



NUMBER: P0026 NAME: AIR PRODUCTS LA PORTE PLANT - RN102041282

**SITE DATA**

ACCOUNT: HG0010N

REG ENTITY ID: RN102041282

SITE NAME: AIR PRODUCTS LA PORTE PLANT

COUNTY: HARRIS

NEAREST CITY: LA PORTE

LOCATION: 10202 STRANG RD, LA PORTE, TX

**CONTACT DATA**

NAME: THOMAS IGO

TITLE: ASU OPERATIONS MANAGER

ROLE: TECHNICAL

STREET:

CITY/STATE, ZIP:

PHONE: 346-216-4070 -

EMAIL: IGOTW@AIRPRODUCTS.COM

NAME: TAMMY B. GROVER

TITLE: Lead Environmental Engineer

ROLE: AAR

STREET: 10202 STRANG ROAD

CITY/STATE, ZIP: LA PORTE, TX , 77571-

PHONE: 281-476-3172 -

EMAIL: GROVERTB@AIRPRODUCTS.COM

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2019-01-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **NOX**

TONS: **1.90**

DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **D3399** COUNTY : **HARRIS**

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_USE

DATE ENTERED: 2019-01-22 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

CONTAMINATE: **NOX**

TONS: **0.70**

DOLLARS: **0**

ALLOWANCE0

CERTIFICATE NO.: **D3398** COUNTY : **HARRIS**

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**TRACKING ACTIVITIES**

PROJECT SUBMITTED : 12/07/2018 PM RECEIVED DATE : 12/17/2018

TEAM LEAD REVIEW : 01/23/2019 01/24/2019

TECHNICAL SPECIALIST REVIEW : 01/25/2019 01/28/2019 PROJECT COMPLETED : 01/29/2019

## Discrete Emission Reduction Credit (DERC) Use Technical Review

Project Number:	413516	Project Manager:	Joseph Musa
Customer Reference No.:	CN602299257	Company Name:	Air Products LLC
Regulated Entity Reference No.:	RN102041282	Site Name:	Air Products La Porte Plant
Portfolio Number:	P0026	County:	Harris

### Project Overview

Review	Explanation
Application Submitted Date:	12/07/2018
Corresponding Intent to Use Project:	412745
Intent Amount and Certificate(s):	20.1 tons from certificate D3088 2.6 tons from certificate D3302
Pollutant:	NO <sub>x</sub>
Reason for Use:	30 TAC §117.320(c)
Use period:	04/01/2018-09/30/2018
Use Amount and Certificate(s):	0.7 tons from certificate D3302
Retained Amount and Certificate(s):	20.1 tons in certificate D3400 1.9 tons in certificate D3399
Additional Information:	The application was submitted for compliance with the 30-day rolling average NO <sub>x</sub> system cap under §117.320(c). Excess emissions of 0.7 tons (including the environmental contribution of 0.1 tons) from four gas turbines at the site will be covered by the NO <sub>x</sub> DERCs, which were set aside in project number 412745.

### Calculation Methodology

The 30-day rolling average system cap limit was established under §117.320(c). The heat input data from the third quarters of 2005 and 2006 was used to determine the average daily heat input of 6,840.1 million British thermal units (MMBtu); this value was multiplied by the emission specification for attainment demonstration in §117.310(a)(10)(A), 0.032 pound per MMBtu (lb/MMBtu), to establish the 218.9 lb NO<sub>x</sub>/day limit (see the technical review for project number 412219). The system cap limit is the same for the entire year because the third quarters represent the periods with the highest heat input.

For this use period, the regulatory system cap limit was exceeded 23 times, and the excess emissions totaled 1,069.1 lbs or 0.53 tons (rounded up to 0.6 tons). The additional 10% environmental contribution of 0.1 ton requires the use of 0.7 tons of NO<sub>x</sub> DERCs (see attachment to the application).

**Conclusion**

The TCEQ is approving the request to use 0.7 tons of NO<sub>x</sub> DERCs from certificate D3302 for compliance with §117.320(c) during the use period of 04/01/2018-09/30/2018.

Certificates D3399 (1.9 tons NO<sub>x</sub>) and D3400 (20.1 tons NO<sub>x</sub>) will be returned to the company for future use.



