

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 22, 2014

MR MICHAEL J SAUERS
ENGINEERING ASSOCIATE
AIR PRODUCTS LLC
7201 HAMILTON BLVD
ALLENTOWN PA 18195

Re: Cancellation of Air Quality Permit Number: 20659
Customer Number: CN602299257
Regulated Entity Number: RN100221324

Dear Mr. Sauers:

We are in receipt of your letter received December 12, 2013, regarding the facility listed above. We understand that this plant has been dismantled. Accordingly, Permit Number 20659 has been voided and our records have been updated to reflect this change.

Permit Number: 20659
County: Harris
Permittee/Registrant: Air Products LLC

Thank you for informing us of the cancellation. If you have any questions regarding this letter, please feel free to contact me at (512) 239-1228.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Leavitt", with a stylized flourish at the end.

Cameron Leavitt
Air Permits Initial Review Team (MC-161)
Air Permits Division

cc: Chief Health Inspector, Health Department, City of Pasadena, Pasadena
Director, Harris County, Pollution Control Services, Pasadena
Air Section Manager, Region 12 - Houston
TCEQ Central Records (MC-198)

Air Products LLC
1423 Pasadena Freeway
Pasadena, TX 77506
T 713-477-6841

AIR PERMITS DIVISION

DEC 12 2013

RECEIVED



via Fed Ex Shipment

December 10, 2013

Texas Commission on Environmental Quality
Air Quality Division
Emission Banking and Trading Program - MC-206
12100 Park 35 Circle
Austin, Texas 78753

Re: Air Products LLC - Pasadena: RN100221324
ARI incinerator control device shutdown
NSR Permit Voidance and ERC certification Application

602299257
~~12/10/13~~

Dear Sir or Madam,

Enclosed please find enclosed an Application for Certification of Emission Credits (completed TCEQ EC-1 forms and supporting documentation) along with an associated NSR Air Permit/Registration Void Request for the following NSR permit at our Pasadena, TX facility:

Permit number 20659, ARI Incinerator

If you have any questions on the attached please contact David Emerson at 817-526-5067, email emersdc@airproducts.com, or Michael Sauers in our Environmental Group at (610) 481-4317 or email sauersmi@airproducts.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Wilbur W. Mok".

Wilbur W. Mok
Vice President
Air Products LLC

Enclosures

c: TCEQ Air Section Manager, Air Program
OCE/FO Region XII
5425 Polk St., Ste. H, Houston, TX 77023-1452

TCEQ Air Permit Initial Review Team (APIRT)
Air Permits Division, MC 161
12100 Park 35 Circle, Austin, TX 78753



**Texas Commission on Environmental Quality
NSR Air Permit/Registration Void Request Worksheet**

CN602299257

I. APPLICANT INFORMATION		
Current Owner: <u>Air Products LLC</u>		
Company Contact Name: <u>Mr. Michael J. Sauers</u>		Title: <u>Engineering Associate</u>
Company Contact Mailing Address: <u>7201 Hamilton Boulevard</u>		
City: <u>Allentown</u>	State: <u>PA</u>	ZIP Code: <u>18195</u>
Phone: <u>(610) 481-4317</u>	Fax: <u>(610) 481-6186</u>	E-mail: <u>sauersmj@airproducts.com</u>
TCEQ Regulated Entity Number: <u>RN100221324</u>		
Effective Date of Voidance: <u>11/14/2013</u>		
II. REGISTRATIONS/PERMITS TO VOID (list each registration/permit number)		
<u>NSR Permit 20659</u>		
III. REASON FOR VOID		
<u> </u> Consolidation <u> </u> Time Expired <input checked="" type="checkbox"/> Plant Dismantled		
Other: <u> </u>		
IV. AUTHORIZATION SIGNATURE		
<u>I, Wilbur W. Mok</u> , certify that I am the responsible		
official for this application and that, based on information and belief formed after reasonable inquiry, the		
statements and information on this form are true, accurate, and complete. I further understand that any		
permits voided at my request will not be eligible for reactivation.		
Signature: <u>[Signature]</u>		Date: <u>12/10/13</u>
Title: <u>Vice President</u>		

