

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



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 24, 2022

HARI SUNDARAM  
PLANT MANAGER  
AFTON CHEMICAL CORPORATION  
1000 NORTH SOUTH STREET  
PASADENA, TEXAS 77503  
Via email

Subject: Notice of Intent to Use Discrete Emission Credits  
Afton Chemical Corporation  
Afton Lube and Fuel Additives Plant  
Customer Number: CN604980136  
Regulated Entity Number: RN101613230  
EBT Portfolio Number: P3760  
Project Number: 416819

Dear Hari Sundaram:

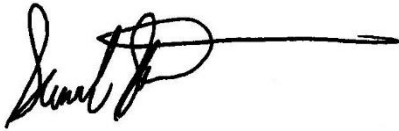
In response to your Notice of Intent to Use Discrete Emission Credits submitted on January 27, 2022, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for compliance with 30 Texas Administrative Code (TAC) §117.2010(c)(1)(A). A Notice of Use of Discrete Emission Credits 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 TAC Chapter 101, Subchapter H, Division 4.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Retained Certificate	Amount Retained (tons)
NO <sub>x</sub>	3/16/2022 - 3/15/2023	D3521	0.3	D3582	1.2

Hari Sundaram  
Page 2  
February 24, 2022

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](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 Joseph Musa at [joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov), or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

cc: Mario Troncoso, EHS Specialist, Afton Chemical Corporation  
Maryam Shekari, EHS Manager, Afton Chemical Corporation  
Director, Harris County, Pollution Control Services, Pasadena  
Chief Health Inspector, Health Department, City of Pasadena, Pasadena

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

Project Number:	416819	Project Manager:	Joseph Musa
Customer Reference No.:	CN604980136	Company Name:	Afton Chemical Corporation
Regulated Entity Reference No.:	RN101613230	Site Name:	Afton Lube and Fuel Additives Plant
Portfolio Number:	P3760	County:	Harris

### Project Overview

Review	Explanation
Application Submitted Date:	1/27/2022
Intent Amount and Certificate(s):	0.3 ton from Certificate D3521
Pollutant:	NO <sub>x</sub>
Reason for Use:	Compliance with 30 TAC 117.2010(c)(1)(A)
Use period:	3/16/2022 - 3/15/2023
Retained Amount and Certificate(s):	1.2 tons in Certificate D3582
Additional Information:	The application was submitted for compliance with §117.2010(c)(1)(a). Excess emissions, if any, from a heater, FIN X-C-1, at the site will be covered by the NO <sub>x</sub> DERCs, which are set aside.

### Calculation Methodology

The heater is subject to the Emission Specifications for Attainment Demonstration (ESAD) in §117.2010(c)(1)(A). The ESAD for the unit is 0.036 pounds of NO<sub>x</sub> per million British thermal units (lb/MMBtu), while the expected emission rate is 0.044 lb/MMBtu. The expected emission rate was determined from a stack test that was conducted on the unit on August 20, 2008 (see the project file for project number 408606). Because the expected emission rate exceeds the ESAD value, the company intends to use DERCs to cover potential excess emissions.

Based on the 2021 fuel usage, the company expects the heater to use 32,383 Mscf of natural gas with an average heating value of 1,020 Btu/scf. Thus, the expected level of activity would be 33,031 MMBtu.

Per §101.376(d)(2)(B), the amount of discrete emission credits (DECs) needed is determined by the following equation:

$$DECs = (ELA) \times (EER - RER)$$

Where:

ELA = The expected level of activity.

EER = The expected emission rate per unit activity.

RER = The regulatory emission rate per unit activity.

$$DECs\ needed = \left( 0.044 \frac{lb}{MMBtu} - 0.036 \frac{lb}{MMBtu} \right) \times (33,031\ MMBtu) \times \frac{ton}{2,000\ lb} = 0.13\ ton$$

Amount of DERCs needed is 0.13 ton, rounded up to 0.2. With the 10% environmental contribution of 0.02 ton, rounded up to 0.1 ton, the total amount needed is 0.3 ton.

**Conclusion**

The TCEQ is approving the request to set aside 0.3 ton of NO<sub>x</sub> DERCs from certificate D3521 for compliance with 30 TAC 117.2010(c)(1)(A) during the use period of 3/16/2022 - 3/15/2023. Certificate D3582 (1.2 tons NO<sub>x</sub>) will be returned to the company for future use.

