INTENT PROJECT NUMBER 412255
.2017 MECT REPORT - 412736
.2/20/2018 - THE 2017 MECT REPORT HAS BEEN RECEIVED BY TCEQ, BUT WILL NOT BE PROCESSED UNTIL AFTER 3/31/2018.
.PROJECT SUSPENDED TO ALLOW MECT ACR 412736 TO BE PROCESSED FIRST.

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: ROHM AND HAAS TEXAS INCORPORATED
CUSTOMER REGISTRY ID: CN600131395

PORTFOLIO DATA

NUMBER: P0607 NAME: ROHM AND HAAS TEXAS DEER PARK - RN100223205

SITE DATA

ACCOUNT: HG0632T
REG ENTITY ID: RN100223205
SITE NAME: ROHM AND HAAS TEXAS DEER PARK PLANT
COUNTY: HARRIS NEAREST CITY: DEER PARK
LOCATION: 1900 TIDAL ROAD, DEER PARK, TEXAS 77536

CONTACT DATA

NAME: PRENTICE C.JAMES TITLE: Regional EH&S Manager
ROLE: AAR
STREET: 332 SH 332 E, APB2A1
CITY/STATE, ZIP: LAKE JACKSON, TX , 77566-
PHONE: 979-238-1443 -
EMAIL: PCJAMES@DOW.COM

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2018-02-20 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: NOX TONS: 477.00 DOLLARS: 0
ALLOWANCE0 CERTIFICATE NO.: D2548 COUNTY : HARRIS

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE
DATE ENTERED: 2018-02-20 00:00:00.0 DELETED DATE: EFFECTIVE YEAR: 2017
CONTAMINATE: NOX TONS: 0 DOLLARS: 0
ALLOWANCE1 CERTIFICATE NO.: 0 COUNTY : HARRIS

TRACKING ACTIVITIES

PROJECT SUBMITTED : 02/14/2018 PM RECEIVED DATE : 02/21/2018
PROJECT SUSPENSION : 02/21/2018 07/05/2018
TEAM LEAD REVIEW : 07/09/2018 07/10/2018
SECTION MANAGER REVIEW : 07/10/2018 07/11/2018 PROJECT COMPLETED : 07/11/2018



Form DEC-3 (Page 1)
Notice of Use of Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

Received

FEB 20 2018

Air Quality Division

412794

PO657

I. COMPANY IDENTIFYING INFORMATION			
A. Company Name: Rohm and Haas Texas Incorporated			
B. Mailing Address: 1900 Tidal Road			
City: Deer Park	State: TX	Zip Code: 77536	
Telephone: 979-238-1443		Fax: 979-238-0352	
B. TCEQ Customer Identification Number (CN): CN600131395			
C. Site Name: Rohm and Haas Texas Deer Park			
Street Address (If no street address, give driving directions to site): 1900 Tidal Road			
Nearest City: Deer Park	Zip Code: 77536	County: Harris	
D. TCEQ Regulated Entity Number (RN): RN100223205			
E. TCEQ Account Number (if applicable): HG0632T			
F. Primary SIC: 2869		Air Permit Number:	
II. TECHNICAL CONTACT IDENTIFYING INFORMATION			
A. Technical Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : Prentice C. James			
Technical Contact Title: Regional EH&S Manager			
Mailing Address: 322 SH 322 E, APB2A1			
City: Freeport	State: TX	Zip Code: 77541	
Telephone: 979-238-1443	Fax: 979-238-0317	E-mail: pcjames@dow.com	
III. COMPANY CONTACT IDENTIFYING INFORMATION			
A. Company Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) Prentice C. James			
Technical Contact Title: Regional EH&S Manager			
Mailing Address: 322 SH 322 E, APB2A1			
City: Lake Jackson	State: TX	Zip Code: 77566	
Telephone: 979-238-1443	Fax: 979-238-0317	E-mail: pcjames@dow.com	
IV. Mass Emission Cap and Trade Program (MECT)			
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Year DERC Generated: 1994-1997 Year of use: 2017 Ratio of DERC to Allowance: 10 to 1			
Note: If DERC use is to comply with MECT then go to Section X			
V. Use Period			
Use Start Date: 01/01/2017		Use End Date: 12/31/2017	



