

Brooke T. Paup, *Chairwoman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

June 19, 2025

PRENTICE C. JAMES  
REGIONAL EH&S MANAGER  
THE DOW CHEMICAL COMPANY  
332 SH 332 E, APB2A1  
LAKE JACKSON, TEXAS 77566  
Via email

Subject: Notice of Intent and Use of Discrete Emission Credits  
The Dow Chemical Company  
Dow Texas Operations Freeport  
Customer Number: CN600356976  
Regulated Entity Number: RN100225945  
EBT Portfolio Number: P0182  
Project Number: 420044 and 420045

Dear Prentice C. James:

In response to your Notice of Intent to Use Discrete Emission Credits submitted on April 30, 2025, the Texas Commission on Environmental Quality (TCEQ) set-aside the following credits for compliance with the offset requirements in New Source Review (NSR) Permit Number 20432, Special Condition 35, as allowed under 30 Texas Administrative Code (TAC) §101.376(b)(2)(A). 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)	Retained Certificate	Amount Retained (tons)
NO <sub>x</sub>	9/15/2025 - 9/14/2027	D3683	62.4	D3799	81.6

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 Natalie Namba at [Natalie.Namba@tceq.texas.gov](mailto:Natalie.Namba@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", with a long horizontal line extending to the right.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air

cc: Director, Environmental Health, Brazoria County Health Department, Angleton  
P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • [tceq.texas.gov](http://tceq.texas.gov)

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

Project Number:	420044 and 420045	Project Manager:	Natalie Namba
Customer Reference No.:	CN600356976	Company Name:	The Dow Chemical Company
Regulated Entity Reference No.:	RN100225945	Site Name:	Dow Texas Operations Freeport
Portfolio Number:	P0182	County:	Brazoria

### Project Overview

Review	Explanation
Application Submitted Date:	4/30/2025
Intent Amount and Certificate(s):	62.4 tons from Certificate Number D3683
Pollutant:	NO <sub>x</sub>
Reason for Use:	Offsets for New Source Review (NSR) Permit Number 20432, as allowed under §101.376(b)(2)(A).
Use period:	9/15/2025 - 9/14/2027
Retained Amount and Certificate(s):	81.6 tons in Certificate Number D3799
Additional Information:	<p>Special Condition 35 of NSR Permit Number 20432 requires the use of DERCs every year to offset the emission increases for facilities authorized under this permit. The previous application, EBT Project Number 418263, provided sufficient DERCs to satisfy the permit's NO<sub>x</sub> offset requirement from September 15, 2023 to September 14, 2025.</p> <p>This application was submitted per §101.376(b)(2)(A) to cover the operation of these facilities for the specified period noted above.</p>

### Calculation Methodology

Special Condition 35 of the permit requires the use of 31.2 tons per year (tpy) of NO<sub>x</sub> credits to offset the 26.0 tpy emission increase at an offset ratio of 1.20 to 1.0. This amount includes the offset ratio of 5.2 tpy (26.0 tpy multiplied by 0.2). Per §101.376(b)(2)(B), either the environmental contribution of 10% or the offset ratio, whichever is higher, shall be retired. The environmental contribution of 2.6 tpy is less than the offset ratio of 5.2 tpy. Therefore, the company would need 62.4 tpy of DERCs for the use period.

With the offset ratio of 1.20 to 1.0 specified in the permit, the calculated amount of 62.4 tons of NO<sub>x</sub> DERCs is sufficient for compliance. The compliance margin of 5%, as required by §101.376(d)(2)(E), was determined to be unnecessary by management for the purposes of NSR offsets.

### Conclusion

The TCEQ is approving the request to set aside 62.4 tons of NO<sub>x</sub> DERCs from Certificate Number D3683 for compliance with NSR Permit Number 20432 during the use period of September 15, 2025 to September 14, 2027. Certificate Number D3799 (81.6 tons NO<sub>x</sub>) will be returned to the company for future use.

06/19/2025 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 420044      STATUS: C      DISP CODE: \_\_\_\_\_  
RECEIVED: 04/30/2025      PROJTYPE: BDIU      ISSUED DT: \_\_\_\_\_  
SUP-DISP DATE: 06/19/2025

**STAFF ASSIGNED TO PROJECT:**

NAMBA, NATALIE

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**PROJECT NOTES:**

.THE PURPOSE OF THIS SUBMITTAL IS TO NOTIFY THE TCEQ THAT DOW TEXAS OPERATIONS FREEPORT RN100225945 INTENDS TO USE DISCRETE EMISSION REDUCTION CREDITS TO OFFSET THE PERMIT REQUIREMENTS FOR NSR 20432 / PSDTX994M2 / N274 FOR THE 2025 - 2027 CONTROL PERIODS.

