

Jon Niermann, *Chairman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 8, 2024

PRENTICE C. JAMES
REGIONAL EH&S MANAGER
ROHM AND HAAS TEXAS INCORPORATED
332 STATE HIGHWAY 332 EAST, APB2A1
LAKE JACKSON, TEXAS 77566
Via email

Subject: Notice of Intent to Use Discrete Emission Credits
Rohm and Haas Texas Incorporated
Rohm and Haas Texas Deer Park Plant
Customer Number: CN600131395
Regulated Entity Number: RN100223205
EBT Portfolio Number: P0607
Project Number: 419241

Dear Prentice C. James:

In response to your Notice of Intent to Use Discrete Emission Credits submitted on September 30, 2024, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for compliance with the Mass Emissions Cap and Trade (MECT) Program under 30 Texas Administrative Code (TAC) Chapter 101, Subchapter H, Division 3. A Notice of Use of Discrete Emission Credits application must be submitted by March 31.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Retained Certificate	Amount Retained (tons)
NO _x	1/1/2024 - 12/31/2024	D2548	477.0	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 Emissions Banking and Trading (EBT) Program, please contact Marie Mercado at Marie.Mercado@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.

Samuel Short, Deputy Director
Air Permits Division
Office of Air

cc: Director, Harris County, Pollution Control Services, Pasadena

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

Project Number:	419241	Project Manager:	Marie Mercado
Customer Reference No.:	CN600131395	Company Name:	Rohm and Haas Texas Incorporated
Regulated Entity Reference No.:	RN100223205	Site Name:	Rohm and Haas Texas Deer Park Plant
Portfolio Number:	P0607	County:	Harris

Project Overview

Review	Explanation
Application Submitted Date:	9/30/2024
Intent Amount and Certificate(s):	477.0 tons from Certificate Number D2548
Pollutant:	Nitrogen Oxides (NO _x)
Reason for Use:	Compliance with the Mass Emissions Cap and Trade (MECT) Program under 30 Texas Administrative Code (TAC) Chapter 101, Subchapter H, Division 3
Use period:	1/1/2024 - 12/31/2024
Retained Amount and Certificate(s):	N/A
Additional Information:	There was a noted discrepancy with the Use Period. The State of Texas Electronic Reporting System (STEERS) DERC Intent to Use application provided the use period as 1/1/2025 - 3/31/2025. The electronic pdf DERC Intent to Use Application provided the use period as 1/1/2024 - 12/31/2024. The company confirmed in an e-mail dated 10/21/2024 that the correct use period is 1/1/2024 - 12/31/2024. The Emissions Banking and Trading (EBT) Database was updated to reflect 1/1/2024 - 12/31/2024. The DERCs were generated in 1994, so per §101.356(h)(2) they are used at a ratio of 10:1. Per §101.356(h)(6)(B), if the amount of DERCs requested to be used for MECT compliance exceeds 250 tons, the amount in excess of 250 tons may be reduced so that the total amount of all DERCs used by all sites does not exceed 10,000 tons. As of the 10/1/2024 deadline, the requested amount of DERCs for MECT compliance does not exceed 10,000 tons.

Calculation Methodology

For DERCs generated before 2005, the use ratio is 10:1; therefore, 477.0 tons of DERCs need to be allocated to cover 47.7 tons of potential emissions for the 2024 control period.

Conclusion

The Texas Commission on Environmental Quality (TCEQ) is approving the request to set aside 477.0 tons of NO_x DERCs from Certificate Number D2548 for compliance with the MECT Program under 30 TAC Chapter 101, Subchapter H, Division 3 during the use period of January 1, 2024 - December 31, 2024.