PROJECT # 203428



Form EC-1 (Page 1)
Application for Certification of Emission Credits
(Title 30 Texas Administrative Code § 101.300 - § 101.311)

I. Company Identifying Information			
A. Company Name: Air Products LLC			
Mailing Address: PO BOX 3326			
City: Pasadena	State: TX	Zip Code: 77501-3326	
Telephone: (713) 477-6841		Fax: (610) 481-2182	
B. TCEQ Customer Number (CN): CN602299257			
C. Site Name: Air Products Pasadena Plant			
Street Address: 1423 Pasadena Freeway			
Nearest City: Pasadena	Zip Code: 77506	County: Harris	
D. TCEQ Regulated Entity Number (RN): RN100221324			
E. Primary SIC: 2869		Air Permit Number: 20659	
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.)			
Technical Contact Title: Michael J Sauers			
Mailing Address: 7201 Hamilton Boulevard			
City: Allentown	State: PA	Zip Code: 18195	
Telephone: (610) 481-4317	Fax: (610) 481-6186	E-mail: sauersmj@airproducts.com	
III. Contact for Sale of Certificate			
A. Business Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)			
Business Contact Title: Michael J Peters			
Mailing Address: 7201 Hamilton Boulevard			
City: Allentown	State: PA	Zip Code: 18195	
Telephone: (610) 481-2538	Fax: (610) 481-2182	E-mail: petersmj@airproducts.com	
IV. Generation Activity			
X Shutdown Additional Control Other:			
Describe reduction activity: Unit permanently shut down and decommissioned			
Date of Shutdown: 11/14/2013		Submitted Permit Void Request Date of Reduction: 11/14/2013	
Has production shifted from the shutdown facility to another facility in the same site? Yes <input checked="" type="checkbox"/> No			



Form EC-1 (Page 2)
Application for Certification of Emission Credits
(Title 30 Texas Administrative Code § 101.300 - § 101.311)

Calculation of VOC ERCs		EPN	805	
		FIN	800, 800W/WTP	
		Description	Incinerator	
		Pollutant	VOC	
Historical Data - Baseline Period				
Baseline Activity Total	2011	5.95	MMscf	Natural Gas Flow to Flare ¹
Baseline Activity	2011	8,609	hrs	Annual Operating Hours
Emission Factor	2011	5.5	lb/MMscf	Natural Gas ²
Baseline Emissions Total	2011	0.02	tpy	Actual Tons
Allowable Emissions	2011	0.1	tpy	Permitted Tons
Baseline Activity Emissions Total	2012	6.67	MMscf	Natural Gas Flow to Flare ¹
Baseline Activity	2012	8,763	hrs	Annual Operating Hours
Emission Factor	2012	5.5	lb/MMscf	Natural Gas ²
Baseline Activity Emissions Total	2012	0.02	tpy	Actual Tons
Allowable Emissions	2012	0.1	tpy	Permitted Tons
Baseline Emissions Average		0.01	VOC Tons	Baseline < Allowable Emissions
Historical Data - AEI for SIP				
Emission Inventory SIP		AEI 2006	confirmed by TCEQ on 07/19/2012 - Joseph Thomas	
AEI Emissions		0.01	VOC Tons	Baseline < Allowable Emissions
Emission Reduction Credit for Shutdown				
Creditable ERC is the lower of Baseline Emissions average and Emission Inventory SIP				
CREDITABLE ERCs		0.01		

¹Fuel flow measured using monitor.

² AP-42 TABLE 1.4-2, p. 1.4-6 - July 1998.

