

Brooke T. Paup, *Chairwoman*
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 5, 2025

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

Subject: Use of Discrete Emission Credits
Monument Chemical Bayport LLC
Nova Molecular Technologies
Customer Number: CN605613991
Regulated Entity Number: RN100925551
EBT Portfolio Number: P3957
Project Number: 419953

Dear Narayan Dave:

This letter is in response to the Notice of Use of Discrete Emission Credits submitted on March 31, 2025, regarding the use of nitrogen oxide (NO_x) discrete emission reduction credits (DERCs) for compliance with 30 Texas Administrative Code (TAC) § 117.2010(b) and (c)(1)(A). The Texas Commission on Environmental Quality (TCEQ) is approving the DERC use as summarized below. Any retained certificates are now available for future use or trade as allowed under 30 Texas Administrative Code Chapter 101, Subchapter H, Division 4.

Pollutant	Use Period	Set Aside Certificate	Amount Set Aside (tons)	Amount Used (tons)	Retained Certificate	Amount Retained (tons)
NO _x	1/1/2024 - 12/31/2024	D3667	1.3	0.5	D3798	0.8

Narayan Dave
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May 5, 2025

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 Emily Furlong at Emily.Furlong@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) Use Technical Review

Project Number:	419953	Project Manager:	Emily Furlong
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:	3/31/2025
Corresponding Intent to Use Project:	418419
Intent Amount and Certificate:	1.3 tons from Certificate D3667
Pollutant:	NO _x
Reason for Use:	Compliance with 30 Texas Administrative Code (TAC) § 117.2010(b) and (c)(1)(A)
Use period:	1/1/2024 - 12/31/2024
Use Amount and Certificate:	0.5 ton from Certificate D3667
Retained Amount and Certificate:	0.8 ton in Certificate D3798
Additional Information:	FIN H-02 is subject to the Emissions Specifications for Attainment Demonstration (ESAD) emission rate of 0.036 lb/MMBtu, per 30 TAC § 117.2010(c)(1)(A). The actual emission rate for the heater is 0.0617 lb/MMBtu according to the stack test completed July 2, 2012. The company is using DERCs to account for the difference in emission rates.

Calculation Methodology

Per 30 TAC § 101.376(e)(2)(A), the actual amount DERCs used to demonstrate compliance or meet regulatory requirement is calculated as follows:

$$DERCs = (ALA) \times (AER - RER)$$

Where:

ALA is the actual level of activity

AER is the actual emission rate

And RER is the regulatory emission rate

The actual level of activity was determined using the heater's fuel usage data from the use period, 30,696.4 million British thermal units (MMBtu). The ESAD rate for the heater is 0.036 lb/MMBtu, while the actual emission rate is 0.0617 lb/MMBtu.

$$DERCs\ used = (30,696.4\ MMBtu) \times \left(0.0617 \frac{lb}{MMBtu} - 0.036 \frac{lb}{MMBtu} \right) \times \frac{1\ ton}{2000\ lbs} = 0.39\ ton$$

The total amount of DERCs used is rounded up to the nearest 0.1 ton. In addition, a 10% environmental contribution of 0.1 ton is added to the amount used, resulting in a total of 0.5 ton of NO_x DERCs used.

Conclusion

The TCEQ is approving the request to use of 0.5 ton 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 D3798 (0.8 ton NO_x) will be returned to the company for future use.

05/05/2025 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 419953 STATUS: C DISP CODE: _____
RECEIVED: 03/31/2025 PROJTYPE: BUSE ISSUED DT: _____
SUP-DISP DATE: 05/05/2025

STAFF ASSIGNED TO PROJECT:

FURLONG, EMILY

PROJECT NOTES:

[.Attachments](#) from Steers

[.Copy Of Record](#) from Steers

.ASSOCIATED DERC INTENT TO USE PROJECT NUMBER 418419

.USE PERIOD: 1/1/2024 - 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_RET

DATE ENTERED: 2025-03-31 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: **0.80**

DOLLARS: **0**

CERTIFICATE NO.: **D3798** COUNTY : **HARRIS**

TRANSACTION DATA

TRANSACTION TYPE: DERC_USE

DATE ENTERED: 2025-03-31 00:00:00.0

CONTAMINATE: **NOX**

DELETED DATE:

