

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 26, 2021

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

Subject: Notice of Intent to Use Discrete Emission Credits
Air Products LLC
Air Products La Porte Plant
Customer Number: CN602299257
Regulated Entity Number: RN102041282
EBT Portfolio Number: P0026
Project Number: 415883

Dear Tammy Grover:

In response to your Notice of Intent to Use Discrete Emission Credits submitted on February 4, 2021, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for compliance with 30 Texas Administrative Code (TAC) §117.320(c)(2). A Notice of Use of Discrete Emission Credits application must be submitted within 90 days after the end of the use period. Any retained certificates are now available for future use or trade as allowed under 30 Texas Administrative Code Chapter 101, Subchapter H, Division 4.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Retained Certificate	Amount Retained (tons)
NO _x	04/01/2021 - 09/30/2021	D-3489	16.7	D-3523	4.4
NO _x	04/01/2021 - 09/30/2021	D-3475	6.0	N/A	N/A

Additional information regarding this project and the site's portfolio is available online at https://www2.tceq.texas.gov/airperm/index.cfm?fuseaction=ebt_dpa.start. If you have questions concerning this project or the EBT program, please contact Gabriel Garcia at gabriel.garcia@tceq.texas.gov, or write to the TCEQ, Office of Air, Air Permits Division, MC-163, 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 "Samuel Short", with a long horizontal flourish extending to the right.

Samuel Short, Deputy Director
Air Permits Division

cc: Thomas Igo, ASU Operations Manager, Air Products LLC
Latrice Babin, Director, Harris County Pollution Control Services Department

Discrete Emission Reduction Credit (DERC) Intent to Use Technical Review

Project Number:	415883	Project Manager:	Gabriel Garcia
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:	02/04/2021
Intent Amount and Certificate(s):	16.7 tons from certificates D-3489; 6.0 tons from certificates D-3475
Pollutant:	NO _x
Reason for Use:	30 Texas Administrative Code (TAC) §117.320(c)(2)
Use period:	04/01/2021 - 09/30/2021
Retained Amount and Certificate(s):	4.4 tons retained in certificate D-3523
Additional Information:	The application was submitted for compliance with the 30-day rolling average NO _x system cap under 30 TAC §117.320(c)(2). Excess emissions from four gas turbines at the site will be covered by these NO _x DERCs.

Calculation Methodology

The 30-day rolling average system cap limit was established under 30 TAC §117.320(c)(2). 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 30 TAC §117.310(a)(10)(A), 0.032 pound per MMBtu (lb/MMBtu), to establish the 218.9 lb NO_x/day limit (see the technical review for project number 412219). According to the company, the system cap limit is the same for the fourth quarter months and the first quarter months.

Per 30 TAC §101.376(d)(2)(A)(i), the amount of discrete emission credits needed to demonstrate compliance with a rolling average cap is calculated as follows:

$$DERCs\ needed = \sum_{i=1}^N [(EH_i \times ER_i) - (H_i \times R_i)] \times \left(\frac{d}{2000}\right)$$

Where:

N = the total number of emission units in the source or system cap

i = each emission unit in the source or system cap

EH_i = expected new daily heat input, in MMBtu/day

ER_i = expected new emission rate, in lb/MMBtu

H_i = actual daily heat input, in MMBtu per day, as calculated according to §117.320(c)(2)

R_i = emission specification in lb/MMBtu, as defined in §117.320(c)(2)

d = the number of days that emissions are expected to exceed the source or system cap

The expected new daily heat input (EH_i) per unit was calculated using the maximum heat input for each turbine:

$$EH_i = \left(467 \frac{MMBtu}{hr}\right) \left(8 \frac{hrs}{day}\right) = \left(3,736 \frac{MMBtu}{day}\right)$$

The estimated level of activity from 04/01/2021 through 09/30/2021 is 3,736 MMBtu/day for each of the four 38-MW turbines, totaling 14,944 MMBtu/day. Each turbine is permitted (Permit No. 21878) at an expected emission rate of 0.029 lb/MMBtu. Therefore, the expected new daily total emissions for the units are estimated at 14,944 MMBtu/day x 0.029 lb/MMBtu, or 433.4 lb NO_x/day. There are 183 days in the use period.

$$DERCs\ needed = \left[\left(433.4 \frac{lb}{day}\right)^A - \left(218.9 \frac{lb}{day}\right)^B \right] \times \frac{183\ days}{2000\ lbs/ton} = 19.63\ tons$$

^A Expected new daily NO_x total emissions for all 4 units; equivalent to 4*(EH_i x ER_i) in the equation.

^B Regulatory NO_x system cap per §117.320(c)(2); equivalent to 4*(H_i x R_i) in the equation.

