

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

March 30, 2021

Jeremy Keller
Plant Manager
Oxy Vinyls LP
PO Box 500
Deer Park, Texas 77536-0500
Via email

Subject: MECT Annual Compliance Report
Oxy Vinyls LP
Battleground Chlor-Alkali Plant
Customer Number: CN600129126
Regulated Entity Number: RN100217363
EBT Portfolio Number: P0509
Project Number: 415995

Dear Jeremy Keller:

The Texas Commission on Environmental Quality (TCEQ) has processed the 2020 MECT Annual Compliance Report submitted on March 19, 2021 for compliance with 30 Texas Administrative Code (TAC) §101.359. This processing does not constitute an approval of the emissions quantification methods or results submitted in the site's Annual Compliance Report. A summary of the site's compliance account (portfolio) for the control period is attached.

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 line extending to the right.

Samuel Short, Deputy Director
Air Permits Division

cc: Todd Behne, Plant Manager, Oxy Vinyls LP
Joe Nixon, Environmental Engineer, Oxy Vinyls LP
Latrice Babin, Director, Harris County Pollution Control Services Department

Table 1. Compliance Account Summary.

2020 Control Period	Amount (tons)
Certified Allocation	322.0
Previous Year Deficit with 10% Penalty	0.0
Total Current Allowances Traded In	0.0
Total Current Allowances Traded Out	0.0
Vintage Allowances from Previous Year	140.5
Vintage Allowances Traded In	0.0
Vintage Allowances Traded Out	0.0
Total Reported Emissions	210.0
Quantification Penalty	0.0
Current Allowances Used for Compliance	210.0
Vintage Allowances Used for Compliance	0.0
Deficit	0.0
Vintage Allowances Expired	140.5
Current Allowances Remaining	112.0

2020 MECT Annual Compliance Report Technical Review

Project Number:	415995	Project Manager:	Gabriel Garcia
Customer Reference No.:	CN600129126	Company Name:	Oxy Vinyls LP
Regulated Entity Reference No.:	RN100217363	Site Name:	Battleground Chlor-Alkali Plant
Portfolio Number:	P0509	County:	Harris

Summary

Review Level:	<input type="checkbox"/> Basic <input checked="" type="checkbox"/> Audit
Source Type:	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Electric Generation Utility
Quantification Penalty:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Potential Deviation:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

General Review

Review	Yes/No	Explanation
Was the report submitted on or before March 31, 2021?	Yes	Date Submitted: 03/19/2021
Was the report certified (submitted) by the portfolio's registered Primary or Alternate Authorized Account Representative (AAR)?	Yes	Certified by: Jeremy Keller
Are the company and site information consistent with Central Registry?	Yes	
Were any new FINs reported or did any existing FINs undergo a change in status (e.g., shutdown, removed, etc.)?	No	
Did the site's account for this control period have sufficient allowances to cover the emissions and any penalties assessed?	Yes	

Audit Emissions Review

Review	Yes/No	Explanation
Were appropriate protocol citations provided for the Level of Activity (LOA) and Emission Factor (EF) for each FIN?	Yes	
For units without CEMS/PEMS, were the LOA and EF for each FIN reported in the units of the applicable Chapter 117 emission specifications?	N/A	All units are equipped with PEMS.

Review	Yes/No	Explanation
Was the appropriate supporting documentation provided for each FIN? See the MECT Supporting Documentation Guidance.	Yes	
Have all relevant stack tests been reviewed to determine if the results are acceptable under 101.354(a)? Is the EF in the stack test the same value reported for this control period?	N/A	All units are equipped with PEMS
Were the emission quantification calculations correct? See Annual Reports SOP for instructions on reviewing a representative sample for each FIN type.	Yes	
Were emissions from one or more FINs determined using alternate data under §101.354(b)?	No	

ida prod

03/30/2021 ----- EBTP IMS- PROJECT RECORD -----

- Logout
- IDA Home
- Banking Home
- Add New Project
- Project
- Project Detail
- Project Report
- XactionInfo
- TrackingElement
- AssignStaff
- ProjectNote
- Port Summary
- Pseudo Summary
- Contacts
- Xactions List
- Portfolio
- Certificate
- Fin
- HECT Site Allocation
- Company
- Site
- NSR Home
- My Account