[.Attachments](#) from Steers

[.Copy Of Record](#) from Steers

.USE PERIOD: 9/15/2025 - 9/14/2027

.TARGET DATE: 6/29/2025 (THIS DATE FALLS DURING THE WEEKEND, PLEASE TRY TO COMPLETE BY 6/27/2025.)

.CERTIFICATE NUMBER D3683

.6/3/2025: NOD SENT TO COMPANY VIA EMAIL ON 6/3 TO CONFIRM THE INTENDED USE PERIOD. RESPONSE DUE BY 6/6. RECEIVED AN AUTOMATIC EMAIL RESPONSE INDICATING THAT THE AAR IS OUT OF OFFICE AND WILL RETURN ON 6/11. NO OTHER CONTACTS ARE ON FILE. RESPONSE RECEIVED ON 6/10.

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**PROJECT TRANSACTIONS**

**COMPANY DATA**

COMPANY NAME: THE DOW CHEMICAL COMPANY

CUSTOMER REGISTRY ID: CN600356976

**PORTFOLIO DATA**

NUMBER: P0182 NAME: DOW TEXAS OPERATIONS FREEPORT - RN100225945

**SITE DATA**

ACCOUNT: BL0082R

REG ENTITY ID: RN100225945

SITE NAME: DOW TEXAS OPERATIONS FREEPORT

COUNTY: BRAZORIA

NEAREST CITY: FREEPORT

LOCATION: 2301 N BRAZOSPORT BLVD, STE B1226,  
FREEPORT (HWY 288)

**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: 2025-04-30 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: **62.40**

DOLLARS:

CERTIFICATE NO.: **D3683** COUNTY : **BRAZORIA**

**TRANSACTION DATA**

TRANSACTION TYPE: DERC\_RET

DATE ENTERED: 2025-04-30 00:00:00.0

CONTAMINATE: **NOX**

ALLOWANCE0

DELETED DATE:

EFFECTIVE YEAR:

TONS: **81.60**

DOLLARS: **0**

CERTIFICATE NO.: **D3799** COUNTY : **BRAZORIA**

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**TRACKING ACTIVITES**

PROJECT SUBMITTED : 04/30/2025 PROJECT RECEIVED BY 05/01/2025  
PM :  
TR - DEFICIENCY CYCLE : 06/03/2025 06/10/2025  
TEAM LEAD REVIEW : 06/10/2025 SECTION MANAGER  
REVIEW : 06/12/2025

06/19/2025 ----- EBTP IMS- PROJECT RECORD -----

PROJECT#: 420045      STATUS: C      DISP CODE: \_\_\_\_\_  
RECEIVED: 04/30/2025      PROJTYPE: BUSE      ISSUED DT: \_\_\_\_\_  
SUP-DISP DATE: 06/19/2025

STAFF ASSIGNED TO PROJECT:

NAMBA, NATALIE

PROJECT NOTES:

.THE PURPOSE OF THIS SUBMITTAL IS TO NOTIFY THE TCEQ THAT DOW TEXAS OPERATIONS FREEPORT RN100225945 INTENDS TO USE DISCRETE EMISSION REDUCTION CREDITS TO OFFSET THE PERMIT REQUIREMENTS FOR NSR 20432 / PSDTX994M2 / N274 FOR THE 2025 - 2027 CONTROL PERIODS.

[.Attachments](#) from Steers

[.Copy Of Record](#) from Steers

.USE PERIOD: 9/15/2025 - 9/14/2027

.TARGET DATE: 6/29/2025 (THIS DATE FALLS DURING THE WEEKEND, PLEASE TRY TO COMPLETE BY 6/27/2025.)

.CERTIFICATE NUMBER D3683

.6/3/2025: NOD SENT TO COMPANY VIA EMAIL ON 6/3 TO CONFIRM THE INTENDED USE PERIOD. RESPONSE DUE BY 6/6. RECEIVED AN AUTOMATIC EMAIL RESPONSE INDICATING THAT THE AAR IS OUT OF OFFICE AND WILL RETURN ON 6/11. NO OTHER CONTACTS ARE ON FILE. RESPONSE RECEIVED ON 6/10.

PROJECT TRANSACTIONS

COMPANY DATA

COMPANY NAME: THE DOW CHEMICAL COMPANY  
CUSTOMER REGISTRY ID: CN600356976

PORTFOLIO DATA

NUMBER: P0182 NAME: DOW TEXAS OPERATIONS FREEPORT - RN100225945

SITE DATA

ACCOUNT: BL0082R  
REG ENTITY ID: RN100225945  
SITE NAME: DOW TEXAS OPERATIONS FREEPORT  
COUNTY: BRAZORIA      NEAREST CITY: FREEPORT  
LOCATION: 2301 N BRAZOSPORT BLVD, STE B1226,  
FREEPORT (HWY 288)

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\_USE  
DATE ENTERED: 2025-04-30 00:00:00.0      DELETED DATE:      EFFECTIVE YEAR:  
CONTAMINATE: NOX      TONS: 62.40      DOLLARS:  
ALLOWANCE0      CERTIFICATE NO.: D3803 COUNTY : BRAZORIA