The total emissions over the system cap for this use period are rounded up to the nearest tenth of a ton at 19.7 tons. With the additional 10% environmental contribution (2.0 tons) and 5% compliance margin (1.0 ton), a total of 22.7 tons of NO_x DERCs is required to be set aside for the intent project.

Conclusion

The TCEQ is approving the request to set aside 22.7 tons of NO_x DERCs from certificate(s) D-3489, D-3475 for compliance with 30 TAC §117.320(c)(2) during the use period of 04/01/2021 - 09/30/2021.

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02/26/2021 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 415883 STATUS: C DISP CODE: _____
RECEIVED: 02/04/2021 PROJTYPE: BDIU ISSUED DT: 02/26/2021
SUP-DISP DATE: 02/26/2021

STAFF ASSIGNED TO PROJECT:
GARCIA, GABRIEL

PROJECT TRANSACTIONS

COMPANY DATA
COMPANY NAME: AIR PRODUCTS LLC
CUSTOMER REGISTRY ID: CN602299257

PORTFOLIO DATA
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: TAMMY B. GROVER TITLE: LEAD ENVIRONMENTAL ENGINEER
ROLE: AAR
STREET: 10202 STRANG ROAD
CITY/STATE,ZIP: LA PORTE, TX , 77571-
PHONE: 281-478-3172 -
EMAIL: GROVERTB@AIRPRODUCTS.COM

NAME: THOMAS IGO TITLE: ASU OPERATIONS MANAGER
ROLE: TECHNICAL
STREET:
CITY/STATE,ZIP:
PHONE: 346-216-4070 -
EMAIL: IGOTW@AIRPRODUCTS.COM

TRANSACTION DATA
TRANSACTION TYPE: DERC_INTEN
DATE ENTERED: 2021-02-04 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE0
DELETED DATE: EFFECTIVE YEAR:
TONS: 16.70 DOLLARS: 0
CERTIFICATE NO.: D3489 COUNTY : HARRIS

TRANSACTION DATA
TRANSACTION TYPE: DERC_RET
DATE ENTERED: 2021-02-04 00:00:00.0
CONTAMINATE: NOX
ALLOWANCE0
DELETED DATE: EFFECTIVE YEAR:
TONS: 4.40 DOLLARS: 0
CERTIFICATE NO.: D3523 COUNTY : HARRIS

COMPANY DATA

COMPANY NAME: AIR PRODUCTS LLC
CUSTOMER REGISTRY ID: CN602299257

PORTFOLIO DATA

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: TAMMY B. GROVER TITLE: LEAD ENVIRONMENTAL ENGINEER
ROLE: AAR
STREET: 10202 STRANG ROAD
CITY/STATE, ZIP: LA PORTE, TX , 77571-
PHONE: 281-478-3172 -
EMAIL: GROVERTB@AIRPRODUCTS.COM

NAME: THOMAS IGO TITLE: ASU OPERATIONS MANAGER
ROLE: TECHNICAL
STREET:
CITY/STATE, ZIP:
PHONE: 346-216-4070 -
EMAIL: IGOTW@AIRPRODUCTS.COM

TRANSACTION DATA

TRANSACTION TYPE: DERC_INTEN
DATE ENTERED: 2021-02-17 00:00:00.0 DELETED DATE: EFFECTIVE YEAR:
CONTAMINATE: **NOX** TONS: **6.00** DOLLARS: **0**
ALLOWANCE0 CERTIFICATE NO.: **D3475** COUNTY : **HARRIS**

TRACKING ACTIVITIES

PM RECEIVED DATE : 02/04/2021 PROJECT SUBMITTED : 02/04/2021
SECTION MANAGER REVIEW : 02/23/2021 02/24/2021
PROJECT COMPLETED : 02/26/2021

Logged In As: GAGARCIA

Date: 02/26/21

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Portfolio Detail

Portfolio Number: P0026
Portfolio Name: AIR PRODUCTS LA PORTE PLANT - RN102041282
Company Name: AIR PRODUCTS LLC

Actual Allowances for Pollutant NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Penalty from last year	0	0	0	0	0	0	0
Certified Allocation	25	25	25	25	25	25	25
Allowances for Offsets	-0	-0	-0	-0	-0	-0	-0
Future Trade In	0	0	0	0	0	0	0
Future Trade Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	7.4	7.4	7.4	7.4	7.4	7.4	7.4
Stream Traded Out	-0	-0	-0	-0	-0	-0	-0
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-22.1	-30.1	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	-22.1	-30.1	-0	-0	-0	-0	-0
Vintage From Previous Year	9.7	10.3	2.3	0	0	0	0
Vintage Traded In	0	0	0	0	0	0	0
Vintage Traded Out	-0	-0	-0	-0	-0	-0	-0
Vintage Used for Compliance	-0	-0	-0	-0	-0	-0	-0
DERC Intent	0	0	0	0	0	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
CURRENT ALLOWANCE BALANCE	10.3	2.3	32.4	32.4	32.4	32.4	32.4
VINTAGE ALLOWANCE BALANCE	9.7	10.3	2.3	0	0	0	0