PROJECT#: 415995 STATUS: C DISP CODE: _____
 RECEIVED: 03/19/2021 PROJTYPE: BRPT ISSUED DT: 03/30/2021
 SUP-DISP DATE: 03/30/2021

STAFF ASSIGNED TO PROJECT:
 GARCIA, GABRIEL

PROJECT NOTES:
[.Attachments](#) from Steers
[.Copy Of Record](#) from Steers
 .AUDIT REVIEW

PROJECT TRANSACTIONS

COMPANY DATA
 COMPANY NAME: OXY VINYLs LP
 CUSTOMER REGISTRY ID: CN600129126

PORTFOLIO DATA
 NUMBER: P0509 NAME: BATTLEGROUND SITE - RN100217363

SITE DATA
 ACCOUNT: HG0194W
 REG ENTITY ID: RN100217363
 SITE NAME: BATTLEGROUND CHLOR-ALKALI PLANT
 COUNTY: HARRIS NEAREST CITY: LA PORTE
 LOCATION: FROM 225 EAST, TAKE EXIT FOR
 BATTLEGROUND RD AND TURN LEFT. VEER RIGHT AT
 FORK; PLANT IS ON THE RIGHT HAND SIDE.

CONTACT DATA
 NAME: JEREMY M KELLER TITLE: PLANT MANAGER
 ROLE: AAR
 STREET: PO BOX 500
 CITY/STATE, ZIP: DEER PARK, TX , 77536-0500
 PHONE: 281-476-2941 -
 EMAIL: JEREMY_KELLER@OXY.COM

NAME: TODD BEHNE TITLE: PLANT MANAGER
 ROLE: AAAR
 STREET:
 CITY/STATE, ZIP:
 PHONE: 281-476-8007 -
 EMAIL: TODD_BEHNE@OXY.COM

NAME: JOE NIXON TITLE: ENVIRONMENTAL ENGINEER
 ROLE: TECHNICAL
 STREET:
 CITY/STATE, ZIP:
 PHONE: 281-476-2847 -
 EMAIL: JOSEPH_NIXON@OXY.COM

TRANSACTION DATA
 TRANSACTION TYPE: CAP_RPT POLLUTANT : NOX
 EFFECTIVE YEAR: 2020 TON: 93.3

Allowance Type	Total
ACTUAL	210

TRANSACTION TYPE:CAP_VINT
EFFECTIVE YEAR: 2020

POLLUTANT : NOX
TON: 112.00

TRACKING ACTIVITES

PROJECT SUBMITTED : 03/19/2021 PM RECEIVED DATE : 03/19/2021
SECTION MANAGER REVIEW : 03/29/2021 03/29/2021
PROJECT COMPLETED : 03/30/2021 AUDIT REPORT : 03/31/2021

Logged In As: GAGARCIA

Date: 03/30/21

ida prod

Logout

IDA Home

Banking Home

Add New Project

Project

Portfolio

Portfolio Search

Portfolio Summary

List of Fins

List of RNs

Xactions List

Pseudo Summary

Contacts

Add Contacts

Search Contacts

Add New Portfolio

Certificate

Fin

HECT Site Allocation

Company

Site

NSR Home

My Account

Portfolio Detail

Portfolio Number: P0509
 Portfolio Name: BATTLEGROUND SITE - RN100217363
 Company Name: OXY VINYL LP

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	322	322	322	322	322	322	322
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	0	0	0	0	0	0	0
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	-181.3	-181.5	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	-181.3	-181.5	-0	-0	-0	-0	-0
Vintage From Previous Year	113.9	140.7	140.5	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	140.7	140.5	322	322	322	322	322
VINTAGE ALLOWANCE BALANCE	113.9	140.7	140.5	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