TRACKING ACTIVITES

PROJECT SUBMITTED : 04/30/2025 PROJECT RECEIVED BY 05/01/2025  
PM :

TR - DEFICIENCY CYCLE : 06/03/2025 06/10/2025

TEAM LEAD REVIEW : 06/10/2025 SECTION MANAGER REVIEW : 06/12/2025

**Portfolio Detail**

**Portfolio Number:** P0182  
**Portfolio Name:** DOW TEXAS OPERATIONS FREEPORT - RN100225945  
**Company Name:** THE DOW CHEMICAL COMPANY

**Actual Allowances for Pollutant NOX**

Balance/Year	2020	2021	2022	2023	2024	2025	2026
Penalty from last year	0	0	0	0	0	0	0
Certified Allocation	2466.6	2466.6	2466.6	2466.6	2466.6	2466.6	2466.6
Allowances for Offsets	-49.1	-49.1	-49.1	-49.1	-49.1	-49.1	-49.1
Future Trade In	0	0	0	0	0	0	0
Future Trade Out	-0	-0	-0	-0	-0	-0	-0
Stream Traded In	50.8	50.8	50.8	50.8	50.8	50.8	50.8
Stream Traded Out	-2468.3	-2468.3	-2468.3	-2468.3	-2468.3	-2468.3	-2468.3
Current Traded In	0	0	0	0	0	0	0
Current Traded Out	-0	-0	-0	-0	-0	-0	-0
Total Reported Emissions	-1342.7	-1373.4	-1312.2	-1428.5	-1392.5	0	0
Quantification Penalty	-0	-0	-0	-0	-0	-0	-0
Current Used for Compliance	-0	-0	-0	-0	-0	-0	-0
Vintage From Previous Year	0	0	0	0	0	0	0
Vintage Traded In	1892	1486	1431.1	1860.2	1783.7	0	0
Vintage Traded Out	-0	-0	-0	-0	-0	-0	-0
Vintage Used for Compliance	-1293.6	-1324.3	-1263.1	-1379.4	-1343.4	-0	-0
DERC Intent	300	300	300	300	300	0	0
DERC Use	0	0	0	0	0	0	0
ERC Converted to Allowances	0	0	0	0	0	0	0
<b>CURRENT ALLOWANCE BALANCE</b>	0	0	0	0	0	0	0
<b>VINTAGE ALLOWANCE BALANCE</b>	598.4	161.7	168	480.8	440.3	0	0

**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
<b>BALANCE</b>	0	0	0	0	0	0	0
<b>Starting Allowance for **</b>	0	0	0	0	0	0	0

<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
 <b>Starting Allowance for **</b>	 0	 0	 0	 0	 0	 0	 0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-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

<b>Starting Allowance for **</b>	0	0	0	0	0	0	0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
<b>Starting Allowance for **</b>	0	0	0	0	0	0	0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
<b>Starting Allowance for **</b>	0	0	0	0	0	0	0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
<b>Starting Allowance for **</b>	0	0	0	0	0	0	0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
<b>Starting Allowance for</b>	0	0	0	0	0	0	0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0
<b>Starting Allowance for **</b>	0	0	0	0	0	0	0
<b>Deficit</b>	0	0	0	0	0	0	0
<b>Actual Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Quantification Penalty</b>	0	0	0	0	0	0	0
<b>BALANCE</b>	0	0	0	0	0	0	0

\*\* This fin was recertified.

#### Flexible Allowances for Pollutant NOX

Balance	2020	2021	2022	2023	2024	2025	2026
<b>Flexible Allowance</b>	0	0	0	0	0	0	0
<b>Penalty</b>	0	0	0	0	0	0	0

**Associated Annual Emissions**

-0 -0 -0 -0 -0 -0 -0

**BALANCE**

0 0 0 0 0 0 0

**Sb7 Allowances for Pollutant NOX**

Balance/Year	2020	2021	2022	2023	2024	2025	2026
<b>Previous Year Deficit</b>	0	0	0	0	0	0	0
<b>Allowances Remaining from Previous Year</b>	0	0	0	0	0	0	0
<b>Allocation</b>	0	0	0	0	0	0	0
<b>Current Traded In</b>	0	0	0	0	0	0	0
<b>Current Traded Out</b>	-0	-0	-0	-0	-0	-0	-0
<b>Stream Traded In</b>	0	0	0	0	0	0	0
<b>Stream Traded Out</b>	-0	-0	-0	-0	-0	-0	-0
<b>Total Reported Emissions</b>	-0	-0	-0	-0	-0	-0	-0
<b>Remaining Balance</b>	0	0	0	0	0	0	0

