

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 5, 2023

NARAYAN DAVE
ENVIRONMENTAL MANAGER
MONUMENT CHEMICAL BAYPORT, LLC
16717 JACINTOPORT BOULEVARD
HOUSTON, TEXAS 77015
Via email

Subject: Notice of Intent to Use Discrete Emission Credits
Monument Chemical Bayport, LLC
Nova Molecular Technologies
Customer Number: CN605613991
Regulated Entity Number: RN100925551
EBT Portfolio Number: P3957
Project Number: 418419

Dear Narayan Dave:

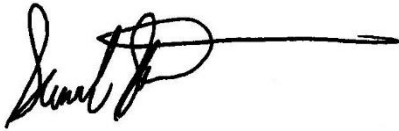
In response to your Notice of Intent to Use Discrete Emission Credits submitted on November 14, 2023, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for compliance with 30 Texas Administrative Code (TAC) §117.2010(b) and (c)(1)(A). A Notice of Use of Discrete Emission 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 _x	1/1/2024 - 12/31/2024	D3667	1.3	D3705	0.2

Narayan Dave
Page 2
December 5, 2023

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 Joseph Musa at 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: 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:	418419	Project Manager:	Joseph Musa
Customer Reference No.:	CN605613991	Company Name:	Monument Chemical Bayport, LLC
Regulated Entity Reference No.:	RN100925551	Site Name:	Nova Molecular Technologies
Portfolio Number:	P3957	County:	Harris

Project Overview

Review	Explanation
Application Submitted Date:	11/14/2023
Intent Amount and Certificate(s):	1.3 tons from certificate D3667
Pollutant:	NO _x
Reason for Use:	Compliance with 30 TAC §117.2010(b) and (c)(1)(A)
Use period:	1/1/2024 - 12/31/2024
Retained Amount and Certificate(s):	0.2 ton in certificate D3705
Additional Information:	The application was submitted for compliance with §117.2010(b) and (c)(1)(a). Excess emissions, if any, from a hot oil heater at the site will be covered by the NO _x 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 lb/MMBtu, while the expected emission rate is 0.0617 lb/MMBtu. The expected emission rate was determined from a stack test that was conducted on the unit on July 2, 2012. Because the expected emission rate exceeds the ESAD value, the company intends to use DERCs to cover potential excess emissions. The expected level of activity is 80,000 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.

$$DECs\ needed = \left(0.0617 \frac{lb}{MMBtu} - 0.036 \frac{lb}{MMBtu} \right) \times (80,000\ MMBtu) \times \frac{ton}{2,000\ lb} = 1.03\ tons$$

Amount of DERCs needed is 1.03 tons, rounded up to 1.1. With the 10% environmental contribution of 0.11 ton, rounded up to 0.2 ton, the total amount needed is 1.3 tons.

Conclusion

The TCEQ is approving the request to set aside 1.3 tons of NO_x DERCs from certificate D3667 for compliance with 30 TAC §117.2010(b) and (c)(1)(A) during the use period of 1/1/2024 - 12/31/2024. Certificate D3705 (0.2 ton NO_x) will be returned to the company for future use.

12/05/2023 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 418419 STATUS: C DISP CODE: _____
RECEIVED: 11/14/2023 PROJTYPE: BDIU ISSUED DT: _____
SUP-DISP DATE: 12/05/2023

STAFF ASSIGNED TO PROJECT:

MUSA, JOSEPH

PROJECT NOTES:

.MONUMENT CHEMICAL BAYPORT, LLC IS SUBMITTING THIS NOTICE IN ACCORDANCE WITH 30 TAC 101.376 TO COMPLY WITH THE EMISSION CONTROL REQUIREMENTS OF 30 TAC 117.2010(B) AND (C)(1)(A) AS ALLOWED BY 30 TAC 117.9800(A).

.[Attachments](#) from Steers

.[Copy Of Record](#) from Steers

.USE PERIOD: 1/1/2024 THROUGH 12/31/2024.