** 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

Logged In As: GAGARCIA

Date: 03/23/21

ida prod

- Logout
- IDA Home
- Banking Home
- Add New Project
- Project
- Portfolio
- Portfolio Search
- PortfolioSummary
- List of Fins
- List of RNs
- Xactions List
- PseudoSummary
- Contacts
- Add Contacts
- Search Contacts
- Add New Portfolio
- Certificate
- Fin
- HECT Site Allocation
- Company
- Site
- NSR Home
- My Account

Actual Allowances for NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Current Balance	140.70	140.50	112.00	322.00	322.00	322.00	322.00

Vintage Balances for NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Current Balance	113.90	140.70	140.50	112.00	0	0	0

Flex permits Allowances for NOX

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Current Balance	0	0	0	0	0	0	0

Pending Projects

Proj_num Xaction Type

Pseudocally Closed Projects

Proj_num Xaction Type

415995	CAP_VINT
415995	CAP_RPT

Confirm Records to Send to TCEQ

Portfolio Number:P0509


Data current as of:03/19/2021

Portfolio Information

Portfolio Number: P0509
 Portfolio Name: BATTLEGROUND SITE - RN100217363
 Program: MECT
 Project Number: 415995
 Pollutant Code: NOX
 Control Period: 2020

FIN:BGU-026	Fin Name:GAS TURBINE/HRSG #1-1300			EPN:BGU-026	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
7941410.000000	117.340(a)(1)(B)	MMBTU	117.340(c).(g)		93.22
FIN:BGU-029	Fin Name:GAS TURBINE/HRSG #2-1301			EPN:BGU-029	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
8062266.000000	117.340(a)(1)(B)	MMBTU	117.340(c).(g)		92.85
FIN:BGU-030	Fin Name:GAS TURBINE/HRSG #3-1302			EPN:(ONLINE 2005) BGU-030	CEMS/PEMS:Yes
LOA	LOA Citation	LOA Units	EF Citation	EF Units	Tons Reported
4378541.000000	117.340(a)(1)(B)	MMBTU	117.340(c).(g)		23.89
					Total Tons 210

Contact Information

Primary Contact Name: JEREMY M KELLER 
 Address: PO BOX 500 DEER PARK, TX 77536 -0500
 Phone: 281-476-2941
 Email: JEREMY_KELLER@OXY.COM
 Technical Contact Name: JOE NIXON
 Phone: 281-476-2847
 Email: JOSEPH_NIXON@OXY.COM

I certify that I have not violated any term in my TCEQ STEERS participation agreement and have no reason to believe that the confidentiality or use of my password has been compromised at any time. I understand that entering my password and pressing the "Confirm Submit" button constitutes an electronic signature legally equivalent to my written signature.

I certify that I am authorized to make this submission on behalf of the owners and operators of the site and facilities included in this submission. I certify that I have knowledge of the information in this submission and any attachments, and that, based on my knowledge and belief formed after reasonable inquiry, the information is true, accurate, and complete. I acknowledge that I have read and understand Texas Water Code (TWC) §§7.177-7.183, which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §7.187, pertaining to criminal penalties. Additionally, I understand that TWC §5.102 and Texas Health and Safety Code §382.002 authorize the TCEQ to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated.

This document was signed by Joseph Nixon.

Signature Hash: 498455F7EAA315714D4BFCA640B7585287DF104FE38D13B4C2CA540FE9B3F798

The following is additional information contained in your Copy of Record:

Submission IP address: 199.248.165.3
 Submission date and time: 03/19/2021
 Submission STEERS Version: 6.40

Regulated Entity Detail				
Regulated Entity Name:	BATTLEGROUND CHLOR-ALKALI PLANT		RN:	RN100217363
Status:	Active	Status Comment:		Stand Alone: N
Physical Address:	No physical or street address on file.		County:	HARRIS
Physical Location:	BATTLEGROUND RD AND PARK RD 1836 LA PORTE TX			
Nearest City:	LA PORTE	State:	TX	Zip Code: 77571
Latitude:		Longitude:		