Total NOx Emission Reduction Credit for Shutdown	
Creditable ERC is the lower of Baseline Emissions average and Emission Inventory SIP	
CREDITABLE ERCs	3.96
Total VOC Emission Reduction Credit for Shutdown	
Creditable ERC is the lower of Baseline Emissions average and Emission Inventory SIP	
CREDITABLE ERCs	0.01

Attachment A - Checklist for DERC Certification Please check the appropriate box.		Applicant
Administrative Information - This information is provided, but not required to be submitted to the TCEQ.		
Is the Form EC-1 being submitted within 180 days from the end of the generation period?		X
Have you provided verification as to whether production shifted from the facility receiving credit to another facility on the same site?		X
Emission reduction strategy emission rate (unless credit will be generated from a shutdown)		N/A
Is information showing the enforceable mechanism for each EPN/FIN included?		X
Is a list of all applicable Permit and Permit by Rule numbers for each EPN/FIN included?		X
Is a copy of the Emissions Inventory from the most recent year of emissions inventory used for SIP determinations for each EPN/FIN included?		X
Is a copy of the Emissions Inventory for the two consecutive calendar years used for the baseline period for each EPN/FIN included?		X
Is a complete description of the calculation protocols used to determine the amount of credit requested included?		X
Is a statement containing an explanation of how the credit is real, surplus, and quantifiable included?		X
Is a list all rule citations for any applicable local, state or federal requirements included? a tank may have a state and a federal requirement. Therefore, listing the TCEQ Chapter 115 rule citation that applies along with the EPA NSPS K, Ka, or Kb should all be listed. This should be done for each EPN/FIN.		X
State whether or not each EPN/FIN is subject to the Mass Emissions Cap and Trade program or any other cap and trade program. If yes, have you taken a permanent reduction in your allowances?		X
Technical Review Requirements		
Is the reduction strategy or shutdown description included?		X
If VOC reduction, is a speciated VOC and HAP list and amounts included?		X
Is the baseline emission activity (ex. fuel usage records, production, use, throughput, and hours of operation) included?		X
Is the baseline emission rate (ex. emission rate from CEMS or PEMS, guaranteed by vendor, NSR calculation protocol, AP-42) included?		X
The most stringent emission rate or standard applicable to each EPN/FIN considering all local, state and federal requirements (ex. RACT, ESAD, NSPS, NESHAPS, MACT, etc.)		Permit
Is the backup documentation for the two consecutive calendar years of baseline activity such as production records, or use records, operating logs, or heat input included?		X
Are calculations for each EPN/FIN to show how each credit generation amount was determined using the equation in §101.303(b)(1) included?		X
Is backup documentation for the baseline emission rate or factor such as CEMS, PEMS, stack test data, or vendor guarantee included?		CEMS provided with application
Is NSPS applicable? If yes, note the part(s)?		N/A
Is NESHAPS applicable? If yes, what part(s)?		N/A
Is there a MACT standard for these facilities? If yes, what part(s)?		N/A
Does RACT apply? If yes, what part(s)?		N/A

Application for Certification of Emission Credits
(Title 30 Texas Administrative Code § 101.300 - § 101.311)

VOC

2011 = (VOC from fuel) = 5.95 MMscf/yr (Natural Gas flow to flare) * 5.5 lb/MMscf (Natural Gas EF) / 2000 = 0.02 tpy

2011: total VOC = 0.02 tons

2012: Permit allowable emissions = 0.1 tpy

2011: 0.02 tons

2012 = (VOC from fuel) = 66.7 MMscf/yr (Natural Gas flow to flare) * 5.5 lb/MMscf (Natural Gas EF) / 2000 = 0.02 tpy

2012: total VOC = 0.02 tons

2012: Permit allowable emissions = 0.1 tpy

2012: 0.02 tons

Baseline Average Emissions (Actual Emissions) = 0.02 tons VOC

Baseline Average Emissions are slightly less than SIP AEI value which is 0.01 tons; therefore ERCs are equal to Baseline Average Emissions.