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

**Received**

DEC 12 2018

<b>I. COMPANY IDENTIFYING INFORMATION</b>		
A. Company Name: Air Products LLC		<b>Air Quality Division</b>
Mailing Address: 10202 Strang Road		
City: La Porte	State: TX	Zip Code: 77571
Telephone: 281-478-5901	Fax:	
B. TCEQ Customer Number (CN): CN602299257		
C. Site Name: Air Products La Porte Facility		
Street Address (If no street address, give driving directions to site) 10202 Strang Rd.		
Nearest City: La Porte	Zip Code: 77571	County: Harris
D. TCEQ Regulated Entity Number (RN): RN102041282		
E. TCEQ Air Account Number: (if applicable) HG-0010-N		
F. Primary SIC: 2813	Air Permit Number: 21878	
<b>II. TECHNICAL CONTACT IDENTIFYING INFORMATION</b>		
A. Technical Contact Name: ( <input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr. ): Tammy Grover		
Technical Contact Title: Lead Environmental Engineer		
Mailing Address: 10202 Strang Rd		
City: La Porte	State: TX	Zip Code: 77571
Telephone: 281-478-3172	Fax: 610-706-5140	E-mail: grovertb@airproducts.com
<b>III. COMPANY CONTACT IDENTIFYING INFORMATION</b>		
A. Company Contact Name: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr. ): Tammy Grover		
Company Contact Title: Lead Environmental Engineer		
Mailing Address: 10202 Strang Rd.		
City: La Porte	State: TX	Zip Code: 77571
Telephone: 281-478-3172	Fax: 610-706-5140	E-mail: grovertb@airproducts.com
<b>IV. Mass Emission Cap and Trade Program (MECT)</b>		
Is the DERC use for compliance with 30 TAC Chapter 101, Subchapter H, Division 3? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Year DERC Generated: _____ Year of use: _____ Ratio of DERC to Allowance: _____ to _____		
<i>Note: If DERC use is to comply with MECT then go to Section X</i>		
<b>V. Use Period</b>		
Use Start Date: <u>04 / 01 / 2018</u>		Use End Date: <u>09 / 30 / 2018</u>



**Form DEC-3 (Page 2)**  
**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:  
30 TAC §117.310(a)(10)(A)

**VII. Most Stringent Emission Rate**

Describe basis for most stringent allowable emission rate:

Permit : \_\_\_\_\_  RACT : 0.032 lb/MMBtu  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*

Continue to Section VII (next page)



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

IX. Tons of DERCs Used										
Emission Point No.	FIN	Air Contaminant	Calculation of DERCs							
			Actual Emissions Rate (units)	Actual Emissions Rate (units)	Actual Total Emissions (tons)	Regulated Activity (units)	Regulated Emissions Rate (units)	Regulated Total Emissions (tons)	DERCs Used (tons)	
			See Attachment for calculations							
								<b>Total:</b>		



**Form DEC-3 (Page 4)**  
**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)**

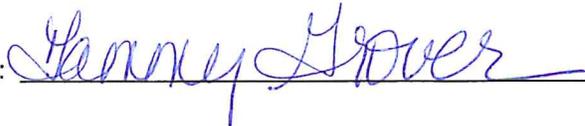
Tons of DERCS required (from Sect. VI.)	CO: _____	NO <sub>x</sub> : <u>0.6</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : <u>0.0 (only if used for</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	<u>MECT</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
		NO <sub>x</sub> : <u>0.1</u>			
<b>Total DERCS Used</b>	<b>CO: _____</b>	<b>NO<sub>x</sub>: <u>0.7</u></b>	<b>PM<sub>10</sub>: _____</b>	<b>SO<sub>2</sub>: _____</b>	<b>VOC: _____</b>

**XI. DERC INFORMATION**

Name of the DERC Generator: Dow Texas Operations Freeport  
 DERC Generator Regulated Entity Number: RN100225945  
 Certificate number of the DERCS acquired or to be acquired: D-3302  
*Note: The certificate number is assigned by the TCEQ*

**XII. CERTIFICATION BY RESPONSIBLE OFFICIAL**

I, Tammy Grover, 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:  Date: 07 December 2018  
 Title Lead Environmental Engineer

Calculation of Discrete Emission Reduction Credits (DERCs)