**DERC >**

Certificate Num	Cont Code	Avail Tons	Transaction Type	Inactive Date	Gen Start Date	Gen End Date	County	Parent Cert Num
<a href="#">1150-1674</a>	NOX	525.00	DERC_GEN	01/26/2000	12/30/3000		BRAZORIA	
<a href="#">D1003</a>	NOX	7841.00	DERC_RET	11/15/2004	11/01/1994	12/31/1997	BRAZORIA	
<a href="#">D1023</a>	NOX	2375.40	DERC_SELL	08/25/2010	01/01/2001	12/31/2001	BRAZORIA	0
<a href="#">D2546</a>	NOX	2000.00	DERC_SELL	09/03/2010	01/01/2001	12/31/2001	BRAZORIA	D1023
<a href="#">D2734</a>	NOX	433.90	DERC_RET	08/30/2011	01/01/2000	12/31/2000	BRAZORIA	D2568
<a href="#">D3556</a>	NOX	206.40	DERC_INTEN	08/25/2023	01/01/2000	12/31/2000	BRAZORIA	D3444
<a href="#">D1148</a>	NOX	126.60	DERC_SELL	01/14/2010	03/20/1999	11/15/1999	BRAZORIA	0
<a href="#">D1149</a>	NOX	20.10	DERC_GEN	01/14/2010	10/22/1999	11/15/1999	BRAZORIA	
<a href="#">D2452</a>	NOX	13.10	DERC_RET	02/04/2010	10/22/1999	11/15/1999	BRAZORIA	D1149
<a href="#">D2457</a>	NOX	26.60	DERC_SELL	11/18/2010	03/20/1999	11/15/1999	BRAZORIA	D1148
<a href="#">D2477</a>	NOX	3.10	DERC_RET	11/18/2010	10/22/1999	11/15/1999	BRAZORIA	D2452
<a href="#">D2568</a>	NOX	436.90	DERC_RET	02/01/2011	01/01/2000	12/31/2000	BRAZORIA	D2555
<a href="#">D2671</a>	NOX	25.60	DERC_SELL	12/08/2010	03/20/1999	11/15/1999	BRAZORIA	D2457
<a href="#">D2780</a>	NOX	359.90	DERC_RET	08/13/2015	01/01/2000	12/31/2000	BRAZORIA	D2734
<a href="#">D2780</a>	NOX	359.90	DERC_SELL	08/13/2015	01/01/2000	12/31/2000	BRAZORIA	D2734
<a href="#">D3188</a>	NOX	300.00	DERC_RET	08/28/2020	01/01/2000	12/31/2000	BRAZORIA	D2780
<a href="#">D3683</a>	NOX	144.00	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3556
<a href="#">10132-1149</a>	NOX	1018.00	DERC_SELL	09/26/2001	12/30/3000	12/31/1997	BRAZORIA	10132-1149
<a href="#">D1007</a>	NOX	477.00	DERC_RET	08/25/2010	01/01/1994	12/31/1994	BRAZORIA	0
<a href="#">D1012</a>	NOX	3414.00	DERC_RET	09/09/2010	01/01/1998	12/31/1998	BRAZORIA	D1012
<a href="#">D2568</a>	NOX	436.90	DERC_SELL	02/01/2011	01/01/2000	12/31/2000	BRAZORIA	D2555
<a href="#">D2673</a>	NOX	0.10	DERC_RET	09/09/2010	10/22/1999	11/15/1999	BRAZORIA	D2477
<a href="#">D3444</a>	NOX	268.80	DERC_INTEN	09/30/2021	01/01/2000	12/31/2000	BRAZORIA	D3188