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: MONUMENT CHEMICAL BAYPORT LLC

CUSTOMER REGISTRY ID: CN605613991

PORTFOLIO DATA

NUMBER: P3957 NAME: NOVA MOLECULAR TECHNOLOGIES - RN100925551

SITE DATA

ACCOUNT: HG6473T

REG ENTITY ID: RN100925551

SITE NAME: NOVA MOLECULAR TECHNOLOGIES

COUNTY: HARRIS

NEAREST CITY: PASADENA

LOCATION: 10200 BAY AREA BLVD PASADENA, TX 77507-1852

CONTACT DATA

NAME: NARAYAN DAVE

TITLE: ENVIRONMENTAL MANAGER

ROLE: AAR

STREET: 16717 JACINTOPORT BLVD

CITY/STATE, ZIP: HOUSTON, TX , 77015-

PHONE: 281-507-3223 -

EMAIL: NDAVE@MONUMENTCHEMICAL.COM

NAME: NARAYAN DAVE

TITLE: ENVIRONMENTAL MANAGER

ROLE: TECHNICAL

STREET:

CITY/STATE, ZIP:

PHONE: 281-507-3223 -

EMAIL: NDAVE@MONUMENTCHEMICAL.COM

TRANSACTION DATA

TRANSACTION TYPE: DERC_INTEN

DATE ENTERED: 2023-11-14 00:00:00.0

CONTAMINATE: NOX

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: 1.30

DOLLARS:

CERTIFICATE NO.: D3667 COUNTY : HARRIS

TRANSACTION DATA

TRANSACTION TYPE: DERC_RET

DATE ENTERED: 2023-11-14 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR:

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

TONS: **0.20** DOLLARS: **0**
CERTIFICATE NO.: **D3705** COUNTY : **HARRIS**

TRACKING ACTIVITES

PROJECT RECEIVED BY
PM : 11/14/2023 PROJECT SUBMITTED : 11/14/2023 TEAM LEAD REVIEW : 11/21/2023
SECTION MANAGER
REVIEW : 11/28/2023

Portfolio Detail

Portfolio Number: P3957
Portfolio Name: NOVA MOLECULAR TECHNOLOGIES - RN100925551
Company Name: MONUMENT CHEMICAL BAYPORT LLC

-Actual Allowances for Pollutant NOX-

[illegible]

-Sb7 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	0	0	0	0	0	0	0

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
D3466	NOX	0.40	DERC_RET	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3466	NOX	0.40	DERC_INTEN	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3434	NOX	0.10	DERC_BUY	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3348
D3438	NOX	0.10	DERC_RET	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3621	NOX	0.80	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3570
D3667	NOX	1.50	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3562
D3438	NOX	0.10	DERC_INTEN	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3466	NOX	0.40	DERC_USE	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3480	NOX	0.40	DERC_USE	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3544	NOX	0.60	DERC_USE	06/16/2021	01/01/1993	12/31/1994	BRAZORIA	D3436
D3666	NOX	0.60	DERC_USE	05/22/2023	01/01/2000	12/31/2000	HARRIS	D3562
D3562	NOX	4.00	DERC_INTEN	05/22/2023	01/01/2000	12/31/2000	HARRIS	D3323
D3562	NOX	4.00	DERC_BUY	05/22/2023	01/01/2000	12/31/2000	HARRIS	D3323
D3434	NOX	0.10	DERC_USE	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3348
D3435	NOX	0.10	DERC_INTEN	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3392
D3437	NOX	0.50	DERC_BUY	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3430
D3438	NOX	0.10	DERC_USE	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3570	NOX	1.90	DERC_RET	11/18/2022	01/01/2000	12/31/2000	HARRIS	D3562
D3570	NOX	1.90	DERC_INTEN	11/18/2022	01/01/2000	12/31/2000	HARRIS	D3562
D3433	NOX	0.60	DERC_USE	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3149
D3433	NOX	0.60	DERC_INTEN	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3149
D3436	NOX	1.40	DERC_BUY	06/16/2021	01/01/1993	12/31/1994	BRAZORIA	D3417
D3433	NOX	0.60	DERC_BUY	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3149
D3436	NOX	1.40	DERC_INTEN	06/16/2021	01/01/1993	12/31/1994	BRAZORIA	D3417
D3437	NOX	0.50	DERC_INTEN	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3430
D3545	NOX	0.40	DERC_INTEN	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3434	NOX	0.10	DERC_INTEN	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3348
D3435	NOX	0.10	DERC_USE	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3392
D3435	NOX	0.10	DERC_BUY	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3392
D3545	NOX	0.40	DERC_RET	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3545	NOX	0.40	DERC_USE	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3667	NOX	1.50	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3562
D3705	NOX	0.20	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3667