EFFECTIVE YEAR:

TONS: **0.50**

DOLLARS:

TRACKING ACTIVITES

PROJECT SUBMITTED : 03/31/2025 PROJECT RECEIVED BY PM : 04/02/2025 TEAM LEAD REVIEW : 04/29/2025
SECTION MANAGER REVIEW : 04/30/2025

Portfolio Detail

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

-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>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	0	0	0	0	0	0	0

-Sb7 Allowances for Pollutant NOX-

Balance/Year	2020	2021	2022	2023	2024	2025	2026
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
D3727	NOX	0.30	DERC_USE	04/15/2024	01/01/2000	12/31/2000	HARRIS	D3570
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
D3438	NOX	0.10	DERC_RET	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3768	NOX	0.50	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3728
D3434	NOX	0.10	DERC_BUY	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3348
D3438	NOX	0.10	DERC_INTEN	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3480	NOX	0.40	DERC_USE	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3666	NOX	0.60	DERC_USE	05/22/2023	01/01/2000	12/31/2000	HARRIS	D3562
D3667	NOX	1.50	DERC_RET	12/05/2023	01/01/2000	12/31/2000	HARRIS	D3562
D3466	NOX	0.40	DERC_USE	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3621	NOX	0.80	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3570
D3621	NOX	0.80	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3570
D3544	NOX	0.60	DERC_USE	06/16/2021	01/01/1993	12/31/1994	BRAZORIA	D3436
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
D3438	NOX	0.10	DERC_USE	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3437
D3570	NOX	1.90	DERC_RET	04/15/2024	01/01/2000	12/31/2000	HARRIS	D3562
D3570	NOX	1.90	DERC_INTEN	04/15/2024	01/01/2000	12/31/2000	HARRIS	D3562
D3434	NOX	0.10	DERC_USE	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3348
D3437	NOX	0.50	DERC_BUY	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3430
D3435	NOX	0.10	DERC_INTEN	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3392
D3667	NOX	1.50	DERC_INTEN	12/05/2023	01/01/2000	12/31/2000	HARRIS	D3562
D3436	NOX	1.40	DERC_BUY	06/16/2021	01/01/1993	12/31/1994	BRAZORIA	D3417
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
D3545	NOX	0.40	DERC_INTEN	06/13/2022	01/01/1993	12/31/1994	BRAZORIA	D3436
D3436	NOX	1.40	DERC_INTEN	06/16/2021	01/01/1993	12/31/1994	BRAZORIA	D3417
D3728	NOX	0.80	DERC_RET	12/18/2024	01/01/2000	12/31/2000	HARRIS	D3570
D3437	NOX	0.50	DERC_INTEN	04/27/2020	01/01/1993	12/31/1994	BRAZORIA	D3430
D3433	NOX	0.60	DERC_BUY	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3149
D3798	NOX	0.80	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3667
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
D3434	NOX	0.10	DERC_INTEN	04/27/2020	05/01/2003	04/30/2004	HARRIS	D3348
D3728	NOX	0.80	DERC_INTEN	12/18/2024	01/01/2000	12/31/2000	HARRIS	D3570
D3705	NOX	0.20	DERC_RET	12/30/3000	01/01/2000	12/31/2000	HARRIS	D3667

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

Confirm Records to Send to TCEQ

Portfolio Number:P3957
Data current as of:03/31/2025

Project Information

Project Number: 419953
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

Imported Intent Project:418419

Certificate	Pollutant	DERC Source	Intent Amount(ton)	Amount Used(ton)	Use Period Start Date	Use Period End Date	Reason for Use	Retained Certificate	Amount Retained(ton)	Permit Number
D3667	NOX	NON ROAD (MOBILE)	1.30	0.50	01/01/2024	12/31/2024	COMPLIANCE WITH 30 TAC 117.2010(b) AND (C)(1)(A)	N/A	0.8	79193

Supporting Documentation

3 file(s) attached.
MCBP-2024 NOx DERC report supporting calc2.pdf
MCBP-2024 NOx DERC report supporting calc.pdf
MCBP- 2012 stack test page for 2024 DERC supportin

Contact Information

Primary Contact Name: NARAYAN DAVE
Address: 16717 JACINTOPOINT 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: 20D6D1C5A885D29662D9C00CC36E753DB260EBCCB4D03370BB729CD14348402A

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

Submission IP address: 216.250.226.5

Submission date and time: 03/31/2025

Submission STEERS Version: 6.89

Submission Confirmation Number: 18739

Submission Data Hash Code: C1DC4B213E3EFBA5B5E98ED39BB5AE41D55D7D6CD3DD51B063E5882B93650B46



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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.