<a href="#">D3683</a>	NOX	144.00	DERC_USE	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3556
<a href="#">00091-9931</a>	NOX	9841.00	DERC_GEN	01/26/2000	12/30/3000	12/31/1997	BRAZORIA	00091-9931
<a href="#">10132-1149</a>	NOX	1018.00	DERC_GEN	09/26/2001	12/30/3000	12/31/1997	BRAZORIA	10132-1149
<a href="#">D1003</a>	NOX	7841.00	DERC_SELL	11/15/2004	11/01/1994	12/31/1997	BRAZORIA	
<a href="#">D1006</a>	NOX	218.00	DERC_SELL	09/08/2009	11/01/1994	12/31/1997	BRAZORIA	D1006
<a href="#">D2273</a>	NOX	5541.00	DERC_RET	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2271
<a href="#">D2452</a>	NOX	13.10	DERC_SELL	02/04/2010	10/22/1999	11/15/1999	BRAZORIA	D1149
<a href="#">D2477</a>	NOX	3.10	DERC_SELL	11/18/2010	10/22/1999	11/15/1999	BRAZORIA	D2452
<a href="#">D2768</a>	NOX	1299.10	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D2555
<a href="#">D3188</a>	NOX	300.00	DERC_INTEN	08/28/2020	01/01/2000	12/31/2000	BRAZORIA	D2780
<a href="#">D3687</a>	NOX	62.40	DERC_USE	08/25/2023	01/01/2000	12/31/2000	BRAZORIA	D3556
<a href="#">D3799</a>	NOX	81.60	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3683
<a href="#">11150-1674</a>	NOX	525.00	DERC_GEN	01/26/2000	12/30/3000	12/31/1997	BRAZORIA	
<a href="#">D1022</a>	NOX	2044.00	DERC_RET	09/03/2010	01/01/2000	12/31/2000	BRAZORIA	0
<a href="#">D2273</a>	NOX	5541.00	DERC_SELL	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2271
<a href="#">D2415</a>	NOX	213.00	DERC_RET	09/09/2010	11/01/1994	12/31/1997	BRAZORIA	D1006
<a href="#">D2551</a>	NOX	1700.90	DERC_RET	12/30/3000	01/01/2001	12/31/2001	BRAZORIA	D2546
<a href="#">D3556</a>	NOX	206.40	DERC_RET	08/25/2023	01/01/2000	12/31/2000	BRAZORIA	D3444
<a href="#">D3782</a>	NOX	59.90	DERC_BUY	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3187
<a href="#">0091-7931</a>	NOX	7841.00	DERC_RET	01/26/2000	12/31/1997		BRAZORIA	0091-7931
<a href="#">D1023</a>	NOX	2375.40	DERC_RET	08/25/2010	01/01/2001	12/31/2001	BRAZORIA	0
<a href="#">D1149</a>	NOX	20.10	DERC_SELL	01/14/2010	10/22/1999	11/15/1999	BRAZORIA	
<a href="#">D1187</a>	NOX	7831.00	DERC_SELL	01/31/2007	11/01/1994	12/31/1997	BRAZORIA	D1003
<a href="#">D2166</a>	NOX	7581.00	DERC_SELL	11/18/2009	11/01/1994	12/31/1997	BRAZORIA	D1187
<a href="#">D2190</a>	NOX	7541.00	DERC_SELL	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2166
<a href="#">D2457</a>	NOX	26.60	DERC_RET	11/18/2010	03/20/1999	11/15/1999	BRAZORIA	D1148
<a href="#">D2671</a>	NOX	25.60	DERC_RET	12/08/2010	03/20/1999	11/15/1999	BRAZORIA	D2457
<a href="#">D2768</a>	NOX	1299.10	DERC_INTEN	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D2555
<a href="#">D3444</a>	NOX	268.80	DERC_RET	09/30/2021	01/01/2000	12/31/2000	BRAZORIA	D3188
<a href="#">D3683</a>	NOX	144.00	DERC_RET	12/30/3000	01/01/2000	12/31/2000	BRAZORIA	D3556
<a href="#">91-10131</a>	NOX	10041.00	DERC_GEN	01/26/2000	12/30/3000	12/31/1997	BRAZORIA	
<a href="#">D1007</a>	NOX	477.00	DERC_SELL	08/25/2010	01/01/1994	12/31/1994	BRAZORIA	0
<a href="#">D1148</a>	NOX	126.60	DERC_GEN	01/14/2010	03/20/1999	11/15/1999	BRAZORIA	0
<a href="#">D1187</a>	NOX	7831.00	DERC_RET	01/31/2007	11/01/1994	12/31/1997	BRAZORIA	D1003
<a href="#">D2271</a>	NOX	6541.00	DERC_RET	02/17/2009	11/01/1994	12/31/1997	BRAZORIA	D2190
<a href="#">D2275</a>	NOX	4541.00	DERC_RET	09/09/2010	11/01/1994	12/31/1997	BRAZORIA	D2273
<a href="#">D2551</a>	NOX	1700.90	DERC_INTEN	12/30/3000	01/01/2001	12/31/2001	BRAZORIA	D2546
<a href="#">D2555</a>	NOX	1736.00	DERC_INTEN	05/17/2011	01/01/2000	12/31/2000	BRAZORIA	D1022
<a href="#">D3491</a>	NOX	31.20	DERC_USE	08/28/2020	01/01/2000	12/31/2000	BRAZORIA	D3188
<a href="#">D3561</a>	NOX	62.40	DERC_USE	09/30/2021	01/01/2000	12/31/2000	BRAZORIA	D3444