11/08/2024 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 419241 STATUS: C DISP CODE: _____
RECEIVED: 09/30/2024 PROJTYPE: BDIU ISSUED DT: _____
SUP-DISP DATE: 11/08/2024

STAFF ASSIGNED TO PROJECT:

MERCADO, MARIE

PROJECT NOTES:

.ROHM AND HAAS TEXAS INC. DEER PARK PLANT RN100223205 INTENDS TO USE DERCS TO SUPPLEMENT ITS MASS EMISSION CAP AND TRADE ALLOWANCE REQUIREMENTS FOR THE 2024 CONTROL PERIOD.

[.Attachments](#) from Steers

[.Copy Of Record](#) from Steers

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: ROHM AND HAAS TEXAS INCORPORATED

CUSTOMER REGISTRY ID: CN600131395

PORTFOLIO DATA

NUMBER: P0607 NAME: ROHM AND HAAS TEXAS DEER PARK - RN100223205

SITE DATA

ACCOUNT: HG0632T

REG ENTITY ID: RN100223205

SITE NAME: ROHM AND HAAS TEXAS DEER PARK PLANT

COUNTY: HARRIS

NEAREST CITY: DEER PARK

LOCATION: 1900 TIDAL ROAD, DEER PARK, TEXAS 77536

CONTACT DATA

NAME: PRENTICE C JAMES

TITLE: REGIONAL EH&S MANAGER

ROLE: AAR

STREET: 332 SH 332 E, APB2A1

CITY/STATE, ZIP: LAKE JACKSON, TX , 77566-

PHONE: 979-238-1443 -

EMAIL: PCJAMES@DOW.COM

TRANSACTION DATA

TRANSACTION TYPE: DERC_INTEN

DATE ENTERED: 2024-09-30 00:00:00.0

DELETED DATE:

EFFECTIVE YEAR: 2024

CONTAMINATE: **NOX**

TONS: **477.00**

DOLLARS:

ALLOWANCE1

CERTIFICATE NO.: **D2548** COUNTY : **HARRIS**

TRACKING ACTIVITIES

PROJECT SUBMITTED : 09/30/2024 PROJECT RECEIVED BY PM : 09/30/2024

TR - DEFICIENCY CYCLE : 10/11/2024 10/21/2024

TEAM LEAD REVIEW : 10/24/2024 SECTION MANAGER REVIEW : 11/04/2024

Portfolio Detail

Portfolio Number: P0607
Portfolio Name: ROHM AND HAAS TEXAS DEER PARK - RN100223205
Company Name: ROHM AND HAAS TEXAS INCORPORATED

Actual Allowances for Pollutant NOX

Balance/Year	2020	2021	2022	2023	2024	2025	2026
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>180</u>	<u>180</u>	<u>180</u>	<u>180</u>	<u>180</u>	<u>180</u>	<u>180</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>-180</u>	<u>-180</u>	<u>-180</u>	<u>-180</u>	<u>-180</u>	<u>-180</u>	<u>-180</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	-137.4	-135	-146.1	-145	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>225</u>	<u>150</u>	<u>160</u>	<u>183.7</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>-137.4</u>	<u>-135</u>	<u>-146.1</u>	<u>-145</u>	<u>-0</u>	<u>-0</u>	<u>-0</u>
DERC Intent	47.7	47.7	47.7	47.7	47.7	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>87.6</u>	<u>15</u>	<u>13.9</u>	<u>38.7</u>	<u>0</u>	<u>0</u>	<u>0</u>

Allowable Allowances

Balance/Year	2020	2021	2022	2023	2024	2025	2026
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
 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
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

-Flexible Allowances for Pollutant NOX-

-Sb7 Allowances for Pollutant NOX-

DERC >

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
D1105	NOX	76.00	DERC_SELL	08/30/2011	08/15/1998	08/14/1999	HARRIS	0
D2548	NOX	477.00	DERC_BUY	12/30/3000	01/01/1994	12/31/1994	BRAZORIA	D1007
D2548	NOX	477.00	DERC_RET	12/30/3000	01/01/1994	12/31/1994	BRAZORIA	D1007
D1105	NOX	76.00	DERC_GEN	08/30/2011	08/15/1998	08/14/1999	HARRIS	0
D2548	NOX	477.00	DERC_INTEN	12/30/3000	01/01/1994	12/31/1994	BRAZORIA	D1007