Confirm Records to Send to TCEQ

Portfolio Number:P3957
Data current as of:11/14/2023

Project Information

Project Number: 418419
Portfolio Number: P3957
Customer Name: MONUMENT CHEMICAL BAYPORT LLC
Customer Reference Number: CN605613991
Regulated Entity: NOVA MOLECULAR TECHNOLOGIES
Regulated Entity Reference Number: RN100925551
Account Name: HG6473T

Certification and Submission

Certificate	Pollutant	End Date	Amount Available (tpy)	Amount to be Used (tpy)	Use Period Start Date	Use Period End Date	Reason for Use	Permit Number	Ratio	Compliance Year
D3667	NOX		1.50	1.30	01/01/2024	12/31/2024	30 TAC CHAPTER 117	79193		

Supporting Documentation

1 file(s) attached.
P3957 -Monument Chemical Bayport 2024 Notice of In

Contact Information

Primary Contact Name: NARAYAN DAVE
Address: 16717 JACINTOPORT BLVD HOUSTON, TX 77015
Phone: 281-507-3223
Email: NDAVE@MONUMENTCHEMICAL.COM
Technical Contact Name: NARAYAN DAVE
Phone: 281-507-3223
Email: NDAVE@MONUMENTCHEMICAL.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 Narayan S Dave.

Signature Hash: 148C0D4BC64D134B4F40BB3E0061DA614602520F5620A63EF71B37E5A96E1C18

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

Submission IP address: 216.250.226.5

Submission date and time: 11/14/2023

Submission STEERS Version: 6.70

Submission Confirmation Number: 16009

Submission Data Hash Code: 5087F9182E9DF5547DBE4207FDE099CE6B577B42F33F24023C28AADB66451B41

2024 NOI DERC Use Calculations: January 01, 2024 thru December 31, 2024 Compliance Period

DERCs Needed = ELA X (EER-RER)/ 2000 lb/ton + 10% environmental contribution

Where:

ELA = expected level of activity

EER = expected emission rate per unit activity

RER = regulatory emission rate per unit of activity

Heater: H-02

Assumption:

Expected Level of Activity	=	80,000.0	MMBtu/yr	
Expected Emis. Rate	=	0.0617	lb/MMBtu	(from July 2012 stack test)
Regulatory Emis Rate	=	0.036	lb/MMBtu	

$$\begin{aligned}
 \text{DERCs Needed} &= (((80,000.0 \text{ MMBtu/yr} \times 0.0617 \text{ lb/MMBtu}) - (80,000.0 \text{ MMBtu/yr} \times 0.036 \text{ lb/MMBtu})) / 2000 \text{ lb/ton}) \\
 &= 1.028 \text{ tons/year} \\
 1.1 \text{ tons/year} + 10\% \text{ environmental contribution} &= 1.21 \text{ tons/year}
 \end{aligned}$$

Total DERCs Needed = 1.30 tons/year
(rounded up to nearest tenth)





Element Materials Technology
222 Cavalcade Street
Houston, TX
77009-3213 USA

P 713 692-9151
F 713 698-8274
T 888 786 7555
www.element.com
Info.houston@element.com

AIR EMISSIONS TESTING

Nova Molecular Technologies, Inc.
10200 Bay Area Boulevard
Pasadena, Texas 77507

Date: July, 2012
Author: Wes Bear
Report Number: EHO003631P
2012

COMPLIANCE EMISSIONS TEST PROGRAM HOT OIL HEATER TCEQ RULE 117

INTRODUCTION

A compliance emissions test program on the Hot Oil Heater located at the Nova Molecular Technologies, Inc. (Nova) Bayport Industrial Complex in Pasadena, Texas was performed by personnel of Element Materials Technology Houston, Inc. (Element) Air Emissions Services (AES) Division. Present at times during the sample program were: Mr. Bob Wolff, Jr. and staff of Nova and Mr. Wes Bear of Element. Testing for NO_x, CO and O₂ emissions was performed on July 2, 2012.