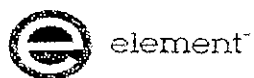


TABLE NO. 2

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.

2024 Annual Natural Gas Fuel Usage
January 1, 2024- December 31, 2024
Source: Hot Oil Heater (H-02)

DERCs Used

Months	H-02	Monthly	Cumulative
	MMBtu/Month	Tons	Tons
January	788.7	0.010	0.010
February	723.6	0.009	0.019
March	2837.3	0.036	0.056
April	665.5	0.009	0.064
May	2377.2	0.031	0.095
June	3146.0	0.040	0.135
July	3232.3	0.042	0.177
August	3160.8	0.041	0.218
September	3132.7	0.040	0.258
October	4185.9	0.054	0.312
November	3236.7	0.042	0.353
December	3209.7	0.041	0.394
MMBtu/yr	<u>30,696.4</u>	<u>0.394</u>	

DERCs Used = ALA X (AER-RER) / 2000 lb/ton

Where:

ALA = actual level of activity (MMBtu)

AER = actual emission rate per unit activity

0.0617 lb/MMBtu

RER = regulatory emission rate per unit of activity

0.036 lb/MMBtu

2024 DERC Use Calculations: January 01, 2024 thru December 31, 2024 Compliance Period
DERCs Used = ALA X (AER-RER)/ 2000 lb/ton + 10% environmental contribution

Where:

ALA = actual level of activity

AER = actual emission rate per unit activity

RER = regulatory emission rate per unit of activity

Heater: H-02

Assumption:

Maximum runtime = 8760 hr/yr
Actual Fuel Usage = 30,696.0 MMBtu/yr
Actual Emis. Rate = 0.0617 lb/MMBtu (from July 2012 stack test)
Regulatory Emis Rate = 0.036 lb/MMBtu

DERCs Used = (30,696.0 MMBtu/yr X 0.0617 lb/MMBtu) - (30,696.0 MMBtu/yr X 0.036 lb/MMBtu),
= 0.39 tons/year

Total:

0.40 tons/year + 10% environmental contribution = 0.44 tons/year
(rounded up to nearest tenth of a ton) = 0.5 tons/year

Total DERCs Needed = 0.44 tons/year
--

Total DERCs Used = 0.5 tons/yr
2023 NOI = 1.3 tons/yr
Variance = 0.8 tons/yr

From: [Emily Furlong](#)
To: [Dave, Narayan](#)
Cc: air_permits@pcs.hctx.net; kperez@pasadenatx.gov
Subject: TCEQ EBT Documents - Use of Discrete Emission Credits - Nova Molecular Technologies
Date: Monday, May 5, 2025 9:32:00 AM
Attachments: [419953 DERC Use Letter.pdf](#)

Please see the attached EBT document for project number 419953. 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

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: [APDDIR](#)
To: [Rebecca Partee](#); [APDDIR](#)
Cc: [PSSMGR](#); [EBTTL](#); [Emily Furlong](#)
Subject: RE: For Review and Approval by 5/5/2025: DERC Use 419953
Date: Monday, May 5, 2025 8:55:52 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: Friday, May 2, 2025 6:23 PM
To: APDDIR <APDDIR@tceq.texas.gov>
Cc: PSSMGR <PSSMGR@tceq.texas.gov>; EBTTL <EBTTL@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Subject: FW: For Review and Approval by 5/5/2025: DERC Use 419953

Sam,

Please see the attached for your approval.

Thank you,
Rebecca

From: PSSMGR <PSSMGR@tceq.texas.gov>
Sent: Friday, May 2, 2025 10:39 AM
To: Rebecca Partee <rebecca.partee@tceq.texas.gov>
Cc: EBTTL <EBTTL@tceq.texas.gov>; Emily Furlong <Emily.Furlong@tceq.texas.gov>
Subject: FW: For Review and Approval by 5/5/2025: DERC Use 419953

Please see the attached documents for DERC Use Project 419953.