Allowable Allowances

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0

Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0
Starting Allowance for **	0	0	0	0	0	0	0
Deficit	0	0	0	0	0	0	0
Actual Emissions	-0	-0	-0	-0	-0	-0	-0
Quantification Penalty	0	0	0	0	0	0	0
BALANCE	0	0	0	0	0	0	0

** This fin was recertified.

Flexible Allowances for Pollutant NOX

Balance	2018	2019	2020	2021	2022	2023	2024
Flexible Allowance	0	0	0	0	0	0	0
Penalty	0	0	0	0	0	0	0
Associated Annual Emissions	-0	-0	-0	-0	-0	-0	-0
BALANCE	0	0	0	0	0	0	0

Sb7 Allowances for Pollutant NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Previous Year Deficit	0	0	0	0	0	0	0
Allowances Remaining from Previous Year	0	0	0	0	0	0	0
Allocation	0	0	0	0	0	0	0
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	0	0	0	0	0	0	0

Stream Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	0	0	0	0	0	0	0

DERC >

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
D2188	NOX	60.00	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2180
D2646	NOX	56.00	DERC_RET	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2594
D2647	NOX	0.50	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2594
D2648	NOX	55.80	DERC_RET	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2646
D2755	NOX	0.30	DERC_USE	04/25/2011	03/20/1999	11/15/1999	BRAZORIA	D2561
D2756	NOX	41.60	DERC_INTEN	08/01/2012	03/20/1999	11/15/1999	BRAZORIA	D2561
D2869	NOX	74.00	DERC_BUY	10/11/2013	01/01/2000	12/31/2000	BRAZORIA	D2779
D2907	NOX	32.70	DERC_INTEN	02/15/2017	03/20/1999	11/15/1999	BRAZORIA	D2841
D3088	NOX	22.50	DERC_INTEN	03/06/2018	01/01/2000	12/31/2000	BRAZORIA	D2953
D3302	NOX	2.60	DERC_INTEN	01/29/2019	03/20/1999	11/15/1999	BRAZORIA	D2951
D3355	NOX	2.40	DERC_RET	07/26/2019	01/01/2000	12/31/2000	BRAZORIA	D3088
D3406	NOX	1.60	DERC_INTEN	08/24/2020	03/20/1999	11/15/1999	BRAZORIA	D3399
D3509	NOX	0.20	DERC_USE	02/08/2021	03/20/1999	11/15/1999	BRAZORIA	D3229
D2572	NOX	40.00	DERC_BUY	01/05/2011	11/01/1994	12/31/1997	BRAZORIA	D2189
D2594	NOX	56.50	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2188
D2594	NOX	56.50	DERC_RET	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2188
D2652	NOX	50.60	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2650
D2653	NOX	2.90	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2650
D2657	NOX	0.10	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2654
D2738	NOX	13.70	DERC_RET	01/04/2012	03/20/1999	11/15/1999	BRAZORIA	D2659
D2754	NOX	0.20	DERC_USE	09/14/2011	01/11/1994	12/31/1997	BRAZORIA	D2658
D2796	NOX	9.00	DERC_INTEN	01/14/2016	03/20/1999	11/15/1999	BRAZORIA	D2795
D2842	NOX	10.10	DERC_INTEN	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D2841
D3217	NOX	8.60	DERC_RET	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D2796
D3229	NOX	10.00	DERC_RET	02/08/2021	03/20/1999	11/15/1999	BRAZORIA	D2907
D3288	NOX	22.40	DERC_INTEN	01/09/2020	03/20/1999	11/15/1999	BRAZORIA	D2907
D3322	NOX	22.40	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3065
D3370	NOX	0.80	DERC_USE	07/02/2018	01/01/2000	12/31/2000	BRAZORIA	D3107
D3399	NOX	1.90	DERC_RET	01/09/2020	03/20/1999	11/15/1999	BRAZORIA	D3302
D3428	NOX	0.20	DERC_USE	07/26/2019	01/01/2000	12/31/2000	BRAZORIA	D3355
D3439	NOX	1.10	DERC_RET	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D3406
D3468	NOX	1.90	DERC_USE	01/09/2020	03/20/1999	11/15/1999	BRAZORIA	D3288
D2593	NOX	0.40	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2188
D2654	NOX	49.40	DERC_RET	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2652
D2656	NOX	49.30	DERC_RET	09/09/2010	08/01/1995	12/31/1997	BRAZORIA	D2654