Sampling was conducted to determine the emissions of nitrogen oxides (NO_x), carbon monoxide (CO) and oxygen (O₂) from the heater for an evaluation of pollutant levels. A total of three (3) sixty (60) minute sample runs were performed for each pollutant. In general, Environmental Protection Agency (EPA) Reference Methods 3A, 7E, 10 and 19 and Texas Commission on Environmental Quality (TCEQ) protocols were utilized during the sampling and analytical program. Testing was performed to satisfy TCEQ Rule 117 (30 TAC 117) requirements.

RESULTS

Results of the individual runs, calculated in accordance with EPA and TCEQ procedures, are contained in the Tables section of this report. The average emissions are shown as follows.

Source	Pollutant	Average Concentration		Average Emission Rate lb/mmBtu**
		ppmvd	ppmvd @ 3% O ₂	
Hot Oil Heater	NO _x *	42.59	50.80	0.0617
	CO	<0.10	<0.12	<0.0001
* Calculated as NO ₂ .				
** Calculated at 0% O ₂ using the EPA published fuel F factor for natural gas (8,710 dscf/mmBtu).				

The NO_x emissions exceeded the limits of 0.036 lb/mmBtu [117.2010(c)(1)(A)] or alternately, 30 ppmvd @ 3% O₂. The CO emissions were below the limit of 400 ppmvd @ 3% O₂ [117.2010(i)]. The TECQ Rule 117 standards were provided by Nova personnel.

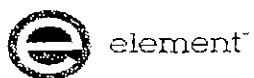


TABLE NO. 2

SUMMARY OF SAMPLING RESULTS - NO_x, CO and O₂

Nova Molecular Technologies, Inc.
Pasadena, Texas

Element Project No. EHO003631P

Run No.	Date	Time Period	Nitrogen Oxides (NOx)*			Carbon Monoxide (CO)			Oxygen (O ₂)
			ppmvd	ppmvd @ 3% O ₂	lb/mmBtu	ppmvd	ppmvd @ 3% O ₂	lb/mmBtu	% (dry)
Hot Oil Heater									
1	7/2/2012	1410-1510	42.17	50.94	0.0619	<0.10	<0.12	<0.0001	6.08
2	7/2/2012	1527-1627	43.01	50.74	0.0616	<0.10	<0.12	<0.0001	5.72
3	7/2/2012	1644-1744	42.59	50.73	0.0616	<0.10	<0.12	<0.0001	5.87
Average:			42.59	50.80	0.0617	<0.10	<0.12	<0.0001	5.89

* NO_x emissions rate data are quantified as NO₂.

From: [Rebecca Partee](#)
To: [PSSMGR](#)
Cc: [EBTTL](#); [Joseph Musa](#)
Subject: RE: For Review and Approval by 12/1/23: DERC Intent 418419
Date: Monday, December 4, 2023 7:19:39 AM

Approved

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Wednesday, November 29, 2023 2:44 PM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Joseph Musa <joseph.musa@tceq.texas.gov>
Subject: FW: For Review and Approval by 12/1/23: DERC Intent 418419

Please see the attached documents for DERC Intent to Use 418419.

From: EBTTL <EBTTL@tceq.texas.gov>
Sent: Tuesday, November 28, 2023 4:06 PM
To: PSSMGR <PSSMGR@tceq.texas.gov>
Cc: Joseph Musa <joseph.musa@tceq.texas.gov>
Subject: For Review and Approval by 12/1/23: DERC Intent 418419

Hi Daniel,

Please see the attached documents for DERC Intent to Use 418419. Let us know if you have any questions.

Thanks,
Melissa

From: Joseph Musa <joseph.musa@tceq.texas.gov>
Sent: Tuesday, November 21, 2023 10:38 AM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For Review and Approval by 11/27/23: DERC Intent 418419

Melissa:

Please see the attached documents for the referenced project.

Joseph

From: [Joseph Musa](#)
To: [Dave, Narayan](#)
Cc: Air_Permits@pcs.hctx.net; kperez@pasadenatx.gov
Subject: TCEQ EBT Document - DERC Intent
Date: Tuesday, December 5, 2023 9:39:00 AM
Attachments: [418419 Monument Chemical Bayport, LLC.pdf](#)

Please see the attached EBT document for project number 418419. 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