

[Return to Sharenet](#)**01/16/2019 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 413551 STATUS: C DISP CODE: _____
RECEIVED: 01/10/2019 PROJTYPE: BERR ISSUED DT: 01/16/2019
SUP-DISP DATE: 01/16/2019

STAFF ASSIGNED TO PROJECT:

THOMAS, JOSEPH

PROJECT TRANSACTIONS**COMPANY DATA**

COMPANY NAME: OXY VINYLs LP

CUSTOMER REGISTRY ID: CN600129126

PORTFOLIO DATA

NUMBER: P0513 NAME: OXY VINYLs - PASADENA PVC - RN102518065

SITE DATA

ACCOUNT: HG1451S

REG ENTITY ID: RN102518065

SITE NAME: PASADENA PVC

COUNTY: HARRIS

NEAREST CITY: PASADENA

LOCATION: 4403 PASADENA FWY, PASADENA, TX

CONTACT DATA

NAME: PAUL THOMAS

TITLE: PLANT MANAGER

ROLE: AAAR

STREET:

CITY/STATE, ZIP:

PHONE: 281-476-2915 -

EMAIL: PAUL_THOMAS@OXY.COM

NAME: DEANNA STRAIN

TITLE: ENVIRONMENTAL MANAGER

ROLE: TECHNICAL

STREET: PO BOX 500

CITY/STATE, ZIP: DEER PARK, TX , 77536-0500

PHONE: 281-476-2909 -

EMAIL: DEANNA_STRAIN@OXY.COM

NAME: SCOTT HALBROOKS

TITLE: ASSISTANT PLANT MANAGER

ROLE: AAR

STREET: PO BOX 849

CITY/STATE, ZIP: PASADENA, TX , 77501-0849

PHONE: 281-884-4020 -

EMAIL: SCOTT_HALBROOKS@OXY.COM

NAME: DEBORAH PICKERING
ROLE: TECHNICAL
STREET: PO BOX 500
CITY/STATE, ZIP: DEER PARK, TX , 77536-0500
PHONE: 281-476-2666 -
EMAIL: DEBORAH_PICKERING@OXY.COM

TITLE: ENVIRONMENTAL ENGINEER

NAME: JEFF DELOACH
ROLE: TECHNICAL
STREET: PO BOX 500
CITY/STATE, ZIP: DEER PARK, TX , 77536-0500
PHONE: 281-884-4047 -
EMAIL: JEFFREY_DELOACH@OXY.COM

TITLE: ENVIRONMENTAL ENGINEER

TRANSACTION DATA

TRANSACTION TYPE: ERC_RRVW
DATE ENTERED: 2019-01-10 00:00:00.0
CONTAMINATE: VOC
ALLOWANCE 0

DELETED DATE: EFFECTIVE YEAR:
TONS: 0 DOLLARS: 0
CERTIFICATE NO.: 0 COUNTY : HARRIS

COMPANY DATA

COMPANY NAME: OXY VINYL LP
CUSTOMER REGISTRY ID: CN600129126

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PHONE: 281-884-4047 -
EMAIL: JEFFREY_DELOACH@OXY.COM

TITLE: ENVIRONMENTAL ENGINEER

TRANSACTION DATA

TRANSACTION TYPE: ERC_RET
DATE ENTERED: 2019-01-10 00:00:00.0
CONTAMINATE: VOC
ALLOWANCE 0

DELETED DATE: EFFECTIVE YEAR:
TONS: 64.50 DOLLARS: 0
CERTIFICATE NO.: 2897 COUNTY : HARRIS

TRACKING ACTIVITIES

PROJECT SUBMITTED : 01/08/2019 PM RECEIVED DATE : 01/10/2019
TEAM LEAD REVIEW : 01/10/2019 01/15/2019
TECHNICAL SPECIALIST REVIEW : 01/15/2019 01/16/2019 PROJECT COMPLETED : 01/16/2019

Emission Reduction Credit (ERC) Creditability Technical Review

Project Number:	413551	Project Manager:	Joseph Thomas
Broker Account No.:	BKR1046	Company Name:	Amerex Brokers LLC
Portfolio Number:	P3382	Certificate	2897

Project Overview

Amerex Brokers LLC submitted a Creditability Review of Emissions Credits application on 1/8/2019 for the review of ERC certificate 2897.

ERC Creditability

Certificate 2897: 64.5 tpy VOC

Oxy Vinyls, LP, certified ERCs from a process change that replaced methanol and other solvents in the production of polyvinyl chloride (PVC) with water. Because of the change, which reduced emissions of volatile organic compounds (VOC) from the seven resin dryers at the plant. The company altered the calculation method to limit the reduction only to methanol from suspending agents, which changed the eligible amount to 64.5 tpy. The production change was implemented on March 11, 2015, and the permit was altered on October 29, 2015, with additional alterations later as the company explored various ways to make the reduction enforceable. As the earliest of the dates, March 11, 2015 is the date the reduction strategy was implemented. The ERCs were certified on 1/19/2017.