ERC

Certificate Num	Cont Code	Avail Tons	Transaction Type	Active/Inactive	Gen Date	Exp Date	County	Parent Cert Num
2605	NOX	6.40	ERC_GEN	12/30/3000	04/25/2012	04/25/2017	HARRIS	0
1250	NOX	53.00	ERC_RRVW	10/08/2002	04/01/1995	04/01/2005	HARRIS	1080
1767	NOX	5.40	ERC_USE	09/15/2005	04/01/1995	04/01/2005	HARRIS	1250
1250	NOX	53.00	ERC_INTEN	10/08/2002	04/01/1995	04/01/2005	HARRIS	1080
1767	NOX	5.40	ERC_RET	09/15/2005	04/01/1995	04/01/2005	HARRIS	1250
1250	NOX	53.00	ERC_BUY	10/08/2002	04/01/1995	04/01/2005	HARRIS	1080
1767	NOX	5.40	ERC_INTEN	09/15/2005	04/01/1995	04/01/2005	HARRIS	1250

Confirm Records to Send to TCEQ

Portfolio Number:P0607
Data current as of:09/30/2024

Project Information

Project Number: 419241
Portfolio Number: P0607
Customer Name: ROHM AND HAAS TEXAS INCORPORATED
Customer Reference Number: CN600131395
Regulated Entity: ROHM AND HAAS TEXAS DEER PARK PLANT
Regulated Entity Reference Number: RN100223205
Account Name: HG0632T

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
D2548	NOX		477.00	477.00	01/01/2025	03/31/2025	30 TAC CHAPTER 101, SUBCHAPTER H, DIVISION 3		10.0000	2024

Supporting Documentation

1 file(s) attached.
2024_DPO_Intent to Use.pdf

Contact Information

Primary Contact Name: PRENTICE JAMES
Address: 332 SH 332 E, APB2A1 LAKE JACKSON, TX 77566
Phone: 979-238-1443
Email: PCJAMES@DOW.COM
Technical Contact Name: PRENTICE JAMES
Phone: 979-238-1443
Email: PCJAMES@DOW.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 Prentice C James.

Signature Hash: B45F11DE848D524911F15B93C89112451B23DE77F9D0809D1A768FD46248336B

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

Submission IP address: 170.85.101.14

Submission date and time: 09/30/2024

Submission STEERS Version: 6.82

Submission Confirmation Number: 17496

Submission Data Hash Code: 2179D8B71F9CFB6AB51B6D7A9132566B442854E69C6F39EC4E7C0798E8E6E5EE



Form DEC-2 (Page 1)
Notice of Intent to Use Discrete Emission Credits
(Title 30 Texas Administrative Code § 101.370 - § 101.379)
419241

I. Company Identifying Information			
A. Company Name: Rohm and Haas Company			
Mailing Address: 1900 Tidal Road			
City: Deer Park	State: TX	Zip Code: 77536	
Telephone: 979-238-1443		Fax: 979-235-8117	
B. TCEQ Customer Number (CN): CN600131395			
C. Site Name: Rohm and Haas Texas Inc. Deer Park Plant			
Street Address: 1900 Tidal Road			
Nearest City: Deer Park	Zip Code: 77536	County: Harris	
D. TCEQ Regulated Entity Number (RN): RN100223205			
E. TCEQ Account Number (if applicable): HG-0632-T			
F. Primary SIC:		Air Permit Number:	
II. Technical Contact Identifying Information			
A. Technical Contact Name: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) : Prentice C. James			
Technical Contact Title: Regional Emissions Manager			
Mailing Address: 332 SH 332E, APB2A1			
City: Lake Jackson	State: TX	Zip Code: 77566	
Telephone: 979-238-1443	Fax: 979-235-8117	E-mail: pcjames@dow.com	
III. Company Contact Identifying Information (If different from Technical Contact)			
A. Company Contact Name: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.) :			
Company Contact Title:			
Mailing Address:			
City:	State:	Zip Code:	
Telephone:	Fax:	E-mail:	
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: <u> 1998 </u> Year of Use: <u> 2024 MECT </u> Ratio of DERC to Allowance: <u> 10 </u> to <u> 1 </u>			
<i>Note: If DERC use is to comply with MECT then go to Section IX</i>			
V. Intended Use Period			
Intended Use Start Date: <u> 01 </u> / <u> 01 </u> / <u> 2024 </u>		Intended Use End Date: <u> 12 </u> / <u> 31 </u> / <u> 2024 </u>	