D2839	NOX	1.10	DERC_USE	01/04/2012	03/20/1999	11/15/1999	BRAZORIA	D2738
D2952	NOX	0.50	DERC_USE	01/14/2013	03/20/1999	11/15/1999	BRAZORIA	D2904
D3065	NOX	22.50	DERC_INTEN	06/28/2017	01/01/2000	12/31/2000	BRAZORIA	D2869
D3107	NOX	6.00	DERC_RET	07/02/2018	01/01/2000	12/31/2000	BRAZORIA	D3066
D3125	NOX	0.40	DERC_USE	09/19/2014	01/01/2000	12/31/2000	BRAZORIA	D3002
D3216	NOX	0.40	DERC_USE	01/14/2016	03/20/1999	11/15/1999	BRAZORIA	D2796
D3267	NOX	0.10	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3153
D3322	NOX	22.40	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3065
D3371	NOX	5.20	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3107
D2208	NOX	3.10	DERC_INTEN	09/09/2010	08/01/1995	12/31/1997	BRAZORIA	D2188
D2648	NOX	55.80	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2646
D2659	NOX	58.10	DERC_INTEN	09/06/2011	03/20/1999	11/15/1999	BRAZORIA	D2561
D2723	NOX	0.30	DERC_USE	01/05/2011	11/01/1994	12/31/1997	BRAZORIA	D2572
D2795	NOX	12.60	DERC_RET	08/01/2012	03/20/1999	11/15/1999	BRAZORIA	D2738
D2796	NOX	9.00	DERC_RET	01/14/2016	03/20/1999	11/15/1999	BRAZORIA	D2795
D2869	NOX	74.00	DERC_INTEN	10/11/2013	01/01/2000	12/31/2000	BRAZORIA	D2779
D2905	NOX	1.00	DERC_USE	08/02/2012	03/20/1999	11/15/1999	BRAZORIA	D2841
D2953	NOX	51.50	DERC_INTEN	01/13/2014	01/01/2000	12/31/2000	BRAZORIA	D2869
D2953	NOX	51.50	DERC_RET	01/13/2014	01/01/2000	12/31/2000	BRAZORIA	D2869
D3107	NOX	6.00	DERC_INTEN	07/02/2018	01/01/2000	12/31/2000	BRAZORIA	D3066
D3302	NOX	2.60	DERC_RET	01/29/2019	03/20/1999	11/15/1999	BRAZORIA	D2951
D3467	NOX	0.30	DERC_USE	01/09/2020	03/20/1999	11/15/1999	BRAZORIA	D3399
D2561	NOX	100.00	DERC_BUY	04/25/2011	03/20/1999	11/15/1999	BRAZORIA	D2456
D2650	NOX	53.50	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2648
D2738	NOX	13.70	DERC_INTEN	01/04/2012	03/20/1999	11/15/1999	BRAZORIA	D2659
D2795	NOX	12.60	DERC_INTEN	08/01/2012	03/20/1999	11/15/1999	BRAZORIA	D2738
D2840	NOX	0.60	DERC_USE	01/04/2012	03/20/1999	11/15/1999	BRAZORIA	D2794
D2842	NOX	10.10	DERC_RET	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D2841
D2907	NOX	32.70	DERC_RET	02/15/2017	03/20/1999	11/15/1999	BRAZORIA	D2841
D2951	NOX	2.80	DERC_INTEN	01/10/2018	03/20/1999	11/15/1999	BRAZORIA	D2904
D3088	NOX	22.50	DERC_RET	03/06/2018	01/01/2000	12/31/2000	BRAZORIA	D2953
D3229	NOX	10.00	DERC_INTEN	02/08/2021	03/20/1999	11/15/1999	BRAZORIA	D2907
D3288	NOX	22.40	DERC_RET	01/09/2020	03/20/1999	11/15/1999	BRAZORIA	D2907
D3355	NOX	2.40	DERC_INTEN	07/26/2019	01/01/2000	12/31/2000	BRAZORIA	D3088
D3380	NOX	2.00	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3355
D3398	NOX	0.70	DERC_USE	01/29/2019	03/20/1999	11/15/1999	BRAZORIA	D3302
D3400	NOX	20.10	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3088
D3406	NOX	1.60	DERC_RET	08/24/2020	03/20/1999	11/15/1999	BRAZORIA	D3399
D3490	NOX	0.50	DERC_USE	08/24/2020	03/20/1999	11/15/1999	BRAZORIA	D3406
D2208	NOX	3.10	DERC_RET	09/09/2010	08/01/1995	12/31/1997	BRAZORIA	D2188
D2646	NOX	56.00	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2594
D2650	NOX	53.50	DERC_RET	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2648
D2652	NOX	50.60	DERC_RET	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2650
D2655	NOX	1.20	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2652
D2656	NOX	49.30	DERC_INTEN	09/09/2010	08/01/1995	12/31/1997	BRAZORIA	D2654
D2659	NOX	58.10	DERC_RET	09/06/2011	03/20/1999	11/15/1999	BRAZORIA	D2561
D2756	NOX	41.60	DERC_RET	08/01/2012	03/20/1999	11/15/1999	BRAZORIA	D2561
D2805	NOX	10.90	DERC_RET	09/09/2010	01/11/1994	12/31/1997	BRAZORIA	D2658
D3066	NOX	6.20	DERC_RET	01/26/2015	01/01/2000	12/31/2000	BRAZORIA	D3002
D3153	NOX	0.20	DERC_RET	06/28/2017	01/01/2000	12/31/2000	BRAZORIA	D3066
D3399	NOX	1.90	DERC_INTEN	01/09/2020	03/20/1999	11/15/1999	BRAZORIA	D3302
D3489	NOX	21.10	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3126