There has been no review or use of the ERCs since generation.

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 410326 and the submission of this creditability review project. Therefore, certificate number 2897 still retains the certified amount of 64.5 tpy and the full amount is available.

Table 1: Regulatory Review

FINs/EPNs	Citations and Regulations	Verified	Last Revision Date
V301 / 70A/B V302 / 71A/B V303 / 72A/B V304 / 83A/B V305 / 89A/B V306 / 90A/B V307 / 92A/B/C	Permit 18384	The methanol limit for the group of dryers has not changed. Special Condition (SC) 2 has been renumbered as SC 6, and the VOC limit for FIN V304 has been changed from 101.7 ppmw to 195 ppmw. However, only the PVC limits for the dryers, which have not changed, were used in calculating the ERCs.	9/28/2017
V301 / 70A/B V302 / 71A/B V303 / 72A/B V304 / 83A/B V305 / 89A/B V306 / 90A/B V307 / 92A/B/C	40 CFR Part 63 Subpart HHHHHHH §63.11880	There have been no changes to this section since the generation of the ERCs.	4/17/2012

FINs/EPNs	Citations and Regulations	Verified	Last Revision Date
V301 / 70A/B V302 / 71A/B V303 / 72A/B V304 / 83A/B V305 / 89A/B V306 / 90A/B V307 / 92A/B/C	30 TAC §115.121	There have been no changed to this section since the ERCs were issued.	6/25/2015
V301 / 70A/B V302 / 71A/B V303 / 72A/B V304 / 83A/B V305 / 89A/B V306 / 90A/B V307 / 92A/B/C	30 TAC §115.122	There have been no changed to this section since the ERCs were issued.	6/25/2015

Conclusion

From this review it has been determined that, as of 1/16/2019, the ERCs on certificate 2897 have not devalued.



Received

041 JAN 10 2019

Air Quality Division

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

2012

SPECIAL CONDITIONS

Permit Numbers 18384 and N002

Emission Standards and Operational Limitations

1. This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit. **(07/04)**
2. The vinyl chloride monomer (VCM) content of the dewatered stripped slurry produced in these facilities shall not exceed 10.0 parts per million by weight (ppmw) on an annual average basis and
 - A. 220 ppmw on a daily average basis for Dryer Nos. 2, 5, and 6;
 - B. 175 ppmw on a daily average basis for Dryer No. 1;
 - C. 166 ppmw on a daily average basis for Dryer No. 3;
 - D. 167 ppmw on a daily average basis for Dryer No. 7; and
 - E. 150 ppmw on a daily average basis for Dryer No. 4.

The maximum volatile organic compound (VOC) content of the dewatered stripped slurry for Dryer 4 shall not exceed 195 ppmw on an annual average basis. **(2/12)**

3. The annual production of polyvinyl chloride (PVC) from these facilities shall not exceed 2,200 Million (MM) pounds per year. Monthly PVC production records shall be maintained. **(04/06)**
4. Reactor opening losses for Emission Point Nos. (EPNs) 73 A-H, 73 J-K, 76 L-M, and 73 N-O may not be emitted to the atmosphere from more than one reactor at a time. **(07/04)**
5. No more than eight of the PVC Storage Silos, EPNs 77A-H, 77J-N, and 77P-Y, shall be operated simultaneously. **(07/04)**

Federal Applicability

6. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants (NESHAPS) promulgated for National Emission Standards for Vinyl Chloride

2017

Special Conditions
Permit Numbers 18384 and N002
Page 2

- C. Subpart HHHHHHH, National Emission Standards for Hazardous Air Pollutant Emissions for Polyvinyl Chloride and Copolymers Production

Standards and Operational Specifications

6. The vinyl chloride monomer (VCM) content of the dewatered stripped slurry produced in these facilities shall not exceed 10.0 parts per million by weight (ppmw) on an annual average basis and

- A. 220 ppmw on a daily average basis for Dryer Nos. 2, 5, and 6;
- B. 175 ppmw on a daily average basis for Dryer No. 1;
- C. 166 ppmw on a daily average basis for Dryer No. 3;
- D. 167 ppmw on a daily average basis for Dryer No. 7; and
- E. 150 ppmw on a daily average basis for Dryer No. 4.

The volatile organic compound (VOC) content of the dewatered stripped slurry for all seven dryers shall not exceed 101.7 ppmw on a weighted 12-month rolling average.