Form DEC-2 (Page 1)
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:

VII. Most Stringent Emission Rate

Describe basis for most stringent allowable emission rate:

☐ Permit _____ ☐ RACT _____ ☐ Other: _____

Notes:

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

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)
								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>47.7</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO _x : <u>10:1</u>	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Compliance Margin (+ 5%) (If DERC use requires > 10 tons)	CO: _____	NO _x : _____	PM ₁₀ : _____	SO ₂ : _____	VOC: _____
Total DERCS	CO: _____	NO_x: <u>477.0</u>	PM₁₀: _____	SO₂: _____	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: D2548
Date on which the DERCS were acquired or will be acquired: 2010
Note: The certificate number is assigned by the TCEQ

XII. Certification by Responsible Official

I, Prentice C. James, 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 Prentice C. James Signature Date September 25, 2023

Title Regional Emissions Manager

From: [James, Prentice \(PC\)](#)
To: [Natalie Namba](#)
Cc: [Marie Mercado](#); [Emily Furlong](#); [Jordan Poe](#); [Melissa Ruano](#)
Subject: RE: Action Required by 10/15/2024: Notice of Deficiency for Union Carbide, Dow Chemical La Porte Site, Rohm and Haas Texas Deer Park Plant, and Dow Texas Operation Freeport's DERC Intent to Use
Date: Monday, October 21, 2024 7:44:15 AM
Attachments: [image001.png](#)
[image002.png](#)

Good morning Natalie,

Hope all is well and thanks for the notification. For the DERC applications in question, the intent to use period for each is indeed 1/1/2024 – 12/31/2024. I agree with your determination.

Apologies for the inconsistencies within STEERS where I used the reporting window instead of the control period timing. I will make note of this and address going forward. Thanks again and please let me know if I need to correct anything within STEERS or if you require additional information.

Kind regards,

Prentice

Prentice C. James
Texas Regional Emissions Manager
The Dow Chemical Company
Office# 979.238.1443
pcjames@dow.com

General Business

From: Natalie Namba <Natalie.Namba@tceq.texas.gov>
Sent: Friday, October 11, 2024 4:51 PM
To: James, Prentice (PC) <PCJAMES@DOW.COM>
Cc: Marie Mercado <Marie.Mercado@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>; Jordan Poe <Jordan.Poe@tceq.texas.gov>; Melissa Ruano <melissa.ruano@tceq.texas.gov>
Subject: Action Required by 10/15/2024: Notice of Deficiency for Union Carbide, Dow Chemical La Porte Site, Rohm and Haas Texas Deer Park Plant, and Dow Texas Operation Freeport's DERC Intent to Use

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. James:

This email is in response to four DERC Intent to Use applications submitted to the Texas Commission on Environmental Quality on 9/28/2024 and 9/30/2024 (EBT Project Numbers 419236, 419237, 419241, and 419243).