ERCs = 0.01 tons

Total NOx Emission Reduction Credit for Shutdown	
Creditable ERC is the lower of Baseline Emissions average and Emission Inventory SIP	
CREDITABLE ERCs	3.96
Total VOC Emission Reduction Credit for Shutdown	
Creditable ERC is the lower of Baseline Emissions average and Emission Inventory SIP	
CREDITABLE ERCs	0.01

Application for Certification of Emission Credits
(Title 30 Texas Administrative Code § 101.300 - § 101.311)
2006 Emission Inventory for SIP

EPN 805

Page: 171

RN:RN100221324 Account:HG0011L

Company:AIR PRODUCTS LLC EIQ

Year:2006

FIN:800 WWTP EPN:805

Comment:PROCESS RATE BASED ON WASTERWATER

FLOW

CONTROL DEVICE INFORMATION

*CIN:805 AR1 Name:805 AR1

Abatement Code: 502 Desc: AFTERBURNERS,CATALYTIC

No. Of Units: 1 Annual Operating Hrs:8760 % Time Off Line: 0 IM

Schedule:D

Control Efficiencies:

VOC: 99.00% NOX: 0.00% CO: 80.00% IOC: 0.00%

TSP: 0.00% PM10: 0.00% SO2: 0.00% Cl-C3: 0.00%

C4+: 0.00% H2S: 0.00% NH3:

0.00%

EMISSIONS

FACTORS

Total Annual Aggregate Heat Input: MMBTU (Combustion Units Only)

Criteria Pollutant Emissions Factor Emissions Factor Units Reference/Source

VOC

NOX

CO

SO2

TSP

EMISSIONS INFORMATION			Method				
Code	Cas #	Contaminant	Annual (TPY)	Ozone (PPD)	SMSS (TPY)	EE (TPY)	EE/SM SS
58	7490	HYDROGEN CYANIDE	M 0.0002	0.0013	0.0000	0.0000	0.0000
240	8	AS					
70	0	NITROGEN OXIDES	D 3.7749	20.6844	0.0000	0.0000	0.0000
400							
70	1002	NITROUS OXIDE	M 81.4700	446.4110	0.0000	0.0000	0.0000
403	497						

Application for Certification of Emission Credits
(Title 30 Texas Administrative Code § 101.300 - § 101.311)
Fuel Flow CEMS data example for EPN 805

FI2060
ARI Nat
Gas
SCFH

1-Jan	609.76
2-Jan	631.75
3-Jan	614.84
4-Jan	592.66
5-Jan	560.91
6-Jan	594.85
7-Jan	590.86
8-Jan	595.81
9-Jan	733.77
10-Jan	584.61
11-Jan	587.89
12-Jan	631.20
13-Jan	638.12
14-Jan	634.14
15-Jan	724.69
16-Jan	630.93
17-Jan	645.01
18-Jan	590.74
19-Jan	520.62
20-Jan	623.73
21-Jan	677.97
22-Jan	619.22
23-Jan	605.59
24-Jan	615.61
25-Jan	624.00
26-Jan	623.11
27-Jan	611.57
28-Jan	597.39
29-Jan	596.89
30-Jan	636.49
31-Jan	624.19

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30**01/15/2014 -----NSR IMS - PROJECT RECORD -----**

PROJECT#: 203428 **PERMIT#:** **STATUS:** COMPLETE **DISP CODE:** _____
RECEIVED: 12/12/2013 **PROJTYPE:** VOIDPMT **AUTHTYPE:** **ISSUED DT:** 01/15/2014
RENEWAL:
PROJECT ADMIN NAME: VOID
PROJECT TECH NAME: VOID
STAFF ASSIGNED TO PROJECT:
LEAVITT , CAMERON - REVIEWR1_2 - AP INITIAL REVIEW

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)

ISSUED TO: AIR PRODUCTS LLC
COMPANY NAME: Air Products LLC
CUSTOMER REFERENCE NUMBER: CN602299257

REGULATED ENTITY/SITE INFORMATION

REGULATED ENTITY NUMBER: RN100221324 **ACCOUNT:** HG0011L
PERMIT NAME:

REGULATED ENTITY LOCATION: 1423 PASADENA FWY
REGION 12 - HOUSTON **NEAR CITY:** PASADENA **COUNTY:** HARRIS

PROJECT NOTES:

12/23/2013 MICHAEL J SAUERS ENGINEERING ASSOCIATE 610-481-4317
SAUERSMJ@AIRPRODUCTS.COM

PERMIT NOTES:**PERMIT VOIDS:**

Permit	Void Reason
20659	PLANT DISMANTLED