7. Suspending agents used in the manufacturing of resins dried in Facility Identification Numbers (FINs) V-301, V-302, V-303, V-304, V-305, V-306, and V-307 shall be low-VOC, containing maximum 25% VOC, as applied. This special condition shall apply during the service life of these dryers.
8. The annual methanol emissions for the PVC Dryer Emission Caps, also known as Emission Point Number (EPN) 70A/B, 71, A/B, 72A/B, 83A/B, 89A/B, 90A/B, and 92A/B, will be verified to ensure that they are below the authorized rates of the Maximum Allowable Emission Rate Table (MAERT). This will be accomplished by using the Emissions Inventory methodology for the site.
9. The annual production of polyvinyl chloride (PVC) from these facilities shall not exceed 2200 Million (MM) pounds per year. Monthly PVC production records shall be maintained.
10. Reactor opening losses for Emission Point Nos. (EPNs) 73 A-H, 73 J-K, 76 L-M, and 73 N-O may not be emitted to the atmosphere from more than one reactor at a time.
11. No more than eight of the PVC Storage Silos, EPNs 77 A-H, 77 J-N, and 77 P-Y shall be operated simultaneously.

Compliance Assurance Monitoring

12. The following requirements apply to capture systems for the Incinerator/Scrubber (EPN 88):
- A. If used to control pollutants other than particulate, either:
 - (1) Conduct a once a month visual, audible, and/or olfactory inspection of the capture system to verify there are no leaking components in the capture system;

Step 2: Determine the Historical adjusted emissions

Take the Historical Reported Emissions and adjust them as necessary to reflect **any applicable local, state, or federal requirement**. For this particular purpose, **any applicable local, state, or federal requirement** not only includes requirements that applied in the two reporting years, but also requirements that have become applicable since then. The reporting years are:

- Year 1: 2006
- Year 2: 2007

Historical Reported Emissions for the Dryers (as submitted in the EI Report):

EPN	FIN	Facility Name	Year 1 Reported VOC Emissions (T/yr)	Year 2 Reported VOC Emissions (T/yr)
70A/B	V-301	PVC Dryer Stack I	38.611	42.091
71A/B	V-302	PVC Dryer Stack II	30.758	23.048
72A/B	V-303	PVC Dryer Stack III	20.473	16.587
83A/B	V-304	PVC Dryer Stack IV	24.018	23.594
89A/B	V-305	PVC Dryer Stack V	24.645	20.794
90A/B	V-306	PVC Dryer Stack VI	28.818	24.185
92A/B/C	V-307	PVC Dryer Stack VII	42.227	42.467
Total:			209.550	192.766

These reported emissions **did not** exceed **any applicable local, state, or federal requirement** that applied at that time. However, these emissions do exceed requirements that came into effect subsequent to the reporting years, including:

- Permit No. 18384 and N002 amendments, which included reductions in emissions for the dryers. The most recent amendment was issued February 13, 2012.
- Vinyl chloride (VC) consent decree. This consent decree, which is reflected in Special Condition (SC) 2 of Permit No. 18384; compliance dates associated with this consent decree, which was entered on 7/27/2006, are:
 - Installation of new trays in one half of the resin slurry strippers within 24 months, or by 7/27/2008,
 - Completion of installations within 48 months, or by 7/27/2010, and
 - Achieve a 10 ppmw VC in resin limit within 62 months, or by 9/27/2011.
- 30 TAC Chapter 115 VOC requirements for process vents.
- 40 CFR Part 63 Subpart HHHHHHH requirements for PVC manufacturing units.

Therefore, the reported emissions must be compared to these later requirements and adjusted as necessary.

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 16, 2019

Ms. Amalia Berrios
Senior Counsel
Amerex Brokers LLC
1 Sugar Creek Center Boulevard, Suite 700
Sugar Land, Texas 77478
Via email

Subject: ERC Creditability Review
ERC Certificate: 2897
Project Number: 413551

Dear Ms. Berrios:

This letter is in response to the Application for Creditability Review of Emission Credits submitted on January 8, 2019 requesting review of the volatile organic compounds (VOC) emission reduction credits (ERCs) in certificate 2897. The ERCs in certificate 2897 were certified by Oxy Vinyls LP in project 410326 from a process change in the production of polyvinyl chloride at the Pasadena PVC site.

The Texas Commission on Environmental Quality (TCEQ) has determined that as of January 16, 2019 there have been no regulatory changes that decrease the certified amount of ERCs available in certificate 2897. 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 certificate.

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 dark ink, appearing to read "D. Huff".

Donna F. Huff, Director
Air Quality Division

cc: Mr. Kelly Covington, Emissions Broker, Amerex Brokers LLC
Mr. David DeVoight, Analyst, Amerex Brokers LLC

From: [Joe Thomas](#)
To: [Amalia Berrios \(aberrios@amerexenergy.com\)](mailto:aberrios@amerexenergy.com)
Cc: [Kelly Covington \(kcovington@amerexenergy.com\)](mailto:kcovington@amerexenergy.com); [David DeVooght \(ddevoght@amerexenergy.com\)](mailto:ddevoght@amerexenergy.com)
Subject: TCEQ EBT Documents - Review of ERC Certificate 2897
Date: Wednesday, January 16, 2019 8:57:00 AM
Attachments: [413551 ECRR Amerex Brokers LLC.pdf](#)
Importance: High

Ms. Berrios,

Please see the attached EBT document for project number 413551. For additional information about the 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.