<a href="#">10932-1149</a>	NOX	218.00	DERC_RET	01/26/2000	12/31/1997		BRAZORIA	
<a href="#">1150-1626</a>	NOX	477.00	DERC_RET	01/26/2000	12/31/1994		BRAZORIA	
<a href="#">D1006</a>	NOX	218.00	DERC_RET	09/08/2009	11/01/1994	12/31/1997	BRAZORIA	D1006
<a href="#">D1021</a>	NOX	2965.00	DERC_RET	09/09/2010	01/01/1999	11/15/1999	BRAZORIA	D1021
<a href="#">D1022</a>	NOX	2044.00	DERC_SELL	09/03/2010	01/01/2000	12/31/2000	BRAZORIA	0
<a href="#">D2166</a>	NOX	7581.00	DERC_RET	11/18/2009	11/01/1994	12/31/1997	BRAZORIA	D1187
<a href="#">D2190</a>	NOX	7541.00	DERC_RET	02/13/2009	11/01/1994	12/31/1997	BRAZORIA	D2166
<a href="#">D2271</a>	NOX	6541.00	DERC_SELL	02/17/2009	11/01/1994	12/31/1997	BRAZORIA	D2190
<a href="#">D2546</a>	NOX	2000.00	DERC_RET	09/03/2010	01/01/2001	12/31/2001	BRAZORIA	D1023
<a href="#">D2555</a>	NOX	1736.00	DERC_RET	05/17/2011	01/01/2000	12/31/2000	BRAZORIA	D1022
<a href="#">D2734</a>	NOX	433.90	DERC_SELL	08/30/2011	01/01/2000	12/31/2000	BRAZORIA	D2568

## ERC

<b>Certificate Num</b>	<b>Cont Code</b>	<b>Avail Tons</b>	<b>Transaction Type</b>	<b>Active/Inactive</b>	<b>Gen Date</b>	<b>Exp Date</b>	<b>County</b>	<b>Parent Cert Num</b>
<a href="#">3405</a>	NOX	1.90	ERC_INTEN	03/06/2019	04/02/2014	04/02/2019	GALVESTON	2889
<a href="#">3342</a>	NOX	3.80	ERC_BUY	12/11/2018	10/03/2013	10/03/2018	GALVESTON	2874
<a href="#">3405</a>	NOX	1.90	ERC_USE	03/06/2019	04/02/2014	04/02/2019	GALVESTON	2889
<a href="#">3342</a>	NOX	3.80	ERC_INTEN	12/11/2018	10/03/2013	10/03/2018	GALVESTON	2874
<a href="#">3342</a>	NOX	3.80	ERC_USE	12/11/2018	10/03/2013	10/03/2018	GALVESTON	2874
<a href="#">3405</a>	NOX	1.90	ERC_BUY	03/06/2019	04/02/2014	04/02/2019	GALVESTON	2889

## Confirm Records to Send to TCEQ

**Portfolio Number:P0182**  
**Data current as of:04/30/2025**

### Project Information

**Project Number:** 420044, 420045  
**Portfolio Number:** P0182  
**Customer Name:** THE DOW CHEMICAL COMPANY  
**Customer Reference Number:** CN600356976  
**Regulated Entity:** DOW TEXAS OPERATIONS FREEPORT  
**Regulated Entity Reference Number:** RN100225945  
**Account Name:** BL0082R

### 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
D3683	NOX		144.00	62.40	09/15/2025	09/15/2027	NSR OFFSETS	20432/PSDTX994/N274		

### Supporting Documentation

1 file(s) attached.  
2025-2027\_LHC8-Flaring\_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: 9909C869967A424553949CD093E7656C591D890BA23F1B7893A60E36F03DC459

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

Submission IP address: 170.85.100.247

Submission date and time: 04/30/2025

Submission STEERS Version: 6.90

Submission Confirmation Number: 18850

Submission Data Hash Code: 0A027BFEA4E408FBF5553512FFA76EBD0AFCDB76CB9810BAD9798C96CBCDFF8F



January 27, 2025

Texas Commission on Environmental Quality  
Emission Banking and Trading, MC 206  
P.O. Box 13087  
Austin, Texas 78711-3087

DOW TEXAS OPERATIONS FREEPORT RN100225945  
NOTIFICATION OF INTENT TO USE DERCS FOR OFFSETS  
FORM DEC-2

To TCEQ Emission Banking & Trading,

The purpose of this submittal is to notify the TCEQ that Dow Texas Operations Freeport RN100225945 intends to use discrete emission reduction credits to offset the permit requirements for NSR 20432 / PSDTX994M2 / N274 for the 2025 - 2027 control periods.

For future correspondence, please contact:

Prentice C. James (979) 238-1443 or  
FAX (979) 235-8117  
e-mail [pcjames@dow.com](mailto:pcjames@dow.com)