**02/24/2022 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 416819      STATUS: C      DISP CODE: \_\_\_\_\_  
RECEIVED: 01/31/2022      PROJTYPE: BDIU      ISSUED DT: \_\_\_\_\_  
SUP-DISP DATE: 02/24/2022

**STAFF ASSIGNED TO PROJECT:**

MUSA, JOSEPH

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**PROJECT NOTES:**

.USE PERIOD: 3/16/2022 THROUGH 3/15/2023.

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**PROJECT TRANSACTIONS**

**COMPANY DATA**

COMPANY NAME: AFTON CHEMICAL CORPORATION  
CUSTOMER REGISTRY ID: CN604980136

**PORTFOLIO DATA**

NUMBER: P3760 NAME: AFTON CHEM CORPLUBE AND FUEL ADD PLANT-RN101613230

**SITE DATA**

ACCOUNT: HG6831P  
REG ENTITY ID: RN101613230  
SITE NAME: AFTON LUBE AND FUEL ADDITIVES PLANT  
COUNTY: HARRIS      NEAREST CITY: PASADENA  
LOCATION: APPROX 1.5 MI N OF SH 225 & PRESTON ST

**CONTACT DATA**

NAME: MARYAM SHEKARI      TITLE: EHS MANAGER  
ROLE: TECHNICAL  
STREET:  
CITY/STATE, ZIP:  
PHONE: 713-740-8340 -  
EMAIL: MARYAM.SHEKARI@AFTONCHEMICAL.COM

NAME: HARI SUNDARAM      TITLE: PLANT MANAGER  
ROLE: AAR  
STREET: 1000 N South St  
CITY/STATE, ZIP: PASADENA, TX , 77503-  
PHONE: 713-740-8418 -  
EMAIL: HARI.SUNDARAM@AFTONCHEMICAL.COM

NAME: MARIO TRONCOSO      TITLE: EHS SPECIALIST  
ROLE: TECHNICAL  
STREET:  
CITY/STATE, ZIP:  
PHONE: 713-740-8428 -  
EMAIL:  
MARIO.TRONCOSO@AFTONCHEMICAL.COM

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_INTEN  
DATE ENTERED: 2022-02-02 00:00:00.0      DELETED DATE:      EFFECTIVE YEAR:  
CONTAMINATE: NOX      TONS: 0.30      DOLLARS: 0  
ALLOWANCE0      CERTIFICATE NO.: D3521      COUNTY : HARRIS

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2022-02-02 00:00:00.0

CONTAMINATE: **NOX**ALLOWANCE**0**

DELETED DATE:

EFFECTIVE YEAR:

TONS: **1.20**DOLLARS: **0**CERTIFICATE NO.: **D3582** COUNTY : **HARRIS****TRACKING ACTIVITES**PROJECT SUBMITTED : 01/27/2022 PROJECT RECEIVED BY  
PM : 02/03/2022

TR - DEFICIENCY CYCLE : 02/07/2022 02/11/2022

TEAM LEAD REVIEW : 02/18/2022 SECTION MANAGER  
REVIEW : 02/22/2022

**Portfolio Detail**

**Portfolio Number:** P3760  
**Portfolio Name:** AFTON CHEM CORPLUBE AND FUEL ADD PLANT-RN101613230  
**Company Name:** AFTON CHEMICAL CORPORATION

**Actual Allowances for Pollutant NOX**

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Penalty from last year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Certified Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances for Offsets	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Future Trade In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Future Trade Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	0	0	0	0	0	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage From Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Vintage Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Vintage Used for Compliance	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
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	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
VINTAGE ALLOWANCE BALANCE	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

**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

**SD / Allowances for Pollutant NOX**

Balance/Year	2018	2019	2020	2021	2022	2023	2024
Previous Year Deficit	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allowances Remaining from Previous Year	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Allocation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Current Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Stream Traded In	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Stream Traded Out	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
Total Reported Emissions	-0	-0	-0	-0	-0	-0	-0
Remaining Balance	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