D2561	NOX	100.00	DERC_INTEN	04/25/2011	03/20/1999	11/15/1999	BRAZORIA	D2456
D2649	NOX	0.20	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2646
D2654	NOX	49.40	DERC_INTEN	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2652
D2658	NOX	11.10	DERC_INTEN	09/14/2011	01/11/1994	12/31/1997	BRAZORIA	D2572
D2724	NOX	28.60	DERC_RET	09/09/2010	11/01/1994	12/31/1997	BRAZORIA	D2572
D2794	NOX	44.40	DERC_RET	01/04/2012	03/20/1999	11/15/1999	BRAZORIA	D2659
D2794	NOX	44.40	DERC_INTEN	01/04/2012	03/20/1999	11/15/1999	BRAZORIA	D2659
D2903	NOX	0.30	DERC_USE	08/01/2012	03/20/1999	11/15/1999	BRAZORIA	D2795
D2904	NOX	3.30	DERC_INTEN	01/14/2013	03/20/1999	11/15/1999	BRAZORIA	D2795
D3002	NOX	28.80	DERC_INTEN	09/19/2014	01/01/2000	12/31/2000	BRAZORIA	D2953
D3087	NOX	0.20	DERC_USE	01/13/2014	01/01/2000	12/31/2000	BRAZORIA	D2953
D3287	NOX	0.30	DERC_USE	02/15/2017	03/20/1999	11/15/1999	BRAZORIA	D2907
D3429	NOX	0.20	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3355
D3469	NOX	20.50	DERC_RET	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D3288
D3475	NOX	6.00	DERC_RET	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D3229
D3488	NOX	1.10	DERC_USE	08/24/2020	01/01/2000	12/31/2000	BRAZORIA	D3126
D2188	NOX	60.00	DERC_BUY	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2180
D2572	NOX	40.00	DERC_INTEN	01/05/2011	11/01/1994	12/31/1997	BRAZORIA	D2189
D2651	NOX	2.30	DERC_USE	10/27/2010	08/01/1995	12/31/1997	BRAZORIA	D2648
D2658	NOX	11.10	DERC_RET	09/14/2011	01/11/1994	12/31/1997	BRAZORIA	D2572
D2841	NOX	43.80	DERC_INTEN	08/02/2012	03/20/1999	11/15/1999	BRAZORIA	D2794
D2841	NOX	43.80	DERC_RET	08/02/2012	03/20/1999	11/15/1999	BRAZORIA	D2794
D2904	NOX	3.30	DERC_RET	01/14/2013	03/20/1999	11/15/1999	BRAZORIA	D2795
D2951	NOX	2.80	DERC_RET	01/10/2018	03/20/1999	11/15/1999	BRAZORIA	D2904
D3002	NOX	28.80	DERC_RET	09/19/2014	01/01/2000	12/31/2000	BRAZORIA	D2953
D3065	NOX	22.50	DERC_RET	06/28/2017	01/01/2000	12/31/2000	BRAZORIA	D2869
D3066	NOX	6.20	DERC_INTEN	01/26/2015	01/01/2000	12/31/2000	BRAZORIA	D3002
D3126	NOX	22.20	DERC_RET	08/24/2020	01/01/2000	12/31/2000	BRAZORIA	D3002
D3126	NOX	22.20	DERC_INTEN	08/24/2020	01/01/2000	12/31/2000	BRAZORIA	D3002
D3153	NOX	0.20	DERC_INTEN	06/28/2017	01/01/2000	12/31/2000	BRAZORIA	D3066
D3217	NOX	8.60	DERC_INTEN	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D2796
D3267	NOX	0.10	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3153
D3320	NOX	0.10	DERC_USE	06/28/2017	01/01/2000	12/31/2000	BRAZORIA	D3153
D3321	NOX	0.10	DERC_USE	06/28/2017	01/01/2000	12/31/2000	BRAZORIA	D3065
D3336	NOX	5.60	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3126
D3347	NOX	0.20	DERC_USE	01/10/2018	03/20/1999	11/15/1999	BRAZORIA	D2951
D3429	NOX	0.20	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3355
D3510	NOX	3.80	DERC_RET	12/30/3000	03/20/1999	11/15/1999	BRAZORIA	D3229