The following information is required to proceed with the review of your project:

The intended use period, as reported in the DERC Intent applications, is 1/1/2024 - 12/31/2024. However, in the STEERS submission, the use period for each project is listed as 1/1/2025 – 3/31/2025. We understand that the NO_x DERCs in these projects are intended to be used in lieu of MECT allowances. Therefore, the use period should match the applicable MECT control period, which will be 1/1/2024 – 12/31/2024. Please confirm that you agree with this determination. If yes, we will amend the affected STEERS applications to reflect the use period of 1/1/2024 – 12/31/2024. If you do not agree, please let me know so that we may evaluate further.

Please note that I have included the other project managers on this email as each Intent to Use request was assigned to a different project manager.

Please provide your response by 10/15/2024. Contact me if you have any questions.

Sincerely,



Natalie Namba
Natural Resource Specialist II
Air Permits Division, Office of Air, TCEQ
(512) 239-2583
Natalie.Namba@tceq.texas.gov

✓How is our customer service? Please complete our online Customer Satisfaction Survey at <https://www.tceq.texas.gov/customersurvey>.

From: [Marie Mercado](#)
To: ["PCJAMES@DOW.COM"](mailto:PCJAMES@DOW.COM)
Cc: Air_Permits@pcs.hctx.net
Subject: TCEQ EBT Document - DERC Intent - Rohm and Haas Texas Deer Park Plant
Date: Friday, November 8, 2024 2:35:00 PM
Attachments: [419241 DERC Intent Letter.pdf](#)

Attached: PDF letter

Please see the attached Emissions Banking and Trading (EBT) document for project number 419241. If you have any questions, please see the contact information in the last paragraph of the attached letter.

Texas Commission on Environmental Quality (TCEQ)
EBT Programs
ebt@tceq.texas.gov

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

From: [EBTTL](#)
To: [PSSMGR](#)
Cc: [Marie Mercado](#)
Subject: For Review and Approval by 11/7/2024: DERC Intent to Use 419241
Date: Monday, November 4, 2024 1:23:20 PM
Attachments: [419241 DERC Intent Technical Review.docx](#)
[419241 DERC Intent Letter.docx](#)
[419241 Project File.pdf](#)

Hi Daniel,

Please see the attached documents for DERC Intent to Use Project 419241. Let us know if you have any questions.

Thanks,
Melissa

From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Monday, November 4, 2024 11:15 AM
To: EBTTL <EBTTL@tceq.texas.gov>
Subject: For Review and Approval by 11/7/2024: DERC Intent to Use 419241

Hi Melissa:

I have accepted your edits. Please see the attached documents for DERC Intent to Use 419241 for your review and approval.

Thanks,
Marie

From: EBTTL <EBTTL@tceq.texas.gov>
Sent: Friday, November 1, 2024 4:02 PM
To: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: DERC Intent to Use 419241
Importance: High

Hi Marie,

Please see my edits on your technical review and letter. Please resend when ready.

Thank you,
Melissa

From: Marie Mercado <Marie.Mercado@tceq.texas.gov>
Sent: Thursday, October 24, 2024 2:05 PM
To: EBTTL <EBTTL@tceq.texas.gov>

Subject: For Review and Approval by 10/29/2024: DERC Intent to Use 419241

Hi Melissa:

Please see the attached documents for DERC Intent to Use 419241 for your review and approval.

Thanks,
Marie

From: [APDDIR](#)
To: [Rebecca Partee](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Marie Mercado](#)
Subject: RE: RESEND FW: For Review and Approval by 11/7/2024: DERC Intent to Use 419241
Date: Thursday, November 7, 2024 7:07:45 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: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Sent: Wednesday, November 6, 2024 3:48 PM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Marie Mercado <Marie.Mercado@tceq.texas.gov>
Subject: FW: RESEND FW: For Review and Approval by 11/7/2024: DERC Intent to Use 419241

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR
Sent: Tuesday, November 5, 2024 11:53 AM
To: Rebecca Partee <Rebecca.Partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>
Subject: FW: For Review and Approval by 11/7/2024: DERC Intent to Use 419241

Please see the attached documents for DERC Intent to Use Project 419241.