Respectfully,

**Prentice C. James**

Prentice C. James  
Regional Emissions Manager  
The Dow Chemical Company



**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>The Dow Chemical Company</b>			
Mailing Address: <b>2301 N. Brazosport Blvd</b>			
City: <b>Freeport</b>	State: <b>TX</b>	Zip Code: <b>77541</b>	
Telephone: <b>979-238-1443</b>		Fax: <b>979-235-8117</b>	
B. TCEQ Customer Number (CN): <b>CN600356976</b>			
C. Site Name: <b>Texas Operations Freeport Site</b>			
Street Address: <b>2301 N. Brazosport Blvd</b>			
Nearest City: <b>Freeport</b>	Zip Code: <b>77541</b>	County: <b>Brazoria</b>	
D. TCEQ Regulated Entity Number (RN): <b>RN100225945</b>			
E. TCEQ Air Account Number: (if applicable): <b>BL-0082-R</b>			
F. Primary SIC:		Air Permit Number:	
<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>Prentice C. James</b>			
Technical Contact Title: <b>Regional EH&amp;S Manager</b>			
Mailing Address: <b>332 SH 332E, 1B189A</b>			
City: <b>Lake Jackson</b>	State: <b>TX</b>	Zip Code: <b>77566</b>	
Telephone: <b>979-238-1443</b>	Fax: <b>979-235-8117</b>	E-mail: <b>pcjames@dow.com</b>	
<b>III. Company Contact Identifying Information (If different from Technical Contact)</b>			
A. Company Contact Name: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) :			
Company Contact Title:			
Mailing Address:			
City:	State:	Zip Code:	
Telephone:	Fax:	E-mail:	
<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: <u>2001</u> Year of Use: <u>2025-2027</u> Ratio of DERC to Allowance: <u>n/a</u> to <u>n/a</u>			
<i>Note: If DERC use is to comply with MECT then go to Section IX</i>			
<b>V. Intended Use Period</b>			
Intended Use Start Date: <u>09</u> / <u>15</u> / <u>2025</u>		Intended Use End Date: <u>9</u> / <u>14</u> / <u>2027</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

**DERCs used to offset 26 tons-NO<sub>x</sub> increase annually for NSR 20432 / PSDTX994M2 / N274. See special conditions section of applicable permit for more detail.**

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 (mmbtu)	Expected Emission Rate (lb-NOx/mmbtu)	Expected Total Emissions (tons)	Regulated Activity (mmbtu)	Regulated Emission Rate (lb/hr)	Regulated Total Emissions (tons)	DERCs (tons)
								<b>Total:</b>	



**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 <sub>x</sub> : <u>52</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Offset Ratio (if required)	CO: _____	NO <sub>x</sub> : <u>1.2 : 1</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	VOC: _____
Environmental Contribution (+ 10%)	CO: _____	NO <sub>x</sub> : <u>n/a</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>	CO: _____	NO <sub>x</sub> : <u>62.4</u>	PM <sub>10</sub> : _____	SO <sub>2</sub> : _____	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: D3683

Date on which the DERCS were acquired or will be acquired: 2001

*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 January 27, 2025

Title Regional Emissions Manager

## Special Conditions

Permit Numbers 20432, N274, and PSDTX994M2

Page 15

### G. Sulfur in Fuel Gas and Feedstocks:

- (1) Records of the total sulfur concentration in fuels, process streams, and feedstocks as required by Special Condition No. 13.
  - (a) Natural Gas: grains of sulfur per 100 standard cubic feet (scf) measured initially and annually during the first quarter of each year, and
  - (b) Feedstocks/Process Streams: ppm sulfur measured within 90 days of first use and then annually during the first quarter of each year when used, or
- (2) In lieu of the feedstock and natural gas testing specified above, a copy of the natural gas or feedstock purchase contract or purchase specification that indicates the natural gas and feedstock stream sulfur content to be used with flowrate data to demonstrate compliance as required by (1) (a) of this condition.

### H. Documentation sufficient to demonstrate compliance with the emission rates listed on the attached table entitled "Emission Sources – Maximum Allowable Emission Rates."

## Netting and Offsets

34. This Nonattainment New Source Review (NNSR) permit (N264; NSR amendment application, PI-1 dated May 21, 2019 and as updated) is issued/approved based on the requirement that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H. **(08/20)**
35. The permit holder shall use 31.2 tons per year (tpy) of NO<sub>x</sub> credits to offset the 26.00 tpy NO<sub>x</sub> project emission increase for the facilities authorized by this permit at a ratio of 1.20 to 1.0. **(08/20)**
36. Prior to the commencement of operation, the permit holder shall obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number. **(08/20)**

## Flare Coordination

37. NSR Permit 20432 authorizes only the emissions from The Dow Chemical Company's Light Hydrocarbons (LHC)-8 Unit. Braskem America, Inc.'s NSR Permit 37884 utilizes flares contained in NSR 20432 that are owned by The Dow Chemical Company. Texas Emissions Inventory emissions from NSR Permit 20432 are reported only by The Dow Chemical Company and do not include emissions from NSR 37884. Contemporaneous netting analysis as a result of Federal Prevention of Significant Deterioration and Nonattainment applicability for NSR Permit 20432 are completed by The Dow Chemical Company and do not include considerations of Braskem America, Inc. or NSR 37884. **(08/20)**

## Maintenance, Startup, and Shutdown

38. This permit authorizes emissions from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), Attachment A, Attachment B, and Attachment C of the Special Conditions and the facilities covered by this permit are authorized to emit subject to the emission rate limits on the MAERT and other requirements specified in the special conditions. **(07/21)**

**From:** [Natalie Namba](#)  
**To:** [James, Prentice \(PC\)](#)  
**Subject:** RE: Action Required by 6/6/2025: Notice of Deficiency for Dow Texas Operations Freeport's DERC Intent to Use  
**Date:** Tuesday, June 10, 2025 1:22:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Good Afternoon Prentice,

No problem at all, I received your automatic out of office email notification so I was aware that you would not be able to respond until sometime this week.