**DERC >**

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
<a href="#">D3228</a>	NOX	0.30	DERC_BUY	07/17/2017	11/01/1997	10/31/1998	HARRIS	D3165
<a href="#">D3295</a>	NOX	0.40	DERC_INTEN	07/18/2019	08/01/1995	12/31/1997	BRAZORIA	D3273
<a href="#">D3381</a>	NOX	0.30	DERC_USE	10/11/2018	08/01/1995	12/31/1997	BRAZORIA	D3273
<a href="#">D3401</a>	NOX	2.00	DERC_INTEN	08/05/2021	11/01/1997	10/31/1998	HARRIS	D3274
<a href="#">D3487</a>	NOX	0.30	DERC_USE	09/09/2020	11/01/1997	10/31/1998	HARRIS	D3274
<a href="#">D3582</a>	NOX	1.20	DERC_RET	12/30/3000	11/01/1997	10/31/1998	HARRIS	D3521
<a href="#">D3274</a>	NOX	2.30	DERC_INTEN	09/09/2020	11/01/1997	10/31/1998	HARRIS	D2925
<a href="#">D3401</a>	NOX	2.00	DERC_RET	08/05/2021	11/01/1997	10/31/1998	HARRIS	D3274
<a href="#">D3351</a>	NOX	0.10	DERC_RET	12/30/3000	08/01/1995	12/31/1997	BRAZORIA	D3295
<a href="#">D3228</a>	NOX	0.30	DERC_USE	07/17/2017	11/01/1997	10/31/1998	HARRIS	D3165
<a href="#">D3273</a>	NOX	0.70	DERC_INTEN	10/11/2018	08/01/1995	12/31/1997	BRAZORIA	D2541
<a href="#">D3274</a>	NOX	2.30	DERC_BUY	09/09/2020	11/01/1997	10/31/1998	HARRIS	D2925
<a href="#">D3521</a>	NOX	1.50	DERC_INTEN	12/30/3000	11/01/1997	10/31/1998	HARRIS	D3474
<a href="#">D3228</a>	NOX	0.30	DERC_INTEN	07/17/2017	11/01/1997	10/31/1998	HARRIS	D3165
<a href="#">D3273</a>	NOX	0.70	DERC_BUY	10/11/2018	08/01/1995	12/31/1997	BRAZORIA	D2541
<a href="#">D3474</a>	NOX	1.70	DERC_INTEN	12/30/3000	11/01/1997	10/31/1998	HARRIS	D3401
<a href="#">D3474</a>	NOX	1.70	DERC_RET	12/30/3000	11/01/1997	10/31/1998	HARRIS	D3401
<a href="#">D3295</a>	NOX	0.40	DERC_RET	07/18/2019	08/01/1995	12/31/1997	BRAZORIA	D3273
<a href="#">D3351</a>	NOX	0.10	DERC_INTEN	12/30/3000	08/01/1995	12/31/1997	BRAZORIA	D3295
<a href="#">D3427</a>	NOX	0.30	DERC_USE	07/18/2019	08/01/1995	12/31/1997	BRAZORIA	D3295
<a href="#">D3521</a>	NOX	1.50	DERC_RET	12/30/3000	11/01/1997	10/31/1998	HARRIS	D3474
<a href="#">D3555</a>	NOX	0.30	DERC_USE	08/05/2021	11/01/1997	10/31/1998	HARRIS	D3401