Form DEC-3 (Page 1)
Notice of Use of 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: **n/a**

VII. Most Stringent Emission Rate

Describe basis for most stringent allowable emission rate:

☐ Permit : _____ ☐ RACT : _____ ☐ Other: _____

Notes:

VIII. PROTOCOL

Protocol used to calculate DERC:

Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form



Form DEC-3 (Page 1)
Notice of Use of 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. VI.)	CO: _____	NO _x : <u>0.0</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS Used	CO: _____	NO _x : <u>0.0</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

XI. DERC INFORMATION

Name of the DERC Generator: Dow Texas Operations Freeport

DERC Generator Regulated Entity Number: 100225945

Certificate number of the DERCS acquired or to be acquired: D2548

Note: The certificate number is assigned by the TCEQ

XII. CERTIFICATION BY RESPONSIBLE OFFICIAL

I, Prentice C. James, 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: Prentice C. James Date: February 14, 2018

Title Regional EH&S Manager

From: [Joe Thomas](#)
To: [James, Prentice \(PC\) \(PCJames@dow.com\)](#)
Subject: DERC Use Project for 2017 MECT Control Period for Rohm and Haas Texas Deer Park
Date: Tuesday, April 10, 2018 12:47:00 PM

Prentice,

I have been assigned this DERC use project, but cannot process it until the 2017 MECT annual report is done. I have suspended the review of the DERC use until then, but this will not have an impact on the project (other than the processing delay). I will let you know after the MECT report is done if anything is needed.

Thank you
Joseph Thomas
Emission Banking and Trading Program
Air Quality Division
(512) 239-0012

How is our customer service? <https://www.tceq.texas.gov/customersurvey>

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

From: [Lindley Anderson](#)
To: [Joe Thomas](#)
Cc: [Melissa Ruano](#)
Subject: RE: For Review and Approval by 7/11/2018: 2017 MECT ACR and DERC Use for Rohm and Haas Texas Deer Park (412736 and 412794)
Date: Tuesday, July 10, 2018 4:36:34 PM

Approved – just check the potential deviation box at the top of the technical review before sending on for approval

Lindley Anderson

(512) 239-0003

From: Joe Thomas
Sent: Friday, July 06, 2018 9:54 AM
To: Lindley Anderson <lindley.anderson@tceq.texas.gov>
Cc: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Subject: For Review and Approval by 7/11/2018: 2017 MECT ACR and DERC Use for Rohm and Haas Texas Deer Park (412736 and 412794)
Importance: High

Lindley,

The MECT report received an audit-level review, and a potential deviation is noted. Per the company's e-mail of 7/6/2018, the review and correction of max rated capacities in IMS for several FINs is being deferred until the 2018 report is filed (sentence added to CTAL). The stack test reports show that the facilities listed in the CTAL and CTTR were tested well above the max rated capacity in IMS. There is a potential deviation noted for three facilities that operated well above the tested load for some months in 2017, but no quantification penalty since the tests were not rejected. All of the stack test reports for emission factors used in the report were reviewed.

There were sufficient allowances available, so no DERCs were used. Therefore, no tech review was done for 412794.

Attached are the CTAL, CTTR, DCUS, and project files. The stack test reports and reviews are saved at H:/temp/412736 Stack test reports and reviews.

Thank you
Joseph Thomas
Emission Banking and Trading Program
Air Quality Division
(512) 239-0012

From: [Guy Hoffman](#)
To: [Joe Thomas](#); [Daphne McMurrer](#)
Cc: [Lindley Anderson](#); [Melissa Ruano](#)
Subject: RE: For Review and Approval by 7/13/2018: 2017 MECT ACR and DERC Use for Rohm and Haas Texas Deer Park (412736 and 412794)
Date: Wednesday, July 11, 2018 8:02:08 AM
Attachments: [image001.png](#)
Importance: High

Approved.