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
1042	NOX	71.20	ERC_INTEN	08/07/2006	08/07/1996	08/07/2006	HARRIS	0



Form DEC-2 (Page 1)
Notice of Intent to Use Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)

I. Company Identifying Information			
A. Company Name: Air Products LLC			
Mailing Address: 10202 Strang Road			
City: La Porte	State: TX	Zip Code: 77571	
Telephone: 281-478-5901		Fax: 281-478-3042	
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	
II. Technical Contact Identifying Information			
A. Technical Contact Name: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.) : Tammy Grover			
Technical Contact Title: Lead Environmental Engineer			
Mailing Address: 10202 Strang Road			
City: La Porte		State: TX	Zip Code: 77571
Telephone: 281-478-3172	Fax: 610-706-5140	E-mail: grovertb@airproducts.com	
III. Company Contact Identifying Information (If different from Technical Contact)			
A. Company Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : Thomas Igo			
Company Contact Title: ASU Operations Manager			
Mailing Address: 10202 Strang Rd.			
City: La Porte		State: TX	Zip Code: 77571
Telephone: 346-216-4070	Fax: 281-478-3042	E-mail: igotw@airproducts.com	
IV. Mass Emission Cap and Trade Program (MECT)			
Is the DERC use for compliance with 30 TAC Chapter 101 Subchapter H, Division 3? ☐ YES ☒ NO			
Year DERC Generated: _____ Year of Use: _____ Ratio of DERC to Allowance: _____ to _____			
Note: If DERC use is to comply with MECT then go to Section IX			
V. Intended Use Period			
Intended Use Start Date: 04 / 01 / 2021		Intended Use End Date: 09 / 30 / 2021	



Form DEC-2 (Page 2)
Notice of Intent to Use 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 §117.320- system cap

VII. Most Stringent Emission Rate

Describe basis for most stringent allowable emission rate:

☐ Permit _____ ☒ RACT 0.032 lb/MMBTU ☐ Other: _____

Notes:

ESAD 30 TAC §117.310(a)(10)(A)

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

See attached. Calculation per 30 TAC Chapter 101, Subchapter H – Emissions Banking and Trading, Division 4 Discrete Emission Banking and Trading – 30 TAC §101.376 (d)(2)(i)

Continue to Section IX (next page)



IX. Tons of DERCS Required								
Calculation of DERCS								
Emission Point No.	FIN	Air Contaminant	Expected Activity (units)	Expected Emission Rate (units)	Expected Total Emissions (tons)	Regulated Activity (units)	Regulated Emission Rate (units)	Regulated Total Emissions (tons)
GT-1	Pecogen1	NO _x						
GT-2	Pecogen2	NO _x						
GT-3	Pecogen3	NO _x						
GT-4	Pecogen4	NO _x						
								Total:



Form DEC-2 (Page 4)
Notice of Intent to Use 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. VII.)	CO: _____	NO _x : <u>19.7</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : <u>N/A</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : <u>2.0</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Compliance Margin (+ 5%) (If DERC use requires > 10 tons)	CO: _____	NO _x : <u>1.0</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCs	CO: _____	NO _x : <u>22.7</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____

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: D3489, D3475 (please consolidate)

Date on which the DERCs were acquired or will be acquired: 01/01/2000-12/31/2000

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 Tammy Grover P.E. Signature Date 2/3/21

Title Lead Environmental Engineer

Attachment: DERC Calculation to Satisfy Sections VII and VIII of Notice of Intent to Use, Form DEC-2

Calculation based upon the DERC calculation in 30 TAC §101.376(d)(2)(i):

$$\text{Amount of DERCs Required (tons)} = \sum_{i=1}^N \left[(EH_i \times ER_i) - (H_i \times R_i) \right] \times \left(\frac{d}{2000} \right)$$

Where:

d = the number of days in the use period

i = each emission unit in the source or system cap

N = the total number of emission units in the source or system cap

Hi = actual daily heat input, in million British thermal units (MMBtu) per day, as calculated according to 117.320(c)(1)

Ri = actual emission rate, in pounds (lb)/MMBtu, as defined in 117.320(c)(1)

EHi = expected new daily heat input, in MMBtu per day

ERi = expected new emission rate, in lb/MMBtu

Expected New Daily Heat Input = 4 units * 467 MMBtu/hr * 8 hr/day

Expected New Daily Total Emissions = 4 units * 467 MMBtu/hr * 8 hr/day * 0.029 lb NOx/MMBtu

Established system cap of 218.9 lbs NOx/day established per 30 TAC §117.320(c)(1) is the same for the 4th quarter months (November, December) and 1st quarter months (January, February, March).