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

<b>I. Company Identifying Information</b>			
A. Company Name: <b>Afton Chemical Corporation</b>			
Mailing Address: <b>1000 N South Street</b>			
City: <b>Pasadena</b>	State: <b>TX</b>	Zip Code: <b>77503</b>	
Telephone: <b>(713) 740-8300</b>		Fax: <b>(713) 740-8310</b>	
B. TCEQ Customer Number (CN): <b>CN604980136</b>			
C. Site Name: <b>Afton Chemical Corporation - Lube and Fuel Additives Plant</b>			
Street Address (If no street address, give driving directions to site) <b>1000 N South Street</b>			
Nearest City: <b>Pasadena</b>	Zip Code: <b>77503-2516</b>	County: <b>Harris</b>	
D. TCEQ Regulated Entity Number (RN): <b>RN101613230</b>			
E. TCEQ Air Account Number: (if applicable) <b>HG-6831-P</b>			
F. Primary SIC: <b>2869</b>		Air Permit Number: <b>18161</b>	
<b>II. Technical Contact Identifying Information</b>			
A. Technical Contact Name: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : <b>Mario Troncoso</b>			
Technical Contact Title: <b>EHS Specialist</b>			
Mailing Address: <b>1000 N South Street</b>			
City: <b>Pasadena</b>	State: <b>TX</b>	Zip Code: <b>77503</b>	
Telephone: <b>(713) 740-8428</b>	Fax:	E-mail: <b>Mario.Troncoso@AftonChemical.com</b>	
<b>III. Company Contact Identifying Information (If different from Technical Contact)</b>			
A. Company Contact Name: ( <input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) : <b>Maryam Shekari</b>			
Company Contact Title: <b>EHS Manager</b>			
Mailing Address: <b>1000 N South Street</b>			
City: <b>Pasadena</b>	State: <b>TX</b>	Zip Code: <b>77503</b>	
Telephone: <b>(713) 740-8340</b>	Fax:	E-mail: <b>Maryam.Shekari@AftonChemical.com</b>	
<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 _____			
Note: If DERC use is to comply with MECT then go to Section IX			
<b>V. Intended Use Period</b>			
Intended Use Start Date: <b>03/16/2022</b>		Intended Use End Date: <b>03/15/2023</b>	



**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 117.2010(c)(1)(A); 30 TAC 117.9800(a)(6); 30 TAC 117.9200(2)(D)**

**VII. Most Stringent Emission Rate**

Describe basis for most stringent allowable emission rate:

☐ Permit: \_\_\_\_\_ ☐ RACT: \_\_\_\_\_ ☒ Other: **§117.2010(c)(1)(A)**

*Notes:*

**Regulatory NO<sub>x</sub> emission limit (0.036 lb/MMBtu) for gas-fired heaters located in an ozone non-attainment area at a minor NO<sub>x</sub> source.**

**VIII. Protocol**

Protocol used to calculate DERC:

**Emissions calculations are attached at the end of this package.**

Note: Attach the actual calculations that were used to determine the amounts of DERCs needed to this form

Continue to Section IX (next page)



Form DEC-2 (Page 3)  
 Notice of Intent to Use Discrete Emission Credits  
 (Title 30 Texas Administrative Code § 101.370 - § 101.379)

IX. Tons of DERCS Required									
Emission Point No.	FIN	Air Contaminant	Calculation of DERCS						
			Expected Activity (units)	Expected Emission Rate (units)	Expected Total Emissions (tons)	Regulated Activity (units)	Regulated Emission Rate (units)	Regulated Total Emissions (tons)	DERCs (tons)
X-C-1	X-C-1	NOx	33,031 (MMBtu)	0.044 (lb/MMBtu)	0.727 (tons)	33,031 (MMBtu)	0.036 (lb/MMBtu)	0.595 (tons)	0.132 (tons)
								<b>Total:</b>	<b>0.132 (tons)</b>



**Form DEC-2 (Page 1)**  
**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 <sub>x</sub> : <u>0.2</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : <u>0.1</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Compliance Margin (+ 5%) (If DERC use requires > 10 tons)	CO: _____	NO <sub>x</sub> : _____	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
<b>Total DERCs</b>	<b>CO: _____</b>	<b>NO<sub>x</sub>: <u>0.3</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: KM Liquids Terminals LLC  
DERC Generator Regulated Entity Number: RN100237452  
Certificate number of the DERCs acquired or to be acquired: D-3521  
Date on which the DERCs were acquired or will be acquired: 12/21/2016  
*Note: The certificate number is assigned by the TCEQ*

**XII. Certification by Responsible Official**

I, Hari Sundaram, 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:  Signature Date 1/26/2022  
Title Plant Manager

## Central Registry Query - Regulated Entity Information

### Regulated Entity Information

**RN Number:** RN101613230

**Name:** AFTON LUBE AND FUEL ADDITIVES PLANT [View Prior Names ...](#)

**Primary Business:** PRODUCER OF FUEL AND LUBE OIL ADDITIVES

**Street Address:** 1000 N SOUTH ST, PASADENA TX 77503 2516

**County:** HARRIS

**Nearest City:** PASADENA

**State:** TX

**Near ZIP Code:** 77503


**Physical Location:** No physical location description ON file.

### Affiliated Customers - Current

Your Search Returned **3** Current Affiliation Records ( [View Affiliation History ...](#) )