Thanks,

Guy Hoffman

Senior Technical Specialist

Air Quality Planning Section

512-239-1981



From: Joe Thomas
Sent: Wednesday, July 11, 2018 7:27 AM
To: Daphne McMurrer <Daphne.Mcmurrer@tceq.texas.gov>; Guy Hoffman <guy.hoffman@tceq.texas.gov>
Cc: Lindley Anderson <lindley.anderson@tceq.texas.gov>; Melissa Ruano <melissa.ruano@tceq.texas.gov>
Subject: For Review and Approval by 7/13/2018: 2017 MECT ACR and DERC Use for Rohm and Haas Texas Deer Park (412736 and 412794)
Importance: High

Daphne and Guy,

The MECT report received an audit-level review, and a potential deviation is noted. Per the company's e-mail of 7/6/2018, the review and correction of max rated capacities in IMS for several FINs is being deferred until the 2018 report is filed (sentence added to CTAL). The stack test reports show that the facilities listed in the CTAL and CTTR were tested well above the max rated capacity in IMS. There is a potential deviation noted for three facilities that operated well above the tested load for some months in 2017, but no quantification penalty since the tests were not rejected. All of the stack test reports for emission factors used in the report were reviewed.

There were sufficient allowances available, so no DERCs were used. Therefore, no tech review was done for 412794.

Attached are the CTAL, CTTR, DCUS, and project files, as well as the approval from Lindley. The stack test reports and reviews are saved at H:/temp/412736 Stack test reports and reviews.

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

July 11, 2018

Mr. Prentice C. James
Regional EH&S Manager
Rohm and Haas Texas Incorporated
322 State Highway 322 East, APB2A1
Lake Jackson, Texas 77566
Via email: pcjames@dow.com

Re: Use of Discrete Emission Credits
Rohm and Haas Texas Incorporated
Rohm and Haas Texas Deer Park Plant
Customer Number: CN600131395
Regulated Entity Number: RN100223205
EBT Portfolio Number: P0607
Project Number: 412794

Dear Mr. James:

This letter is in response to the Notice of Intent to Use Discrete Emission Credits submitted on September 25, 2017 and the Notice of Use of Discrete Emission Credits submitted on February 14, 2018 regarding the use of nitrogen oxides (NO_x) discrete emission reduction credits (DERCs) for the purpose of compliance with the Mass Emissions Cap and Trade (MECT) Program during the period of January 1, 2017 through December 31, 2017. The Texas Commission on Environmental Quality (TCEQ) is approving the DERC use as summarized below. The retained certificate is now available for future use or trade as allowed under 30 Texas Administrative Code Chapter 101, Subchapter H, Division 4.

Pollutant	Set Aside Certificate	Amount Set Aside (tons)	Amount Used (tons)	Retained Certificate	Amount Retained (tons)
NO _x	D2548	477.0	0.0	D2548	477.0

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 Joseph Thomas at (512) 239-0012 or joe.thomas@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: Mr. Bob Allen, Director, Harris County Pollution Control Services Department, Pasadena

From: [Joe Thomas](#)
To: [James, Prentice \(PC\) \(PCJames@dow.com\)](#)
Cc: ["Air Permits@pcs.hctx.net"](#)
Subject: TCEQ EBT Documents - 2017 MECT Annual Compliance Report and DERC Use for Rohm and Haas Texas Deer Park Plant
Date: Wednesday, July 11, 2018 5:39:00 PM
Attachments: [412736 CTAL Rohm and Haas Texas Incorporated.pdf](#)
[412794 DCUS Rohm and Haas Texas Incorporated.pdf](#)
Importance: High

Mr. James,

Please see the attached EBT documents for project numbers 412736 and 412794. For additional information about the projects, visit the [TCEQ EBT Database](#). If you have any questions, please see the contact information in the last paragraph of the attached letters.

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.