Parameter	Quantity/Amount	Units	Equation Symbol
Number of Gas Turbines in System	4		<i>N</i>
Capacity (Each Gas Turbine)	38	MW	
Gas Turbine Maximum Heat Input	467	MMBtu/hr	
Expected Hours of Operation (Daily, hrs/day)	8	hours	
Expected New Daily Heat Input	14,944	MMBtu/ day	<i>EHi</i>
Expected New Emission Rate	0.029	lb/MMBtu	<i>ERi</i>
Expected New Daily Total Emissions	433.4	lbs NOx/day	
Regulatory Limit (System Cap per 30 TAC §117.320)	218.9	lbs NOx/day	<i>(Hi x Ri)</i>
Difference	214.5	lbs NOx/day	
Use Period Start Date:	4/1/2021		
Use Period End Date:	9/30/2021		
Use Period	183	days	<i>d</i>
DERCs Required	19.7	tons	
10% Compliance Contribution	2.0	tons	
5% Compliance Margin	1.0	tons	
Total DERCs Required	22.7	tons	

Regulated Entity Detail					
Regulated Entity Name:	AIR PRODUCTS LA PORTE PLANT			RN:	RN102041282
Status:	Active	Status Comment:		Stand Alone:	N
Physical Address:	10202 STRANG RD LA PORTE, TX 77571-9721			County:	HARRIS
Physical Location:	Key Maps - 539L				
Nearest City:	LA PORTE	State:	TX	Zip Code:	77571
Latitude:	29° 42 min 6 sec (29.701666)		Longitude:	95° 4 min 6 sec (-95.068330)	

1-5 of 5 Records

Affiliated Customers						List All
CN Number	Customer* 	Role	Begin Date	End Date	RE Comp Hist	
CN600381974	AIR PRODUCTS AND CHEMICALS INC	OWNER OPERATOR	10/21/1986	12/31/3000	HIGH	
CN601658347	AIR PRODUCTS INCORPORATED	OWNER OPERATOR	01/1/1800	12/31/3000	HIGH	
CN602299257	AIR PRODUCTS LLC	OWNER OPERATOR, RESPONSIBLE PARTY	08/29/2002	12/31/3000	SATISFACTORY	
CN601646110	AIR PRODUCTS LP	OWNER OPERATOR	01/1/1800	12/31/3000	HIGH	
CN600924195	AIRGAS-SOUTHWEST INC	OWNER OPERATOR	03/1/2002	12/31/3000	HIGH	

Page 1 2 > 1-50 of 60 Records

Program Interests									
Program	RE Type	ID Type	Addn ID	Addn ID Status	Alt RE Name	Role	Customer Name (CN)	Begin Date - End Date	View 'Issued To' History
AIR EMISSIONS INVENTORY	SITE	ACCOUNT NUMBER	HG0010N	ACTIVE					View
AIR NEW SOURCE PERMITS	SITE	EPA PERMIT	PSDTX911	CANCELLED		OWNER OPERATOR	Air Products Incorporated (CN601658347)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	38484	CANCELLED	AIR PRODUCTS LA PORTE PLANT	OWNER OPERATOR	Air Products Incorporated (CN601658347)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	3575	CANCELLED	AIR PRODUCTS LA PORTE PLANT	OWNER OPERATOR	Air Products Incorporated (CN601658347)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	3403	CANCELLED	LA PORTE TEXAS FACILITY	OWNER OPERATOR	Air Products Incorporated (CN601658347)	09/23/1995 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	2022	CANCELLED	LA PORTE TEXAS FACILITY	OWNER OPERATOR	Air Products Incorporated (CN601658347)	03/07/1997 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	40918	CANCELLED	LA PORTE TEXAS FACILITY	OWNER OPERATOR	Air Products and Chemicals, Inc. (CN600381974)	04/16/1999 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	43558	CANCELLED	LA PORTE TEXAS FACILITY	OWNER OPERATOR	Air Products, L.P. (CN601646110)	03/12/2000 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	44723	CANCELLED	LA PORTE TEXAS FACILITY	OWNER OPERATOR	Air Products, L.P. (CN601646110)	11/01/2001 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	11664	ACTIVE	AIR PRODUCTS LA PORTE PLANT	OWNER OPERATOR	Air Products LLC (CN602299257)	08/29/2002 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	11663	ACTIVE	AIR PRODUCTS LA PORTE PLANT	OWNER OPERATOR	Air Products LLC (CN602299257)	08/29/2002 - 12/31/3000	View