*The Customer Name displayed may be different than the Customer Name associated to the Additional IDs related to the customer. This name may be different due to ownership changes, legal name changes, or other administrative changes.*

#### 1-3 of 3 Records

CN Number ▲	Customer Name	Customer Role(s)	Details
<a href="#">CN600127740</a>	ETHYL CORPORATION	OWNER OPERATOR	
<a href="#">CN600872071</a>	AFTON CHEMICAL ADDITIVES CORPORATION	OWNER OPERATOR	
<a href="#">CN604980136</a>	AFTON CHEMICAL CORPORATION	OWNER OPERATOR	

### Industry Type Codes

Code	Classification	Name
325199	NAICS	All Other Basic Organic Chemical Manufacturing
325998	NAICS	All Other Miscellaneous Chemical Product Manufacturing
2869	SIC	Industrial Organic Chemicals
4226	SIC	Special Warehousing and Storage

### Permits, Registrations, or Other Authorizations

There are a total of **42** programs and IDs for this regulated entity. Click on a column name to change the sort order.

#### 1-42 of 42 Records

Program ▲	ID Type	ID Number	ID Status
AIR EMISSIONS INVENTORY	ACCOUNT NUMBER	<a href="#">HG6831P</a>	ACTIVE
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	<a href="#">HG6831P</a>	CANCELLED





**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Article No. 7020 0640 0001 3399 1379

January 26, 2022

Texas Commission on Environmental Quality  
Emissions Banking and Trading Program (MC 206)  
P. O. Box 13087  
Austin, TX 78711-3087

RE: **TCEQ Form DEC-2 (Use Period: 03/16/2022 – 03/15/2023)**  
Afton Chemical Corporation - Lube and Fuel Additives Plant; Pasadena, Harris County  
CN 604980136; RN101613230  
Account Number: HG-6831-P

Dear EB&T Team:

Afton Chemical Corporation (Afton) is submitting TCEQ Form DEC-2 (Notice of Intent to Use Discrete Emission Credits) pursuant to 30 TAC 101.376(d).

The attached Form DEC-2 represents the estimated (NOx) DERC use for the period of March 16, 2022 to March 15, 2023. The calculations used to develop the estimate are included.

A Form DEC-3 for the above referenced dates will be submitted following the end of the use period, as required by 30 TAC 101.376(e)(3).

If you have any questions regarding this submittal, or need additional information, please contact me (713-740-8428; [Mario.Troncoso@aftonchemical.com](mailto:Mario.Troncoso@aftonchemical.com)) or Maryam Shekari at (713-740-8340; [Maryam.Shekari@AftonChemical.com](mailto:Maryam.Shekari@AftonChemical.com)).

Sincerely,

A handwritten signature in blue ink, appearing to read "Mario Troncoso", is written over a light blue rectangular background.

Mario Troncoso  
EHS Specialist

Enclosures

**From:** [Troncoso, Mario](#)  
**To:** [Joseph Musa](#)  
**Cc:** [Sundaram, Hari](#); [Shekari, Maryam](#)  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits for Afton Lube and Fuel Additives Plant  
**Date:** Friday, February 11, 2022 9:11:32 AM

Joseph,

Below are the requested calculations;

Afton Chemical Corporation – Lube and Fuel Additives Plant				
Company Number	CN604980136	Equipment	E-1614 Syltherm Heater	
Regulated Entity Number	RN101613230	EPN	X-C-1	
TCEQ Account Number	HG-6831-P			
Estimated DERC Requirements (for DEC-2 preparation)				
Use period:	03/16/2022 to 03/15/2023			
Basis:	NG Consumption For Similar Period of Prior Year			
	Natural Gas Usage (MSCF estimate) <sup>1</sup>	MMBtu <sup>2</sup>	Emission Factor (NOx lb/MMBtu)	Tons per year
E-1614	32,383	33,031	0.044	0.727
Target			0.036	0.595
Delta <sup>3</sup>				0.132
Estimated DERCs required				0.200
Minimum Environmental Contribution				0.100
Total DERCs required for use				0.300
(1) based on 2021 usage				
(2) 1020 Btu/scf				
(3) must be covered by NOx DERCs				
				1/25/2022

tpy = (lb/MMscf / Btu/scf \* MMBtu/hr \* hr/yr \* ton/2000lb)  
tpy = 33031 MMBtu \* 0.044 Nox lb/MMBtu/2000 lb = 0.727 tpy  
tpy = 33031 MMBtu \* 0.036 Nox lb/MMBtu/2000 lb = 0.595 tpy  
tpy = (E-1614 actual - E-1614 target)  
tpy = 0.727 tpy - 0.595 tpy = 0.132  
tpy

Please feel free to reach out to me directly with any additional questions you may have.

