



March 29, 2006

The Dow Chemical Company  
P.O. Box 150  
Plaquemine, Louisiana 70765-0150

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Dr. Chuck Brown  
Department of Environmental Quality  
Office of Environmental Services  
P.O. Box 4313  
Baton Rouge, LA 70821-4313

Attention: Mr. Bryan Johnston

**VOC AND NOX EMISSION REDUCTION CREDITS BANKING 2005 ANNUAL REPORT  
LAC 33:III.613.B  
JANUARY 1, 2005 THROUGH DECEMBER 31, 2005  
THE DOW CHEMICAL COMPANY, LOUISIANA OPERATIONS**

Dear Dr. Brown:

Attached are the Annual Reports as required by LAC 33:III.613.B.2 for the reporting year January 1, 2005 through December 31, 2005. This report represents the Volatile Organic Compound (VOC) and Oxides of Nitrogen (NOx) emission reduction credits generated and consumed during the 2005 calendar year. This report also includes emission reduction credits that have expired as of 12/31/2005.

VOC ERC Annual Report (Section 1)

As shown in the report, VOC-15 and VOC-16 have expired. VOC-15 was the reduction associated with a project at the Glycol I plant. VOC-16 was a reduction associated with a project at the Polyethylene B HDPE & EPDM Plant.

NOx Annual Report (Section 2)

In this report, NOx-10 is being adjusted due to the quantity of these reductions that were used as part of the NOx RACT Compliance Plan submitted to LDEQ on November 1, 2004. The plan was approved by LDEQ on April 28, 2005.

Included in this submittal is the certification statement by the Responsible Official as required by LAC 33:III.613.C.

If you have any questions or would like to discuss these items further, please contact me at (225) 353-8270.

Respectfully,

  
Bob Brady  
Environmental, Health, and Safety Services

Attachments

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LDEQ/OEA/AQAD  
Engineering Support

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Office of  
Environmental Compliance

**EMISSION REDUCTION CREDITS ANNUAL REPORT  
CERTIFICATION  
LAC 33:III.613.B.2**

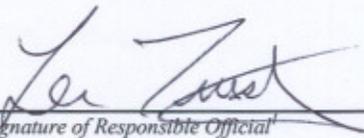
As required by LAC 33:III.613.B.2 an annual report summarizing all records required by LAC 33:III.613.A shall be submitted to the department by March 31 of each year. This submittal shall be certified as specified in LAC 33:613.C.

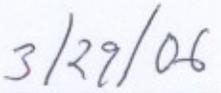
Below is the certifying statement described in Section C of this Subsection and signed by the Responsible Official as defined in LAC 33:III.502.

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"I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that base on information and belief formed after reasonable inquiry, the statements and information contained in the ERC Annual Report are true, accurate, and complete."

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\_\_\_\_\_  
*Signature of Responsible Official*

  
\_\_\_\_\_  
*Date*

Lee Trusty  
Site Director, Louisiana Operations  
The Dow Chemical Company

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<sup>1</sup> LAC 33:III.502 - *Responsible Official* - one of the following:

a: for a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative of such person is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

i. the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars);or

ii. the delegation of authority to such representatives is approved by the permitting authority prior to submittal of any certification by such person.

**Section 1    ERC 2004 Annual VOC Report**

ERC Annual Report  
 January 1, 2005 - December 31, 2005  
 LAC 33:III.613.B  
 VOC  
 The Dow Chemical Company, Louisiana Operations

The Dow Chemical Company  
 21255 Louisiana Highway 1, Plaquemine, LA 70765  
 Iberville and West Baton Rouge

Considering First In - First out Offsets and other reductions consumed in netting.

Previous 2004 Year-End "Pending" Balance: 156.97

Previous 2004 Year-End "Approved" Balance: 0.00

ERC Item Number	Brief Description of Project Which Generated or Required Use of ERC, or Transfer Information, etc. §613.A.1.a	Affected Permit Number(s)	Transaction Date §613.A.1.h	ERC Applied For But Not Yet Approved <sup>1</sup> §613.A.1.b	Approved ERC Deposits <sup>1</sup> §613.A.1.c	ERC Used as Offsets §613.A.1.d	ERC Which Expired §613.A.1.e	ERC Transferred to Another Party §613.A.1.f	Adjustments for New Emission Reduction Requirements <sup>2</sup> §613.A.1.g	Adjustments for Netting <sup>3</sup> §613.A.1.g	Adjustments after Netting	ERC Balance §613.A.1.i
VOC-15	Glycol I Project	2188	June 1, 1995	4.77			4.77					
VOC-16	Polyethylene B HDPE & EPDM Plant	2203	October 15, 1995	58.56			58.56					
2005 Year-End "Pending" Balance:				93.64								0.00
								2005 Year-End "Approved" Balance:				0.00

**Section 2    ERC 2004 Annual NO<sub>x</sub> Report**