Use Period Start: 4/1/2018 Use Period End: 9/30/2018

Date	MWhs Generation (MWhs)	Heat Input (MMBtu)	30 day Rolling Avg NO <sub>x</sub> Emissions CEMS (lbs/day)	Expected Emission Rate (lb/MMBtu)	Regulatory Limit System Cap per 117.320 (lbs NO <sub>x</sub> /day)	Difference (lbs NO <sub>x</sub> )	DERCs (tons)	Environmental Contribution - 10% (tons)	Compliance Margin - 5% (tons)	Total DERCs Required (tons)
4/27/2018	1,535	18753.1	525.6	0.029	218.9	306.7	0.15	0.02	0.01	0.18
4/28/2018	412	5037.3	341.6	0.029	218.9	122.7	0.06	0.01	0.00	0.07
5/31/2018	863	10543.1	258.9	0.029	218.9	40.0	0.02	0.00	0.00	0.02
6/5/2018	1,019	12454	311.4	0.029	218.9	92.5	0.05	0.00	0.00	0.05
6/6/2018	530	6476	234.0	0.029	218.9	15.1	0.01	0.00	0.00	0.01
7/19/2018	877	10716.2	221.5	0.029	218.9	2.6	0.00	0.00	0.00	0.00
7/20/2018	500	6,108	220.4	0.029	218.9	1.5	0.00	0.00	0.00	0.00
7/26/2018	802	9,796	240.8	0.029	218.9	21.9	0.01	0.00	0.00	0.01
7/27/2018	560	6,841	239.8	0.029	218.9	20.9	0.01	0.00	0.00	0.01
7/28/2018	1,178	14,392	262.5	0.029	218.9	43.6	0.02	0.00	0.00	0.03
7/29/2018	975	11,919	276.8	0.029	218.9	57.9	0.03	0.00	0.00	0.03
7/30/2018	550	6,717	272.1	0.029	218.9	53.2	0.03	0.00	0.00	0.03
8/7/2018	730	8,918	222.2	0.029	218.9	3.3	0.00	0.00	0.00	0.00
8/13/2018	907	11,082	275.5	0.029	218.9	56.6	0.03	0.00	0.00	0.03
8/17/2018	704	8,607	242.3	0.029	218.9	23.4	0.01	0.00	0.00	0.01
8/18/2018	1,096	13,393	268.8	0.029	218.9	49.9	0.02	0.00	0.00	0.03
8/19/2018	897	10,967	252.6	0.029	218.9	33.7	0.02	0.00	0.00	0.02
8/20/2018	590	7,206	246.7	0.029	218.9	27.8	0.01	0.00	0.00	0.02
9/15/2018	706	8,629	225.9	0.029	218.9	7.0	0.00	0.00	0.00	0.00
9/16/2018	933	11,395	251.1	0.029	218.9	32.2	0.02	0.00	0.00	0.02
9/17/2018	785	9,588	241.8	0.029	218.9	22.9	0.01	0.00	0.00	0.01
9/18/2018	717	8,756	236.0	0.029	218.9	17.1	0.01	0.00	0.00	0.01
9/25/2018	1,120	13,681	235.5	0.029	218.9	16.6	0.01	0.00	0.00	0.01

1,069.1 0.53

<b>Total for Use Period:</b>	0.6	0.1	0.1	0.7
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Heat Rate: 12,220 Btu/kwh

Calculation based upon the DERC calculation in 101.376(e)(2)

Dates only include days where emissions exceeded 30 day rolling average (218.9 lbs NO<sub>x</sub>/day)

MWhs Generation is total for all 4 emission units

Established system cap of 218.9 lbs Nox/day established per 117.320

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 29, 2019

Tammy B. Grover  
Lead Environmental Engineer  
Air Products LLC  
10202 Strang Road  
La Porte, Texas 77571  
Via email

Subject: Use of Discrete Emission Credits  
Air Products LLC  
Air Products La Porte Plant  
Customer Number: CN602299257  
Regulated Entity Number: RN102041282  
EBT Portfolio Number: P0026  
Project Number: 413516

Dear Tammy B. Grover:

This letter is in response to the Notice of Intent to Use Discrete Emission Credits submitted on February 9, 2018 and the Notice of Use of Discrete Emission Credits submitted on December 7, 2018 regarding the use of nitrogen oxides (NO<sub>x</sub>) discrete emission reduction credits (DERCs) for compliance with the 30-day rolling average NO<sub>x</sub> system cap under 30 Texas Administrative Code (TAC) §117.320(c). The Texas Commission on Environmental Quality (TCEQ) is approving the DERC use as summarized below. Any retained certificates are now available for future use or trade as allowed under 30 TAC Chapter 101, Subchapter H, Division 4.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Amount Used (tons)	Retained Certificate	Amount Retained (tons)
NO <sub>x</sub>	04/01/2018-09/30/2018	D3088	20.1	0.0	D3400	20.1
NO <sub>x</sub>	04/01/2018-09/30/2018	D3302	2.6	0.7	D3399	1.9

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 EBT program, please contact Joseph Musa at (512) 239-3328 or [joseph.musa@tceq.texas.gov](mailto:joseph.musa@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, appearing to read "D. Huff".

Donna F. Huff, Director  
Air Quality Division

Tammy B. Grover  
Page 2  
January 29, 2019

cc: Thomas Igo, ASU Operations Manager, Air Products LLC, La Porte  
Bob Allen, Director, Harris County, Pollution Control Services, Pasadena