Best Regards,

*Mario A. Troncoso, II*  
**EHS Environmental Specialist**  
Office: +1.713.740.8428  
Work: +1.281.906.6969  
Cell: +1.956.655.6565

**Afton Chemical Corporation**  
1000 N. South Street  
Pasadena, Texas 77503

**From:** Joseph Musa <joseph.musa@tceq.texas.gov>  
**Sent:** Monday, February 7, 2022 15:09  
**To:** Troncoso, Mario <Mario.Troncoso@AftonChemical.com>  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits for Afton Lube and Fuel Additives Plant

Mario:

Please email the calculations.

Joseph Musa

**From:** Troncoso, Mario <[Mario.Troncoso@AftonChemical.com](mailto:Mario.Troncoso@AftonChemical.com)>  
**Sent:** Monday, February 7, 2022 2:39 PM  
**To:** Joseph Musa <[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)>  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits for Afton Lube and Fuel Additives Plant

Hi Joseph,

Are you okay with me informally emailing you the calculations you requested?

Thanks,

*Mario A. Troncoso, II*  
**EHS Environmental Specialist**  
Office: +1.713.740.8428  
Work: +1.281.906.6969  
Cell: +1.956.655.6565

**Afton Chemical Corporation**  
1000 N. South Street  
Pasadena, Texas 77503

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**From:** Joseph Musa <[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)>  
**Sent:** Monday, February 7, 2022 14:36  
**To:** Sundaram, Hari <[Hari.Sundaram@AftonChemical.com](mailto:Hari.Sundaram@AftonChemical.com)>  
**Cc:** Shekari, Maryam <[Maryam.Shekari@AftonChemical.com](mailto:Maryam.Shekari@AftonChemical.com)>; Troncoso, Mario <[Mario.Troncoso@AftonChemical.com](mailto:Mario.Troncoso@AftonChemical.com)>  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits for Afton Lube and Fuel Additives Plant

Mr. Sundaram:

Please update your company's AAR contact information through the State of Texas Environmental Electronic Reporting System ([STEERS](#)) to ensure that it is accurate.

Joseph Musa

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**From:** Sundaram, Hari <[Hari.Sundaram@AftonChemical.com](mailto:Hari.Sundaram@AftonChemical.com)>  
**Sent:** Monday, February 7, 2022 1:51 PM  
**To:** Joseph Musa <[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)>  
**Cc:** Kolb, Scott <[Scott.Kolb@AftonChemical.com](mailto:Scott.Kolb@AftonChemical.com)>; [emem.okoye@aftonchemical.com](mailto:emem.okoye@aftonchemical.com)  
**Subject:** RE: Notice of Intent to Use Discrete Emission Credits for Afton Lube and Fuel Additives Plant

I have copied my EHS manager and Env engineer on this email. They will provide you with the info.  
Please update your records too as Scott and Emem are no longer with the company. They have been replaced with Maryam Shekari and Mario Troncoso respectively.

Thanks

**Hari Sundaram**  
Plant Manager | Afton Chemical  
1000 N. South St. | Pasadena, TX 77503  
P 713.740.8418 C 618.799.1029  
[hari.sundaram@aftonchemical.com](mailto:hari.sundaram@aftonchemical.com)

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**From:** Joseph Musa <[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)>  
**Sent:** Monday, February 7, 2022 1:47 PM  
**To:** Sundaram, Hari <[Hari.Sundaram@AftonChemical.com](mailto:Hari.Sundaram@AftonChemical.com)>  
**Cc:** Kolb, Scott <[Scott.Kolb@AftonChemical.com](mailto:Scott.Kolb@AftonChemical.com)>; [emem.okoye@aftonchemical.com](mailto:emem.okoye@aftonchemical.com)  
**Subject:** Notice of Intent to Use Discrete Emission Credits for Afton Lube and Fuel Additives Plant

----- EXTERNAL EMAIL -----  
This email originated from outside of your organization. Do not click links or open attachments unless you recognize the source of this email and know the content is safe. If unsure report it to IT ServiceDesk.