From: [APDDIR](#)
To: [Beryl Thatcher](#); [APDDIR](#)
Cc: [PSSMGR](#); [Melissa Ruano](#); [Gabriel Garcia](#)
Subject: RE: For Review and Approval by 02/26/2021: DERC Intent to Use 415883
Date: Friday, February 26, 2021 7:50:06 AM

Approved

Samuel Short
Air Permits Division
Texas Commission on Environmental Quality
512 239-5363
samuel.short@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Beryl Thatcher <Beryl.Thatcher@Tceq.Texas.Gov>
Sent: Thursday, February 25, 2021 11:11 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; Melissa Ruano <melissa.ruano@tceq.texas.gov>; Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>
Subject: For Review and Approval by 02/26/2021: DERC Intent to Use 415883

Please find the attached documents for DERC Intent to Use project 415883.

From: [Melissa Ruano](#)
To: [PSSMGR](#)
Cc: [Gabriel Garcia](#)
Subject: For Review and Approval by 02/26/2021: DERC Intent to Use 415883
Date: Tuesday, February 23, 2021 7:49:33 PM
Attachments: [415883 DCAL.docx](#)
[415883 DCTR_KM.docx](#)
[415883 DERC Intent Files.pdf](#)
[415883 EBT Route Slip.docx](#)

Please find the attached documents for DERC Intent to Use project 415883. Thanks!

Melissa Ruano

Emissions Banking and Trading Program Team Leader
Texas Commission on Environmental Quality
Air Permits Division

Email: Melissa.Ruano@tceq.texas.gov

How is our customer service? Fill out our customer satisfaction survey at
www.tceq.texas.gov/goto/customersurvey

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

From: Kelly Mackenzie <Kelly.Mackenzie@tceq.texas.gov>
Sent: Tuesday, February 23, 2021 12:45 PM
To: Melissa Ruano <melissa.ruano@tceq.texas.gov>
Subject: FW: For Review and Approval by 02/26/2021: DERC Intent to Use 415883

Hi Melissa,

Please find attached project 415883 for your review and approval. I have signed the route slip.

Thanks

Kelly

From: Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>
Sent: Tuesday, February 23, 2021 11:21 AM
To: Kelly Mackenzie <Kelly.Mackenzie@tceq.texas.gov>
Subject: RE: For Review and Approval by 02/26/2021: DERC Intent to Use 415883

Hello Kelly:
The revised documents for 415883 are attached.

Thank you,
Gabriel

From: Kelly Mackenzie <Kelly.Mackenzie@tceq.texas.gov>

Sent: Tuesday, February 23, 2021 7:55 AM

To: Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>

Subject: RE: For Review and Approval by 02/26/2021: DERC Intent to Use 415883

Hi Gabe,

Please make the edit to the technical review and update the project file so that you only have the first page of the Central Registry records included.

Once you have done this, please send the documents back to me for review and approval.

Thanks

Kelly

From: Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>

Sent: Monday, February 22, 2021 11:37 AM

To: Melissa Ruano <melissa.ruano@tceq.texas.gov>; Kelly Mackenzie
<Kelly.Mackenzie@tceq.texas.gov>

Subject: For Review and Approval by 02/26/2021: DERC Intent to Use 415883

Importance: High

Hello Melissa and Kelly:

Attached are the files for DERC Intent to Use project 415883 for Air Products LLC La Porte Plant. The company is requesting to setting aside 22.7 tons of DERCs from certificates D3489 and D3475 for compliance with 30 Texas Administrative Code (TAC) §117.320(c)(2).

Thank you,

Gabriel Garcia

Emission Banking and Trading Program

Air Quality Division

Gabriel.Garcia@tceq.texas.gov

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

APD Emissions Banking and Trading Correspondence Route Slip

Decision Due Date: February 26, 2021

Project Type: DERC Intent to Use

Project No: 415883

	Initials	Date	Comments
Gabriel Garcia, Project Manager	GG	02/22/2021	
Kelly MacKenzie, Work Leader	KM	02/23/2021	
Melissa Ruano, Team Leader	MR	2/23/2021	
Daniel Menendez, Section Manager	DM	2/24/21	
Beryl Thatcher, Assistant Director			
Sam Short, Division Director			
Mailout Information			