1-2 of 2 Records

Affiliated Customers						List All
CN Number	Customer*	Role	Begin Date	End Date	RE Comp Hist	
CN600125256	OCCIDENTAL CHEMICAL CORPORATION	OWNER	01/1/1800	12/31/3000	UNCLASSIFIED	
CN600129126	OXY VINYLS LP	OWNER OPERATOR, RESPONSIBLE PARTY	01/1/1800	12/31/3000	SATISFACTORY	

Page 1 2 3 > 1-50 of 110 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	HG0194W	ACTIVE					View
AIR NEW SOURCE PERMITS	SITE	EPA PERMIT	PSDIX276M1	ACTIVE	OXY VINYLS BATTLEGROUND SITE	OWNER OPERATOR	Oxy Vinyls, LP (CN600129126)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	EPA PERMIT	PSDIX276M2	ACTIVE	OXY VINYLS BATTLEGROUND SITE	OWNER OPERATOR	Oxy Vinyls, LP (CN600129126)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	84936	ACTIVE	OXY VINYLS-BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	76346	ACTIVE	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	76346	ACTIVE	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	Oxy Vinyls, LP (CN600129126)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	76347	CANCELLED	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	76347	CANCELLED	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	Oxy Vinyls, LP (CN600129126)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	45163	CANCELLED	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View
AIR NEW SOURCE PERMITS	SITE	REGISTRATION	45163	CANCELLED	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	Oxy Vinyls, LP (CN600129126)	01/01/1800 - 12/31/3000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	1911I	CANCELLED	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	1911H	CANCELLED	HOUSTON OPERATIONS-BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View
AIR NEW SOURCE PERMITS	SITE	PERMIT	7647B	ACTIVE	OXY VINYLS BATTLEGROUND SITE	OWNER OPERATOR	OCCIDENTAL CHEMICAL CORPORATION (CN600125256)	01/01/1800 - 05/22/2000	View

**Texas Commission on Environmental Quality
Emissions Banking and Trading Programs
Mass Emissions Cap and Trade (MECT) Program
Supporting Documentation for CEMS and PEMS**

General Information

EBT Portfolio Number: P0509
Company Name: OXY VINYLs LP
Site Name: BATTLEGROUND CHLOR-ALKALI PLANT
Customer Reference Number: CN 600129126
Regulated Entity Reference Number: RN 100217363
MECT Control Period: January 1, 2020 - December 31, 2020


Verification of Continuous Emissions Monitoring Systems (CEMS) or Predictive Emissions Monitoring Systems (PEMS) Data Used for MECT Program Compliance

Check the boxes to certify that each statement below is true.

<input checked="" type="checkbox"/> For this control period, each CEMS or PEMS used to determine MECT emissions for the site is in compliance with the certification and quality assurance requirements in 30 TAC §117.8100 or §117.8110, as applicable. When applicable, appropriate substitute emission compliance data was used for all periods when the NO _x monitor was off-line.
<input type="checkbox"/> Information is provided in attached Table 1 for each CEMS or PEMS with downtime that exceeded 5% of the total annual operating hours of the unit during this control period. Additional information is attached to this form to explain the excessive downtime and validate the reported emissions for each CEMS or PEMS that exceeded 5% downtime.

Authorized Account Representative Signature

I certify that I am authorized to make this submission on behalf of the owners and operators of the site and facilities included in this submission. I certify that I have knowledge of the information in this submission and any attachments, and that, based on my knowledge and belief formed after reasonable inquiry, the information is true, accurate, and complete. I acknowledge that I have read and understand [Texas Water Code \(TWC\) §§7.177-7.183](#), which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and [TWC §7.187](#), pertaining to criminal penalties. Additionally, I understand that [TWC §5.102](#) and [Texas Health and Safety Code §382.002](#) authorize the TCEQ to carry out and enforce its rules and associated duties, including the duty to take enforcement actions if these rules are violated. I consent to the release of my contact information, including email address, in connection with information regarding this account under the Public Information Act.