Mr. Sundaram:

This email is in response to the referenced application submitted to the Texas Commission on Environmental Quality on January 27, 2022 (EBT Project Number 416819). Please provide the information listed below by February 11, 2022.

- Calculations showing how the DERC amount of 0.13 ton was determined.



Please contact me if you have any questions.

Joseph Musa

Air Permits Division

Texas Commission on Environmental Quality

[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)

How is our customer service? <https://www.tceq.texas.gov/customersurvey>

**From:** [EBTTL](#)  
**To:** [PSSMGR](#)  
**Cc:** [Joseph Musa](#)  
**Subject:** For Review and Approval by 2/25/22: DERC Intent 416819  
**Date:** Tuesday, February 22, 2022 1:01:48 PM  
**Attachments:** [416819 DERC Intent .pdf](#)  
[416819 DCTR.docx](#)  
[416819 DCUA.docx](#)  
[416819 Route Slip.docx](#)

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Hi Daniel,

Please find the attached documents for DERC Intent to Use 416819. Thanks!

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**From:** Joseph Musa <joseph.musa@tceq.texas.gov>  
**Sent:** Friday, February 18, 2022 9:55 AM  
**To:** EBTTL <EBTTL@tceq.texas.gov>  
**Subject:** For Review and Approval by 2/23/22: DERC Intent 416819

Melissa:

Please find the attached documents for the referenced project.

Joseph Musa  
(512) 239-3328

**From:** [APDDIR](#)  
**To:** [Beryl Thatcher](#); [APDDIR](#)  
**Cc:** [PSSMGR](#); [EBTTL](#); [Joseph Musa](#)  
**Subject:** RE: For Review and Approval by 2/25/22: DERC Intent 416819  
**Date:** Thursday, February 24, 2022 8:33:25 AM

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Approved

Samuel Short  
Deputy Director, Air Permits Division  
Texas Commission on Environmental Quality  
512 239-5363  
[Samuel.short@tceq.texas.gov](mailto:Samuel.short@tceq.texas.gov)



[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Beryl Thatcher <[Beryl.Thatcher@Tceq.Texas.Gov](mailto:Beryl.Thatcher@Tceq.Texas.Gov)>  
**Sent:** Thursday, February 24, 2022 8:31 AM  
**To:** APDDIR <[APDDIR@tceq.texas.gov](mailto:APDDIR@tceq.texas.gov)>  
**Cc:** PSSMGR <[PSSMGR@tceq.texas.gov](mailto:PSSMGR@tceq.texas.gov)>; EBTTL <[EBTTL@tceq.texas.gov](mailto:EBTTL@tceq.texas.gov)>; Joseph Musa <[joseph.musa@tceq.texas.gov](mailto:joseph.musa@tceq.texas.gov)>  
**Subject:** For Review and Approval by 2/25/22: DERC Intent 416819

Please find the attached documents for DERC Intent to Use 416819.

## APD Emissions Banking and Trading Correspondence Route Slip

**Decision Due Date:** 2/25/2022

**Project Type:** DERC Intent

**Project No:** 416819

	Initials	Date	Comments
Joseph Musa, Project Manager	JM	2/18/2022	
Melissa Ruano, Team Leader	MR	2/22/2022	
Daniel Menendez, Section Manager			
Beryl Thatcher, Assistant Director			
Sam Short, Division Director			
Mailout Information			
Emailed 2/24/2022			

**From:** [Joseph Musa](#)  
**To:** [hari.sundaram@aftonchemical.com](mailto:hari.sundaram@aftonchemical.com)  
**Cc:** [maryam.shekari@aftonchemical.com](mailto:maryam.shekari@aftonchemical.com); [Troncoso, Mario](#); [kperez@pasadenatx.gov](mailto:kperez@pasadenatx.gov)  
**Subject:** TCEQ EBT Document - DERC Intent  
**Date:** Thursday, February 24, 2022 1:20:00 PM  
**Attachments:** [416819 Afton Chemical Corporation.pdf](#)

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Please see the attached EBT document for project number 416819. For additional information about this 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](mailto:ebt@tceq.texas.gov)