Thank you for confirming the intended use period. I will update the intended use period in our database to September 15, 2025 - September 14, 2027. There is no additional action is needed from you or the company at this time.

Hope you have a great rest of your week!

Thank you again,



Natalie Namba  
Natural Resource Specialist II  
Air Permits Division, Office of Air, TCEQ  
(512) 239-2583  
[Natalie.Namba@tceq.texas.gov](mailto: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:** James, Prentice (PC) <pcjames@dow.com>  
**Sent:** Tuesday, June 10, 2025 8:33 AM  
**To:** Natalie Namba <Natalie.Namba@tceq.texas.gov>  
**Subject:** RE: Action Required by 6/6/2025: Notice of Deficiency for Dow Texas Operations Freeport's DERC Intent to Use

Good morning Natalie,

Hope all is well. Apologies for the late response as I have been out of the office.

The intended use period is September 15, 2025 to September 14, 2027. I must have made an error within STEERS. Please let me know if I need to formally resubmit the project through STEERS. Apologies for any inconveniences.

Please let me know if you have any questions or concerns. Thanks.

Kind regards,

*Prentice*

---

Prentice C. James  
Texas Regional Emissions Manager

The Dow Chemical Company  
Office# 979.238.1443  
[pcjames@dow.com](mailto:pcjames@dow.com)

General Business

**From:** Natalie Namba <[Natalie.Namba@tceq.texas.gov](mailto:Natalie.Namba@tceq.texas.gov)>  
**Sent:** Tuesday, June 3, 2025 10:58 AM  
**To:** James, Prentice (PC) <[pcjames@dow.com](mailto:pcjames@dow.com)>  
**Subject:** Action Required by 6/6/2025: Notice of Deficiency for Dow Texas Operations 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 Prentice James:

This e-mail is in response to the DERC Intent to Use application submitted to the Texas Commission on Environmental Quality (TCEQ) on April 30, 2025 (EBT Project Number 420044).

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

1. In section V of the DERC Intent to Use application, the intended use period is listed as September 15, 2025 to September 14, 2027. However, in the State of Texas Environmental Electronic Reporting System (STEERS) submission of this project, the use period is September 15, 2025 to September 15, 2027. Please confirm the intended use period.

Please provide this information by **June 6, 2025**. 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](mailto:Natalie.Namba@tceq.texas.gov)

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**From:** [Natalie Namba](#)  
**To:** [James, Prentice \(PC\)](#)  
**Cc:** [jodiey@brazoria-county.com](mailto:jodiey@brazoria-county.com)  
**Subject:** TCEQ EBT Documents - DERC Intent to Use and Use - Dow Texas Operations Freeport  
**Date:** Thursday, June 19, 2025 7:59:00 AM  
**Attachments:** [420044, 420045 DERC Intent, Use Letter.pdf](#)

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Please see the attached EBT document(s) for Project Numbers **420044** and **420045**. 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](mailto: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](#); [Natalie Namba](#)  
**Subject:** RE: For Review and Approval by 6/18/2025: DERC Intent and DERC Use Projects 420044 and 420045  
**Date:** Monday, June 16, 2025 9:22:48 AM

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Approved

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



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**From:** Rebecca Partee <[rebecca.partee@tceq.texas.gov](mailto:rebecca.partee@tceq.texas.gov)>  
**Sent:** Monday, June 16, 2025 7:48 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)>; Natalie Namba <[Natalie.Namba@tceq.texas.gov](mailto:Natalie.Namba@tceq.texas.gov)>  
**Subject:** FW: For Review and Approval by 6/18/2025: DERC Intent and DERC Use Projects 420044 and 420045

Sam,

Please see the attached for your approval.

Thank you,  
Rebecca

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**From:** PSSMGR <[PSSMGR@tceq.texas.gov](mailto:PSSMGR@tceq.texas.gov)>  
**Sent:** Friday, June 13, 2025 1:50 PM  
**To:** Rebecca Partee <[rebecca.partee@tceq.texas.gov](mailto:rebecca.partee@tceq.texas.gov)>  
**Cc:** EBTTL <[EBTTL@tceq.texas.gov](mailto:EBTTL@tceq.texas.gov)>; Natalie Namba <[Natalie.Namba@tceq.texas.gov](mailto:Natalie.Namba@tceq.texas.gov)>  
**Subject:** FW: For Review and Approval by 6/18/2025: DERC Intent and DERC Use Projects 420044 and 420045

Please see the attached documents for DERC Intent to Use and DERC Use Projects 420044 and 420045.