Signature: 	Date: 3/19/2021
Name: Jeremy M. Keller	
Title: Plant Manager	
Telephone: 281-476-2941	
Email: Jeremy_Keller@oxy.com	

Print

Reset

2020 MECT Annual Compliance Report
Supporting Documentation

	Fired Duty (MMBTU)	NOx (tons)	Fired Duty (MMBTU)	NOx (tons)	Fired Duty (MMBTU)	NOx (tons)
Month	BGU-026	BGU-026	BGU-029	BGU-029	BGU-030	BGU-030
Jan	445,958	5.34	663,103	8.16	697,538	4.25
Feb	749,223	10.47	774,949	10.13	0	0.00
Mar	791,010	10.30	815,157	10.00	0	0.00
Apr	685,196	8.15	640,273	6.20	0	0.00
May	755,557	9.25	800,993	9.14	815	0.00
Jun	624,057	8.06	745,143	9.23	296,789	1.63
Jul	636,110	6.67	572,396	6.08	583,415	3.42
Aug	630,744	6.27	652,180	6.60	509,801	3.08
Sep	611,479	6.71	586,171	6.33	592,545	3.10
Oct	797,596	9.84	460,066	5.86	488,328	2.70
Nov	521,476	5.13	677,326	7.34	652,258	2.94
Dec	677,299	7.04	674,508	7.77	557,052	2.75
	7,941,410	93.22	8,062,266	92.85	4,378,541	23.89

From: [APDDIR](#)
To: [Beryl Thatcher](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Gabriel Garcia](#)
Subject: RE: For Review and Approval by 03/31/2021: MECT Annual Report 415995
Date: Tuesday, March 30, 2021 1:32:45 PM

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/customerurvey

From: Beryl Thatcher <Beryl.Thatcher@Tceq.Texas.Gov>
Sent: Tuesday, March 30, 2021 9:20 AM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>
Subject: For Review and Approval by 03/31/2021: MECT Annual Report 415995

Please find the attached documents for MECT Audit report 415995.

From: [EBTTL](#)
To: [Gabriel Garcia](#)
Subject: FW: For Review and Approval by 03/31/2021: MECT Annual Report 415995
Date: Monday, March 29, 2021 9:11:26 AM
Attachments: [415995 Annual Report Letter.docx](#)
[415995 EBT Route Slip.docx](#)
[415995 MECT audit files.pdf](#)
[415995 Technical Review.docx](#)

Gabe,

On your technical review, I added "All units are equipped with PEMS" to explain the N/A. Let me know if you have any questions.

Melissa

From: EBTTL
Sent: Monday, March 29, 2021 9:10 AM
To: PSSMGR <PSSMGR@tceq.texas.gov>
Cc: Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>
Subject: For Review and Approval by 03/31/2021: MECT Annual Report 415995

Please find the attached documents for MECT Audit report 415995. Let us know if you have any questions.

Thanks,
Melissa

From: Gabriel Garcia <Gabriel.Garcia@tceq.texas.gov>
Sent: Wednesday, March 24, 2021 12:39 PM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For Review and Approval by 03/30/2021: MECT Annual Report 415995

Hello Melissa:

Attached are the files for MECT audit annual report 415995 for Battleground Chlor-Alkali Plant. The company is reporting 210 tons of NOX emissions. All of the FINs are equipped with CEMS and the necessary supporting documents are in the project files.

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: March 31, 2021

Project Type: MECT audit annual report

Project No: 415995

	Initials	Date	Comments
<i>Gabriel Garcia,</i> Project Manager	GG	03/24/2021	
Melissa Ruano, Team Leader	MR	3/29/2021	
Daniel Menendez, Section Manager	DM	3/29/31	
Beryl Thatcher, Assistant Director			
Sam Short, Division Director			
Mailout Information			